THE 8100 VALENTINE PROJECT

CEQA Section 15183 Environmental Review Consistency Checklist

CONTENTS

CEQA Section 15183 Environmental Review Consistency Checklist

Page

Introduction **1**

Project Description **2**
- Introduction 2
- Project Location 2
- Land Use Designation and Zoning 3
- Project Description ..... **Error! Bookmark not defined.**

City of Sebastopol General Plan Update and Final EIR **8**

Terminology Used in This Document **8**
- GPU FEIR and GPU DEIR 8
- Planning Area 8

Summary of Findings **8**

CEQA Section 15183 Environmental Review Consistency Checklist **10**
1. Aesthetics 11
2. Agriculture and Forestry Resources 13
3. Air Quality 15
4. Biological Resources 18
5. Cultural Resources 21
6. Energy 24
7. Geology and Soils 25
8. Greenhouse Gas Emissions 28
9. Hazards and Hazardous Materials 30
10. Hydrology and Water Quality 33
11. Land Use and Planning 36
12. Mineral Resources 38
13. Noise and Vibration 39
14. Population and Housing 42
15. Public Services 43
16. Recreation 45
17. Transportation 46
18. Tribal Cultural Resources 50
19. Utilities and Service Systems 52
20. Wildfire 54

Appendices

A. Project Plans
B. 8100 VALENTINE Project CEQA Transportation Assessment

Figures

Figure 1 Regional Location 3
Figure 2 Project Site 4

Tables

Table 1 Project Parcel Information 2

THE 8100 VALENTINE PROJECT

CEQA Section 15183 Environmental Review Consistency Checklist

Date:	September 22, 2026
Project Title:	8100 Valentine Avenue Residential Project
GP Designation:	Medium Density Residential (MDR)
Density:	2.69 upa (max 8.7 upa)
Zoning:	R-4 (Medium-Density Residential)
Applicant:	Grupe Investment Company, Inc.
Staff Contact:	John Jay, Contract Associate Planner City of Sebastopol Planning Department (707) 823-6167 jjay@cityofsebastopol.org

Introduction

California Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that (1) are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent; (2) are potentially significant off-site impacts and cumulative impacts that were not discussed in the prior EIR prepared for the general plan, community plan, or zoning action; or (3) are previously identified significant effects which, as a result of substantial new information that was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact. Accordingly, this document comprises a statement of reasons for exemption from additional environmental review under CEQA for the proposed 8100 Valentine Avenue Residential Project in the City of Sebastopol.

Project Description

Introduction

The 8100 Valentine Avenue Residential Project ("proposed project" or "project") is a proposed 20-lot, 39-home for-sale single-family residential subdivision located at 8100 Valentine Avenue in Sebastopol, California (APN 008-510-054). The project is proposed by Grupe Investment Company, Inc. (Grupe) on a 2.69-acre site currently owned by The Church of Jesus Christ of Latter-day Saints. The site is zoned R-4 (Medium-Density Residential), which permits a maximum density of 8.7 dwelling units per acre. In alignment with AB 1033 and recently adopted local enabling legislation, 19 of the 20 lots will include a detached accessory dwelling unit (ADU) intended for separate sale, resulting in a total of 39 homes. The project targets the "missing middle" housing market segment, providing attainable for-sale homeownership opportunities without reliance on public subsidies.

Project Location

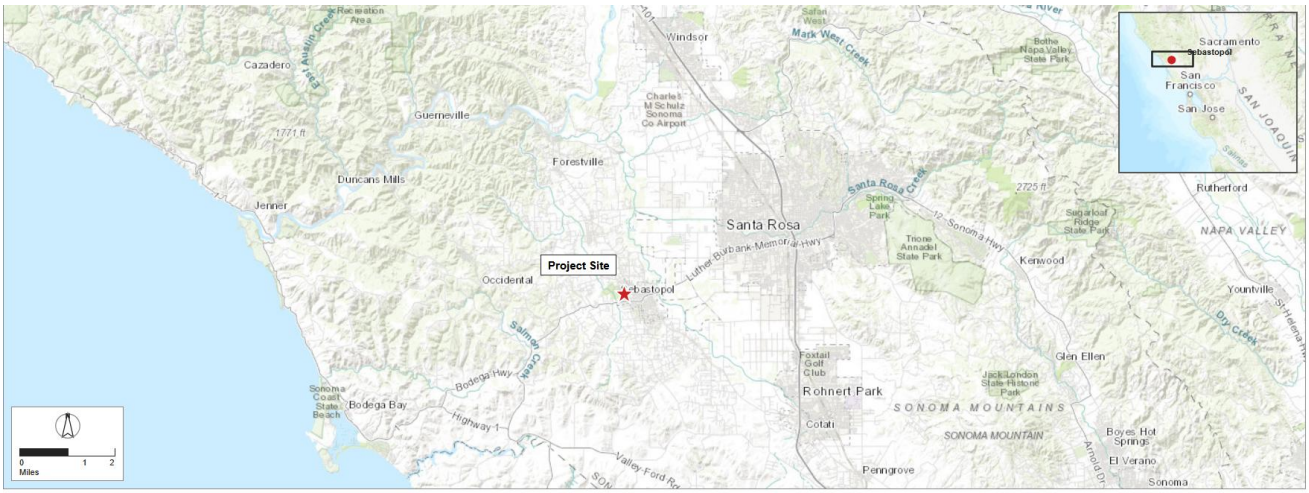
The project site is located at 8100 Valentine Avenue in Sebastopol, California (APN 008-510-054). The site consists of a 2.69-acre parcel currently developed with an existing religious facility formerly operated by The Church of Jesus Christ of Latter-day Saints, which ceased operations approximately 18 months prior to the project application in preparation for sale of the property. The site is zoned R-4 (Medium-Density Residential) and is substantially surrounded by established medium-density residential uses. All major utility infrastructure is available on or adjacent to the site, including an existing 12-inch municipal storm drain and 6-inch sanitary sewer line in an easement along the eastern property line, and a 6-inch municipal water main along the Valentine Avenue frontage. Table 1 identifies the parcel information for the project.

Table 1
Project Parcel Information

Name/Description	Project Component	APN	Dev. Acreage	Owner	GP Land Use	Zoning
8100 Valentine Avenue Project Site	20-lot residential subdivision with primary dwellings and detached ADUs	008-510-054	2.69 acres	The Church of Jesus Christ of Latter-day Saints	Medium Density Residential (MDR)	R-4 (Medium-Density Residential)

Figure 1 shows the regional location for the project. Figure 2 shows the project site.

Figure 1 Regional Location



SOURCE: ESRI, OpenStreetMap

8100 Valentine Avenue Residential Project
Figure 1
Regional Location

Figure 2 Project site



Land Use Designation and Zoning

The proposed project is consistent with the land use designation in City of Sebastopol General Plan and would be approved through the City's standard discretionary entitlement process, including Vesting Tentative Map, Design Review, State Density Bonus, and CEQA review.

The project site is designated Medium Density Residential (MDR) on the City of Sebastopol General Plan Land Use Map. The MDR designation is applicable to single-family residential areas with densities up to approximately 8.7 units per acre. The designation provides for a range of housing types consistent with the established residential character of surrounding neighborhoods.

The site is zoned R-4 (Medium-Density Residential) under the City of Sebastopol Zoning Map and Code (Title 17 of the Sebastopol Municipal Code, Chapter 17.20). The purpose of the R-4 District is to implement the Medium Density Residential land use category of the General Plan. This district is

applicable to single-family residential areas with densities up to approximately 8.7 units per acre. Single-family dwellings are permitted by right in the R-4 district. Accessory dwelling units (ADUs) are permitted ministerially subject to the standards of Section 17.220 SMC.

The development standards applicable to the R-4 zone under Table 17.20-2 of the Sebastopol Zoning Code are summarized below. Note that the project has applied for waivers of multiple development standards pursuant to State Density Bonus Law (Government Code Section 65915), as described in the project's State Density Bonus application, for the development standards marked with an asterisk (*):

Development Standard (R-4 Zone, SMC Table 17.20-2)	Requirement	Proposed
Minimum Lot Area (interior, single-family)*	5,000 sf	Smallest proposed lot: 2,501 sf; largest: 5,902 sf
Minimum Lot Width (interior)*	50 ft.	50 ft.
Minimum Lot Width (corner)*	60 ft.	Not applicable
Maximum Height (main buildings)	30 ft., 2 stories	Single-story plans (Plan 1, Plan 2): 15'-7" to 18'-2"; two-story plans (Plan 3, Plan 4): 26'-9" to 29'-0"
Maximum Height (accessory dwelling units)*	17 ft.	Plan 1 748 sf, single-story, 16'-2" to 18'-2"
Front Yard Setback*	20 ft.	15 ft.
Interior Side Yard (main building)*	10% of lot width, or 5 ft., whichever is greater, not to exceed 9 ft.	4 ft.
Interior Side Yard (accessory dwelling unit)	4 ft.	4 ft
Rear Yard (main building)*	20% of lot depth, no less than 20 ft. nor greater than 30 ft.	10 ft.
Rear Yard (accessory dwelling unit)	4 ft.	5 ft or more
Special Setback – Mechanical Equipment*	50% of applicable setback, not less than 5 ft. from rear/side lines	Project conditioned to meet the requirements of Chapter 20 of the Building Code and will be conditioned to attenuate noise at the property line.
Maximum Lot Coverage (parcels ≤ 5,000 sf)*	50%	Not shown
Maximum Residential Density	1 DU/3,630 sf lot area (~8.7 du/ac)	20 Units or 7.43 du/ac which is within the range of 5.4 to 8.7.
Minimum Usable Open Space	50 sf/DU	Will be conditioned to meet this requirement
Minimum Dimensions for Parking (Covered)	10'x20'**	Carport spaces: 54 (39 w/ EV)
Minimum Dimensions for Parking (Uncovered)	9'x19'**	Regular stalls: 9' x 18' (80 stalls)
** As required by SMC 17.110		

* Denotes standards for which project is seeking State Density Bonus Law waivers.

The proposed project's base density of 7.43 lots per acre (20 lots on 2.69 acres) is consistent with the maximum density (8.7 units per acre) allowed in the R-4 zone. Pursuant to Government Code Sections

66314(c) and 66319, ADUs do not count toward density for purposes of zoning compliance or General Plan density calculations.

The applicant seeks waivers from the development standards identified above pursuant to Government Code Section 65915(e), on the basis that such standards would otherwise physically preclude construction of the proposed residential community, including the inclusionary affordable units. Deviations from development standards achieved through waivers and concessions under State Density Bonus Law do not, in themselves, disqualify a project from consistency with the General Plan or zoning designation.

Project Objectives

- Provide attainable "missing middle" for-sale homeownership opportunities in Sebastopol without reliance on public subsidies.
- Leverage AB 1033 and City of Sebastopol enabling ordinance (adopted February 19, 2026) to allow separate sale of ADUs as condominiums, creating a new lower-priced homeownership product type.
- Deliver 39 homes across 20 lots on an infill site, with 3 units (15% of primary dwellings) restricted through long-term agreements to be sold as affordable to households earning 120% or less of AMI.

Project Components

The project proposes 20 lots with 39 total for-sale homes. Primary residences are offered in two floor plans: twelve 4 bedroom, 3bath homes at approximately 1,640 square feet (two-story) and eight 3-bedroom, 2.5-bath homes at approximately 1,422 square feet (two-story). Of the 20 lots, 19 will include a fully detached ADU: eight 2-bedroom, 2 bath ADUs of approximately 1,000 square feet (single-story) and eleven 2-bedroom, 1-bath ADUs at approximately 748 square feet (single-story). Two architectural styles are offered. As the project includes the separate sale of ADU's as condominiums the range of condo parcels after recordation of the condo maps, each parcel will average roughly 1616 square feet in size ranging from 1203 and 2535 square feet. The project also includes open space (3,734 square feet) and dog park (1745 square feet) of which are all under the control of the HOA.

Three of the 20 primary dwelling units will be designated as inclusionary affordable units for households earning 120% or less of Area Median Income (AMI), satisfying the requirements of Sebastopol Municipal Code Section 17.250.050.A.1. The deed restrictions will run in perpetuity.

Parking and Vehicle Access

Vehicular access is provided through a single 26' wide private entrance from Valentine Avenue accommodating full-access movements (left-in/left-out/right-in/right-out). As proposed, the project would provide 83 total on-site parking spaces, including 55 covered carport stalls and 28 open surface stalls, for an overall ratio of approximately 2.13 spaces per home (including ADUs) or 4.15 spaces per primary home. Each homeowner is assigned at least one covered carport space, each equipped with an individual EV-capable charging outlet.

Additionally, the project includes a 12-foot-wide unobstructed secondary emergency egress for the use of residents along the western corridor connecting the end of the private street to Valentine Avenue. This secondary route will ensure that emergency services have proper ingress and egress to the site as the project was not able to incorporate a looped road system. The HOA will be responsible for maintaining this route as clear and unobstructed.

Utilities

Storm Drainage: An existing 12-inch municipal storm drain pipeline runs north–south within an existing 20’ public utilities easement along the eastern property line. The project, as conditioned, will utilize this existing infrastructure. As part of the review process for City staff the applicant provided water and sewer studies for the 39 units to determine if there was enough water and sewer capacity on site which the reports indicated there was. However, City staff took these studies and ran them into their cumulative modeling to ensure that the effect of 39 new residential units would not over burden the City’s system. The project, as conditioned, would connect to the City's existing sewer main on Valentine Avenue. This section of pipe has had ongoing maintenance issues, including root intrusion and debris buildup, which have caused high water levels and made it difficult for the City to fully inspect the pipe with camera equipment.

The City's engineering consultant (GHD) studied this pipe segment to determine whether the high water levels were caused by a lack of pipe capacity or simply by the buildup that needs to be cleaned out. The study found that once the pipe is cleaned and the blockages are removed, it has enough capacity to handle both the current flow and the additional flow from the proposed project, with room to spare. The modeling concluded that the pipe does not need to be enlarged or replaced to serve the project.
This conclusion depends on the City completing routine cleaning and maintenance of the affected pipe segments before the project connects to the system. The study looked only at typical dry-weather flow and did not evaluate how the pipe performs during heavy rain.

Because the project, as conditioned, would use the City's existing sewer system, and because that system has been confirmed to have adequate capacity once routine maintenance is completed, the project, as conditioned, would not require any new or expanded wastewater treatment facilities. No project-specific significant impact peculiar to this parcel has been identified.

Stormwater:

The eastern 25 feet of the site is encumbered by a utility easement for the existing storm drain and sanitary sewer. The project integrates this easement area into the site plan as the primary entry roadway, parking areas, and expanded private backyards. This would include the location of this easement within the rear yards of Lots 12 and 13. Additionally, there is a 5’ private Storm Drain easement that runs east and west and would affect Lots 13-20.

Notably, the proposed development will reduce total impervious surface from approximately 85,000 sf under existing conditions to approximately 66,000 sf, increasing available system capacity. Two on-site water-quality basins will collect and treat site runoff prior to discharge.

Water: The project, as conditioned, will connect to an existing 6-inch municipal water main in Valentine Avenue. A new 6-inch looped water main will serve the community with 20 individual metered services (one per lot). Usage between the primary home and ADU on each lot will be measured by private submeters.

Sewer: An existing 6-inch municipal sanitary sewer line runs north–south along the eastern property line. A new on-site 6-inch sewer main within the private street, with 4-inch individual laterals to each lot, will serve all residential units.

Dry Utilities: Electrical, telecommunications, and related services will utilize existing infrastructure along the Valentine Avenue frontage.

Solid Waste: A centralized trash enclosure will serve all residents under a single HOA-managed service contract. The trash enclosure design and truck turnaround location have been reviewed and conceptually approved by the local trash service provider from a letter provided by the applicant. However, this letter doesn’t include any final design features or specifications and additionally does not include service times

or frequency. Project has been conditioned to provide a waste management plan for the approval by Planning Director and Sonoma County Resource Recovery prior to recordation of the Final Map.

Landscaping and Open Space

The project, as conditioned, provides approximately 6,500 square feet of shared open space in four areas, owned and maintained by the HOA. Of those areas, the first is a central area near the middle of the site, an area within the redwood tree grove in the northeast corner, an area near the bioretention facility, and an area adjacent to the central open space. These areas are envisioned by the applicant for future uses such as gathering and recreation, a dog park, and picnicking among the redwoods, though the applicant is not proposing physical installation of amenities within them at this time. Each primary home also includes a small private backyard maintained by the individual homeowner, while front yards and paseos are maintained by the HOA.

The landscape concept draws on the California Mediterranean aesthetic of the surrounding neighborhood, incorporating low-maintenance, water-conserving plantings. This option will provide the homeowners with a low cost, low maintenance option for landscaping. However, within the backyard areas of each unit the individual property owners would have the ability to plant any variety of materials. The project, as conditioned will preserve 11 of the 18 heritage trees qualifying for a tree removal permit under City of Sebastopol Municipal Code Chapter 8.12.

Project Construction and timing

Project construction is anticipated to commence in 2027, following discretionary approvals and building permit issuance. Construction is expected to last approximately 18 months for horizontal site improvements and vertical construction of all residential units. Construction activities will occur during the City's permitted hours as specified in Sebastopol Municipal Code Section 8.25.060.B.6. All construction equipment will comply with applicable emission standards. Additionally, as part of the construction process the project will include the demolition of the existing church on site along with the removal of landscaped areas and roadways. The applicant will also be required to ensure that on site debris are not transferred to the public right of way through proper Best Management Practices (BMPs). Finally, the project, as conditioned, includes the utilization of AB 1033 which allows for the separate sale of ADU's as condominiums and with that the construction of the Single-family residences and ADU's will happen first, a Final map with those parcels laid out will then be submitted to the City Engineer for review and approval by the City Council. Once that process is complete the applicant can then process the condominium map which separates the ADU's from the Single-family residences as their own legal parcel. This process would also require City Engineer review and City Council approval.

Required Project Approvals

Required discretionary project approvals include:

- CEQA Compliance (includes Section 15183 Consistency Review)
- Vesting Major Subdivision Tentative Map (VTM) to create the initial 20 lots and formation of an HOA with CC&Rs to own and maintain the common spaces.
- Major Design Review of the Major Subdivision (note, ADUs are not subject to Design Review)
- State Density Bonus Application (includes the provision of restricted affordable units and the request for concession and development standard waivers under GC 65915)

- Tree Removal Permits (Chapter 8.12 SMC)
- Once the development is approved and each of the 20 lots are built out with both primary units and ADUs, each lot would be permitted to request a parcel map under the AB 1033 and SMC 17.220.030 provisions to place the ADU on a separate legal lot.
- The applicant has requested to participate in the BOLD Program Approval (optional financing mechanism for development impact fees). This program's participation will require future City Council approval.

City of Sebastopol General Plan and Final EIR

The City of Sebastopol General Plan (GP) is a comprehensive, long-term general plan for the physical development of the City's Planning Area. The GP Final EIR (GP FEIR) was certified in conjunction with adoption of the GP on November 15, 2016. The GP FEIR comprehensively evaluated environmental impacts that would result from implementation of the GP, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts.

Terminology Used in This Document

GP FEIR and GP DEIR

For the reasons explained in this subsection, this document references both the GP FEIR and the GP Draft EIR (GP DEIR).

In accordance with CEQA, the GP DEIR described and analyzed the environmental effects of implementing the GP and discussed ways of mitigating or avoiding potentially significant effects, where feasible. The Draft GP and the GP DEIR were made available for public review from May 23, 2016, through July 8, 2016. In accordance with CEQA, the GP FEIR was prepared to address comments received in response to the GP DEIR and included textual changes to the GP DEIR, where warranted. Responses to comments received during the comment period did not involve any new significant impacts or significant new information that required recirculation of the GP DEIR pursuant to CEQA. The GP FEIR was certified in conjunction with adoption of the GP on November 15, 2016 (State Clearinghouse [SCH] Number 2016032001). Because the GP DEIR contains the primary environmental analysis that supports the GP FEIR, this document makes frequent reference (by impact number and page numbers) to the GP DEIR. These references to the GP DEIR incorporate any and all revisions to the GP DEIR contained in the certified GP FEIR. References in this document to the GP FEIR refer to the certified EIR for the adopted GP, including all textual changes to the GP DEIR.

Planning Area

As described on pages 2-1 to 2-2 of the GP Land Use Element and shown on GP Figure 2.1, *General Plan Land Use Map*, the Sebastopol Planning Area consists of the incorporated City limits, the City's Sphere of Influence (SOI), and the City's Urban Growth Boundary (UGB).

Summary of Findings

A comprehensive environmental evaluation has been completed for the proposed project as allowed by Public Resources Code (PRC) Section 21083.3 and CEQA Guidelines Section 15183. As described below, the proposed project is consistent with the development density and use characteristics established by the City of Sebastopol GP and analyzed in the GP FEIR. No additional environmental review is required.

In accordance with CEQA Guidelines Section 15183, the following findings can be made for the proposed project:

1. **The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**

   The project consists of a proposed residential housing development project with up to 20 single family units and 19 Accessory Dwelling Units (ADUs)s. The project site (inclusive of the residential lots, private streets, common open space, and utility infrastructure) is designated as Medium Density Residential (MDR) on the City of Sebastopol General Plan Land Use Map. The site is zoned R-4, which permits residential development at a maximum density of 8.7 dwelling units per acre. Development standard deviations achieved through waivers and concessions granted under State Density Bonus Law do not disqualify the project from consistency with the General Plan or zoning designation. ADUs do not count toward density under Government Code Sections 66314(c) and 66319. As conditioned, the proposed project is consistent with the General Plan and applicable zoning regulations.

2. **There are no project specific effects which are peculiar to the project or its site.**

   As detailed in the CEQA Section 15183 Environmental Review Consistency Checklist included in this document, there are project specific effects which are peculiar to the project or its site.

3. **There are no project specific impacts which the GP FEIR failed to analyze as significant effects.**

   As detailed in the CEQA Section 15183 Environmental Review Consistency Checklist included in this document, there are no project specific impacts which the GP FEIR failed to analyze as significant effects.

4. **There are no potentially significant off-site and/or cumulative impacts which the GP FEIR failed to evaluate.**

   As detailed in the CEQA Section 15183 Environmental Review Consistency Checklist included in this document, there are no potentially significant off-site and/or cumulative impacts which the GP FEIR failed to evaluate.

5. **There is no substantial new information which results in more severe impacts than anticipated by the GP FEIR.**

   As detailed in the CEQA Section 15183 Environmental Review Consistency Checklist included in this document, there is no substantial new information which results in more severe impacts than anticipated by the GP FEIR.

6. **The project will undertake any applicable mitigation measures specified in the GP FEIR.**

   As detailed in the CEQA Section 15183 Environmental Review Consistency Checklist included in this document, there are mitigation measures specified in the GP EIR that are applicable to the proposed project. The GP EIR relies on the Sebastopol Municipal Code's tree protection ordinance to mitigate the environmental impacts of tree removals. As this project intends to remove trees on site, they would be subject to compliance with the tree protection ordinance to mitigate the impacts of tree removal

Signature	Date
Printed Name	Title

CEQA Section 15183 Environmental Review Consistency Checklist

The checklist below provides an analysis of potential environmental impacts resulting from implementation of the proposed project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the proposed project would result in a potentially significant impact triggering additional review under CEQA Guidelines Section 15183.

- Items checked "Significant Project Impact" indicate that the proposed project could result in a significant effect that is peculiar to the proposed project or the parcels on which the project would be located and were not analyzed as significant effects in the GP FEIR.
- Items checked "Project Impact not Identified by GP FEIR" indicate that the proposed project would result in a significant project-specific impact that was not identified in the GP FEIR.
- Items checked "Off-Site or Cumulative Impact not Identified by GP FEIR" indicate that the proposed project would result in a significant off-site or cumulative impact that was not identified in the GP FEIR.
- Items checked "Substantial New Information" indicate that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the GP FEIR.

As shown in the following checklist, none of the above items are checked. An analysis of potential environmental impacts resulting from the proposed project is provided in the checklist below for each environmental resource topic included in CEQA Guidelines Appendix G.

1. Aesthetics

AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GP FEIR*	*Off-Site or Cumulative Impact not Identified by GP FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR*
a) Have a substantial adverse effect on a scenic vista?	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No	No	No	No
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	No	No	No	No
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	No	No	No	No

Discussion

a) GP DEIR Impact 3.1-1 evaluated scenic vista impacts associated with General Plan buildout. The analysis determined that, while the Planning Area contains numerous areas and viewsheds with relatively high scenic value, there are no officially designated scenic vista points or scenic highways within the City. Significant visual resources in the Planning Area include agricultural land, grassland, woodlands, riverine areas, wetlands, and public art, all visible from public vantage points including highways, roads, and open space areas throughout the Planning Area. The analysis found that GP buildout would allow new development in historically agricultural or previously undeveloped areas, which could degrade the Planning Area's visual character. GP Land Use, Community Design, and Conservation and Open Space Element policies would direct new development to and around existing urbanized areas and require visual compatibility with nearby open space resources, but the GP FEIR concluded that impacts to scenic resources particularly from new industrial and commercial development on agricultural or undeveloped lands would remain significant and unavoidable.

   The 8100 Valentine Avenue project site is a 2.69-acre, previously developed urban parcel zoned R-4 and surrounded by established medium-density residential uses. It does not abut agricultural land, grasslands, or previously undeveloped open space. The project, as conditioned, is the type of development that GP land use and community design policies were intended to encourage as an alternative to greenfield expansion. The project, as conditioned, would not interrupt views of agricultural land, woodlands, riverine areas, or other visual resources identified in the GP DEIR. No project-specific significant impact peculiar to this parcel has been identified.

b) GP DEIR Impact 3.1-1 also evaluated impacts to scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. The analysis found that no officially designated scenic highways are located in the City, and that SR-12 and SR-116 are the principal highway corridors through the Planning Area. GP buildout would allow primarily infill commercial and industrial development along these corridors, but the analysis found that new and expanded development along corridors with high scenic values could result in significant impacts, and that the only way to fully avoid such impacts would be to severely restrict development potential on undeveloped lands an approach inconsistent with

the GP's economic development objectives. The GP FEIR therefore concluded that scenic resource impacts along highway corridors would be significant and unavoidable.

The project site is not located on or adjacent to SR-12, SR-116, or any other designated or undesignated scenic highway corridor. The site fronts Valentine Avenue, a local residential street, and is fully within an established residential neighborhood. The highway-adjacent commercial and industrial expansion that drove the GP FEIR's finding is not applicable to the proposed project. As discussed in Section 11 (Land Use and Planning), the project, as conditioned, is consistent with the GP and conforms with Zoning Code requirements for use. No project-specific significant impact peculiar to this parcel has been identified.

c) GP DEIR Impact 3.1-1 evaluated visual character and scenic quality impacts associated with GP buildout. The analysis found that GP Land Use, Community Design, and Conservation and Open Space Element policies would direct new development to and around existing urbanized areas and require that new development be designed to be visually compatible with its surroundings. Community Design Element policies requiring architectural and site design compatibility, landscaping, and screening were identified as key mechanisms for reducing visual character impacts. The GP FEIR concluded that, with implementation of these policies, impacts to visual character in urbanized areas would be less than significant.

   The project site is located within the City's urbanized area on an MDR-designated parcel zoned R-4. The project will be subject to Design Review, which evaluates architectural design, massing, materials, landscaping, and neighborhood compatibility consistent with GP Community Design Element policies. Additionally, the project requires Planning Commission recommendation to City Council for the approval of a Tentative Map for the subdivision. The project replaces an existing church building with residential structures appropriate to the R-4 zone. Because the site is within an urbanized area, in the lens of CEQA it does not conflict with zoning or regulations governing scenic quality. As conditioned, the project is consistent with R-4 development standards and the GP land use designation. No project-specific significant impact peculiar to this parcel has been identified.

d) GP DEIR Impact 3.1-2 evaluated light and glare impacts associated with GP buildout. The analysis found that nighttime lighting impacts would be most severe in areas not currently experiencing high levels of artificial lighting, and that new development could reduce night sky visibility and detract from the rural quality of life in Sebastopol. The analysis also found that GP buildout would introduce new sources of daytime glare from reflective surfaces and windows, including in previously undeveloped areas. The GP FEIR concluded that, through implementation of GP policies and Municipal Code lighting standards during development review, adverse impacts associated with light and glare could be reduced to a less-than-significant level.

   The project site is located within an established residential neighborhood where ambient lighting already exists. The proposed project would introduce standard residential exterior lighting consistent with the surrounding neighborhood and designed to comply with applicable Municipal Code standards, including requirements to minimize light spillover onto adjacent properties. New lighting would not be introduced to an otherwise unlit area and would not result in a new or substantially increased impact relative to existing conditions. No project-specific significant impact peculiar to this parcel has been identified.

Conclusion

As discussed above, no aesthetics impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

2. Agriculture and Forestry Resources

AGRICULTURE AND FORESTRY RESOURCES — Would the project Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GP FEIR***	***Off-Site or Cumulative Impact not Identified by GP FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR***
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No	No	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No	No	No	No
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	No	No	No	No
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No	No	No	No
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No	No	No	No

Discussion

a) Impacts related to conversion of farmland that would result from implementation of the GP were evaluated under Impact 3.2-1 on pages 3.2-6 to 3.2-8 of the GP DEIR. The analysis determined that Sebastopol does not have any prime farmlands, unique farmlands, or farmlands of statewide importance within the City's Planning Area, as designated by the California Department of Conservation Farmland Mapping and Monitoring Program. The analysis determined that portions of locally important farmlands may be converted to accommodate additional residential and industrial opportunities, the implementation of GP policies and actions that provide protection and preservation of agricultural lands would reduce any potential impacts to less than significant.

The project site is designated as Urban and Built-Up Land by the California Department of Conservation Farmland Mapping and Monitoring Program (California Department of Conservation, 2024a).

b) Impacts related to conflicts with existing zoning for agricultural use or a Williamson Act contract that would result from implementation of the GP were evaluated under Impact 3.2-2 on pages 3.2-8 to 3.2-9 of the GP DEIR. The analysis determined that no parcels within the City's

Planning Area are under a Williamson Act Contract. Several parcels within the city are zoned Residential Agricultural (RA) under Title 17 of the Sebastopol Municipal Code, and the majority of those parcels are designated Low Density Residential (LDR) on the General Plan Land Use Map. The GP includes a comprehensive set of policies aimed at protecting, enhancing, and preserving agricultural lands and agricultural resources throughout the Planning Area and lands in the vicinity of Sebastopol. The analysis determined that implementation of the GP would have a less than significant impact relative to this topic and no mitigation is required.

The project site is designated as Medium Density Residential (MDR) on the City of Sebastopol General Plan Land Use Map. The site is zoned Single Family Residential (R4). The project site is not on or adjacent to land under a Williamson Act Contract or zoned for agricultural use, and there would be no impact under this significance criterion.

c,d) As discussed on pages 3.2-2 to 3.2-3 of the GP DEIR, there are no forest lands or timber lands located within the City's Planning Area. There would be no impacts related to forest lands or timber lands.

e) As previously discussed, the proposed project would construct residential housing development on development sites that are urbanized, have been previously developed, and do not include agricultural or forest uses. There would be no impacts related to forest lands or timber lands.

Conclusion

As discussed above, no agriculture or forestry resource impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

References

California Department of Conservation, 2024a. California Important Farmland Finder. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed May 18, 2026.

3. Air Quality

AIR QUALITY — Would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GP FEIR*	*Off-Site or Cumulative Impact not Identified by GP FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR*
a. Conflict with or obstruct implementation of the applicable air quality plan?	No	No	No	No
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	No	No	No	No
c. Expose sensitive receptors to substantial pollutant concentrations?	No	No	No	No
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No	No	No	No

Discussion

a) Impacts related to conflicting or obstructing implementation of the applicable air quality plan resulting from implementation of the GP were evaluated under Impact 3.3-1 on pages 3.3-25 to 3.3-31 of the GP DEIR. The analysis determined that implementation of the GP would not conflict with or obstruct implementation of the Bay Area Air Quality Management District (BAAQMD) 2010 Clean Air Plan (CAP), which was the applicable plan at the time of GP adoption. The CAP's primary goal is to protect air quality through 55 control measures aimed at reducing air pollution in the Bay Area. The GP Conservation and Open Space Element includes an extensive list of policies and action measures specifically aimed at improving air quality, including Action COS-7g requiring the application of dust control measures during grading and construction. These GP policies and actions are consistent with the intent of the CAP's control measures. The GP Circulation Element further includes a wide range of policies and actions that would effectively reduce vehicle miles traveled throughout the City's Planning Area, thereby reducing mobile-source emissions. The GP FEIR concluded that implementation of the GP would not disrupt, delay, or otherwise hinder the implementation of the CAP, and the impact was found to be less than significant. The proposed project is consistent with the GP's land use designation of Medium Density Residential (MDR) and R-4 zoning. The project would demolish the existing religious facility at 8100 Valentine Avenue and construct a 20-lot, 39-home for-sale residential community on a 2.69-acre urbanized infill site surrounded by established medium-density residential uses. As an infill residential project of the type and density contemplated by the GP, the proposed project would not introduce land uses, traffic volumes, or emission-generating activities beyond those already evaluated in the GP FEIR. The project does not include any industrial, manufacturing, or other high-emission land uses. Accordingly, the proposed project would not conflict with or obstruct implementation of the CAP or any subsequently adopted clean air plan, and no project-specific significant impact peculiar to this parcel has been identified beyond what was analyzed in the GP FEIR.

b) The Sebastopol Planning Area is located within the San Francisco Bay Area Air Basin. The region is designated non-attainment for ozone and PM2.5 under the California Ambient Air Quality Standards (CAAQS), and for ozone under the National Ambient Air Quality Standards

(NAAQS). The GP FEIR evaluated the potential for GP implementation to result in a cumulatively considerable net increase of criteria pollutants under Impact 3.3-1 and found the impact to be less than significant with the incorporation of GP policies and actions including dust control measures, vehicle trip reduction strategies, and energy-efficiency standards for new development. The proposed project is a small-scale, 39-home residential infill development consistent with the GP's MDR land use designation. Project construction activities would involve demolition of an existing single-story religious facility, site grading, and construction of residential structures on a 2.69-acre parcel. Construction activity would be short-term in duration (approximately 18 months) and limited in scale relative to the thresholds established by the BAAQMD for evaluating air quality significance. Construction equipment would be conditioned to comply with applicable California Air Resources Board (CARB) emission standards for off-road engines. Dust control measures consistent with GP Action COS-7g would be implemented during all grading and earthmoving activities, including watering of disturbed soils, covering of haul trucks, and sweeping of paved access roads. Project operational emissions would be generated primarily by residential vehicle trips, natural gas combustion for space and water heating, and area sources (landscaping, consumer products). Because the project replaces an existing use (a religious facility that generated vehicle trips to the site) with residential uses at a density consistent with the GP, the net increase in operational emissions attributable to the project, as conditioned, would be marginal relative to existing conditions. The small scale of the project (2.69 acres, 39 homes), the absence of industrial or high-emission uses, and the project's consistency with the GP's planned land use pattern all support the conclusion that the proposed project would not result in a cumulatively considerable net increase of criteria pollutants beyond what was contemplated and found less than significant in the GP FEIR. No project-specific significant impact peculiar to this parcel has been identified.

c) Impacts related to health risks associated with toxic air contaminants (TACs) resulting from implementation of the GP were evaluated under Impact 3.3-2 on pages 3.3-31 to 3.3-32 of the GP DEIR and found to be less than significant. The GP includes policies intended to minimize exposure of sensitive receptors to TACs, consistent with BAAQMD recommendations. Sensitive receptors are located within the vicinity of the project site, including existing residences along Valentine Avenue and surrounding streets. Sensitive receptors include children, the elderly, and individuals with chronic health conditions. During project construction, diesel particulate matter (DPM) from heavy construction equipment represents the primary TAC of concern. However, construction activity at the 8100 Valentine site would be limited in duration (approximately 18 months) and scale (a 2.69-acre infill parcel). The use of construction equipment meeting current CARB Tier standards, combined with implementation of GP dust control policies, would minimize DPM and PM2.5 concentrations at nearby receptors. State Route 12, which passes through the project vicinity, is identified in the BAAQMD's mobile source risk tools as a source of existing TAC risk in the area; however, the GP FEIR evaluated this context at the planning level and found cumulative health risks to be less than significant. The proposed project would not introduce any new stationary TAC sources, such as industrial equipment, dry cleaning operations, or large diesel generators, that could create localized toxic air contaminant impacts. The residential nature of the proposed project, its small scale, and its consistency with the GP's planned land use designations support the conclusion that the proposed project would not expose sensitive receptors to substantial pollutant concentrations beyond those identified and evaluated in the GP FEIR. No project-specific significant impact peculiar to this parcel has been identified.

d) The GP DEIR identified that common odor sources in the Sebastopol Planning Area may include natural sources (e.g., stagnant water, decomposing organic matter) and temporary construction-related activities such as asphalt paving and equipment exhaust. Wastewater from Sebastopol is conveyed to Santa Rosa for treatment, and the GP DEIR identified no industrial or commercial

uses in the City's Planning Area expected to cause nuisance odors. The proposed project involves demolition of an existing religious facility and construction of a 39-home residential subdivision. Construction activities would generate temporary odors from diesel exhaust, asphalt paving, and architectural coatings. These temporary odors are consistent with the types of construction-related odor sources contemplated in the GP FEIR and were found to be less than significant at the plan level. The project's operational phase would generate only typical residential odors (e.g., cooking, landscaping), which are characteristic of the surrounding medium-density residential neighborhood and would not adversely affect a substantial number of people. The project does not include any restaurant, commercial cooking, or industrial land uses that could generate persistent or concentrated odors. No project-specific significant impact peculiar to this parcel related to odors has been identified beyond what was analyzed in the GP FEIR.

Conclusion

As discussed above, no air quality impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

4. Biological Resources

	BIOLOGICAL RESOURCES — Would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GP FEIR*	*Off-Site or Cumulative Impact not Identified by GP FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR*
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No	No	No	No
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No	No	No	No
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No	No	No	No
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No	No	No	No

Discussion

a) The GP FEIR determined that future development within the Planning Area could affect special-status species and sensitive habitats; however, implementation of General Plan Conservation and Open Space policies, together with compliance with applicable state and federal regulations, would reduce impacts to a less-than-significant level.

The proposed project consists of redevelopment of an existing developed property at 8100 Valentine Avenue that is currently occupied by a former church facility, parking areas, landscaping, and associated site improvements. The project site is located within the City's urbanized area and is designated Medium Density Residential (MDR) under the General Plan. Development of the site for residential purposes is consistent with the land use assumptions evaluated in the GP FEIR.

No biological studies have been prepared or provided as part of this CEQA Section 15183 review. Based on the developed nature of the site and the absence of identified sensitive habitats on the property, the project, as conditioned, does not present unique biological conditions that differ from the types of residential infill development analyzed in the GP FEIR. Consistent with General Plan policies and applicable regulations, any future construction activity would remain subject to requirements protecting nesting birds and other biological resources, if encountered. Therefore, no project-specific impact peculiar to the site has been identified.

b) The GP FEIR evaluated impacts to riparian habitat and other sensitive natural communities and concluded that implementation of General Plan policies requiring protection of environmentally sensitive habitat areas, riparian corridors, wetlands, and associated buffers would reduce impacts to less-than-significant levels.

The 8100 Valentine Avenue project site is a previously developed urban property. The project site does not contain known riparian habitat, wetlands, streams, or other sensitive natural communities. The project would occur within an area designated and planned for urban residential development under the General Plan. Because no riparian habitat or sensitive natural communities are known to occur on the project site, and because the project would remain subject to applicable General Plan policies and regulatory requirements, the project would not result in impacts beyond those evaluated in the GP FEIR.

c) The GP FEIR recognized that future development projects within the Planning Area could affect wetlands or other jurisdictional waters where such resources are present. The GP FEIR concluded that compliance with federal, state, and local regulations governing jurisdictional waters and wetlands would reduce impacts to a less-than-significant level.

The project site is a previously developed urban parcel containing existing buildings, parking areas, and landscaping. No wetlands, waters of the United States, or other jurisdictional aquatic resources have been identified on the project site as part of this review. The project, as conditioned, would be required to comply with all applicable local, state, and federal requirements should any jurisdictional resources be identified during future permitting or construction activities. Accordingly, no project-specific impact beyond those analyzed in the GP FEIR has been identified.

d) The GP FEIR evaluated impacts to wildlife movement corridors, migration routes, and nursery sites and concluded that implementation of General Plan conservation policies would reduce impacts to less-than-significant levels.

The project site is located within an established urban residential area and consists primarily of previously disturbed and developed land. Development of the property with residential uses consistent with the General Plan would not substantially alter regional wildlife movement patterns or impede established wildlife corridors. The project does not contain features known to function as significant wildlife movement corridors or nursery sites. Therefore, the project would not create impacts beyond those evaluated in the GP FEIR.

The GP FEIR determined that future development would be subject to local policies and ordinances intended to protect biological resources, including the City's Tree Protection Ordinance and applicable General Plan conservation policies.

As conditioned the proposed project would be required to comply with all applicable provisions of the Sebastopol Municipal Code, including Chapter 8.12 (Tree Protection), and obtain any permits required by the City for removal of protected trees. Compliance with these requirements would ensure consistency with local biological resource protection policies. Therefore, no project-specific impact beyond those considered in the GP FEIR has been identified.

The GP FEIR determined that no adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or similar habitat conservation plan applies to the City of Sebastopol Planning Area in a manner that would affect implementation of the General Plan.

The proposed project would not conflict with any adopted habitat conservation plan, natural community conservation plan, or similar conservation program. No project-specific impact has been identified.

Conclusion

Based on the analysis contained in the City of Sebastopol General Plan Update FEIR and the developed urban character of the 8100 Valentine Avenue site, no biological resource impacts peculiar to this project

or site were identified, no significant off-site or cumulative impacts beyond those previously evaluated in the GP FEIR were found, and no new information indicates more severe impacts. As conditioned, the project is consistent with the General Plan land use designation and applicable conservation policies. No additional biological resources analysis is required under CEQA Guidelines Section 15183.

5. Cultural Resources

CULTURAL RESOURCES — Would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GP FEIR*	*Off-Site or Cumulative Impact not Identified by GP FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR*
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	No	No	No	No
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	No	No	No	No
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	No	No	No	No

Discussion

a,b) Impacts related to substantial adverse change in the significance of a historical resource or archaeological resource pursuant to CEQA Guidelines Section 15064.5 that would result from implementation of the GP were evaluated under Impact 3.5-1 on pages 3.5-15 to 3.5-20 of the GP DEIR. The analysis determined that a substantial adverse change in the significance of a historical resource is defined at Section 15064.5 (b)(1) of the CEQA Guidelines as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The analysis determined that known historical and prehistoric resource sites are located throughout Sebastopol and the City's Planning Area, and it is expected that additional undiscovered sites may be located in various areas of the City as well. The analysis determined that future development allowed under the GP could affect known historical and archaeological resources or unknown historical and archaeological resources which have not yet been identified. The analysis determined that prehistoric Native American sites are most likely to occur where several environmental factors combine to provide readily available resources, such as at the interface between valley and hills.

The analysis determined that future development projects considered by the City would be evaluated for conformance with the City's General Plan, Municipal Code, and other applicable state and local regulations. The analysis identified that the GP includes policies and actions that would reduce impacts to cultural, historical, and archaeological resources. Policies COS 10-5, COS 10-6, CD 3-1, and CD 3-2 encourage the protection and preservation of cultural and historical resources. Action COS-10c addresses the discovery of significant archaeological and historical resources during construction and grading activities, requiring that development work be stopped in the event of a discovery and that appropriate measures be implemented to protect the resource. The analysis concluded that implementation of GP policies and action measures, as well as state and local regulations, would reduce impacts to significant historical and archaeological resources to a less than significant level.

Archaeological Resources

The GP FEIR evaluated impacts to archaeological resources under Impact 3.5-1. The analysis determined that known historical and prehistoric resource sites are located throughout Sebastopol and the Planning Area, and that additional undiscovered sites may be present in various areas of

the City. The GP FEIR found that future development projects could affect known or unknown historical and archaeological resources, and that prehistoric Native American sites are most likely to occur where environmental factors combine to provide readily available resources, such as at the interface of valley and hills. The analysis concluded that implementation of GP policies and action measures—including Policies COS 10-5, COS 10-6, CD 3-1, and CD 3-2, which encourage protection and preservation of cultural and historical resources, and Action COS-10c, which requires work stoppage upon discovery of significant archaeological resources during grading and construction—as well as applicable state and local regulations, would reduce impacts to significant historical and archaeological resources to a less-than-significant level.

In addition, GP Policy COS-10-1 requires that a records search be conducted at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) prior to approval of development projects that could disturb cultural resources, and Action COS-10b requires completion of a pedestrian field survey where a records search indicates potential for cultural resources. These requirements are intended to ensure that project-level impacts to archaeological resources are identified and evaluated prior to ground disturbance.

The City initiated a Cultural Resources search with the Northwest Information Center on July 14, 2026, NWIC File#26-0071 which was returned to City staff on July 20, 2026. This search concluded that there were no previous cultural resource studies for the site. Additionally, it was noted that the site has a low possibility of containing unrecorded archeological sites, but it was recommended the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values. In accordance with GP Policy COS-10-1 and Action COS-10b, the project applicant will be required to complete a records search at the NWIC and, where warranted by the results of that search, a pedestrian field survey conducted by a qualified archaeologist prior to project approval. Should archaeological resources be identified, the project will be subject to the requirements of CEQA Guidelines Section 15064.5, applicable GP policies and actions, and the City of Sebastopol Municipal Code. With implementation of these requirements, as well as Action COS-10c and applicable state and local regulations, potential impacts to archaeological resources would be reduced to a less-than-significant level, consistent with the GP FEIR's conclusions.

c) Impacts related to disturbance of human remains that would result from implementation of the GP were evaluated under Impact 3.5-2 on pages 3.5-20 to 3.5-21 of the GP DEIR. The analysis determined that indications are that humans have occupied areas along the Laguna de Santa Rosa, east of Sebastopol, for at least 11,000 years and it is not always possible to predict where human remains may occur outside of formal burials. Therefore, excavation and construction activities allowed under the GP may yield human remains that may not be marked in formal burials. Future development projects would be evaluated for conformance with the City's General Plan, Municipal Code, and other applicable state and local regulations. Public Resources Code Section 5097 has specific stop-work and notification procedures to follow in the event that Native American human remains are inadvertently discovered during development activities. GP Policy COS 10-2 requires that human remains be treated with sensitivity and dignity and ensures compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. GP Action COS-10c identifies specific steps required upon inadvertent discovery during construction. The GP FEIR concluded that implementation of these policies and actions would ensure that potential adverse impacts to human remains would be less than significant. As conditioned, the proposed project would adhere to all applicable laws, regulations, and policies regarding human remains.

Conclusion

As discussed above, no cultural resource impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

6. Energy

ENERGY — Would the project:		*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GP FEIR*	*Off-Site or Cumulative Impact not Identified by GP FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR*
a.	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	No	No	No	No
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No	No	No	No

Discussion

a) The City of Sebastopol GP FEIR evaluated energy use associated with future development anticipated under the General Plan. The GP FEIR concluded that implementation of General Plan policies promoting energy-efficient building design, transportation alternatives, and resource conservation would reduce energy impacts associated with future development.

The proposed project consists of redevelopment of an existing developed property at 8100 Valentine Avenue with residential uses consistent with the Medium Density Residential (MDR) General Plan designation and R-4 zoning district. Construction activities would require temporary consumption of fuel and electricity typical of residential development projects. Operational energy demand would consist primarily of residential electricity and natural gas usage, appliance operation, lighting, and vehicle trips.

No project-specific energy analysis has been provided as part of this CEQA Section 15183 review. The project, as conditioned, would be required to comply with all applicable California Building Energy Efficiency Standards and local requirements in effect at the time of construction. The project does not include energy-intensive industrial, manufacturing, or processing uses. Accordingly, no project-specific energy impacts beyond those evaluated in the GP FEIR have been identified.

b) The GP FEIR determined that future development consistent with the General Plan would support implementation of state and local energy-efficiency objectives.

The proposed project would be required to comply with applicable state energy regulations and local development requirements. The project, as conditioned, is consistent with the land use assumptions evaluated in the GP FEIR and would not conflict with any adopted renewable energy or energy efficiency plan.

Conclusion

Based on the GP FEIR and the project's consistency with applicable regulations, no energy impacts peculiar to this site were identified, no significant off-site or cumulative impacts beyond those previously evaluated were found, and no new information indicates more severe impacts. No additional energy analysis is required under CEQA Guidelines Section 15183.

7. Geology and Soils

GEOLOGY AND SOILS — Would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GP FEIR*	*Off-Site or Cumulative Impact not Identified by GP FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR*
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	No	No	No	No
ii. Strong seismic ground shaking?	No	No	No	No
iii. Seismic-related ground failure, including liquefaction?	No	No	No	No
iv. Landslides?	No	No	No	No
b. Result in substantial soil erosion or the loss of topsoil?	No	No	No	No
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	No	No	No	No
d. Be located on expansive or corrosive soil creating substantial direct or indirect risks to life or property?	No	No	No	No
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No	No	No	No
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No	No	No	No

Discussion

a) The City of Sebastopol General Plan Update Final Environmental Impact Report (GP FEIR) evaluated geology and seismic hazards associated with future development throughout the Planning Area. The GP FEIR concluded that future development could be exposed to regional seismic hazards, including ground shaking associated with earthquakes occurring on faults in the greater San Francisco Bay Area region. However, the GP FEIR determined that compliance with applicable provisions of the California Building Code, City development standards, and site-specific engineering review requirements would reduce impacts to less-than-significant levels.

The proposed project consists of redevelopment of an approximately 2.69 acre developed urban parcel located at 8100 Valentine Avenue with a residential subdivision containing 20 single-family residences and 19 accessory dwelling units, for a total of 39 residential units. The site is

currently developed with a church facility, parking areas, landscaping, and associated improvements and is designated Medium Density Residential (MDR) and zoned R-4. The project, as conditioned, represents the type and intensity of residential development anticipated and evaluated in the GP FEIR.

No geotechnical investigation has been provided as part of this CEQA Guidelines Section 15183 review. Consistent with the GP FEIR, all future structures would be required to comply with the California Building Code and all applicable City requirements governing seismic design and structural safety. Compliance with these requirements would ensure that potential impacts associated with seismic hazards are addressed through project design and engineering review. Therefore, no peculiar seismic impact associated with the project site has been identified.

b) The GP FEIR evaluated erosion and sedimentation impacts associated with future development and concluded that compliance with grading, drainage, stormwater, and erosion-control requirements would reduce impacts to less-than-significant levels.

The proposed project would involve temporary grading and construction activities typical of residential development. Construction activities would be required to comply with applicable City requirements, National Pollutant Discharge Elimination System (NPDES) regulations, and best management practices intended to minimize erosion and sediment transport during construction. Following construction, developed areas would be stabilized through building construction, landscaping, paving, and stormwater improvements.

As conditioned, the project would not result in erosion impacts beyond those evaluated in the GP FEIR.

c) The GP FEIR determined that portions of the Planning Area may be subject to geologic and soil constraints and that future development projects would be required to comply with applicable engineering standards and building regulations.

The project site is a previously developed urban property currently occupied by buildings and associated site improvements. No information has been provided indicating the presence of unusual geologic conditions, landslide hazards, or unstable soil conditions that would create impacts peculiar to the site. Any future development would be subject to standard engineering review and building permit requirements intended to address site stability and structural safety.

Therefore, no project-specific impacts related to unstable soils beyond those analyzed in the GP FEIR have been identified.

d) The GP FEIR recognized that expansive soils may occur in portions of the Planning Area and concluded that compliance with applicable engineering standards and building code requirements would reduce impacts to less-than-significant levels.

No geotechnical report has been provided identifying expansive soils on the project site. Any expansive soil conditions encountered during project design or construction would be addressed through compliance with applicable engineering, foundation design, and building code requirements. Therefore, no project-specific impact beyond those evaluated in the GP FEIR has been identified.

The proposed project would connect to the existing City sanitary sewer collection system and does not propose any septic tanks or alternative wastewater disposal systems. There would be no impact under this significance criterion.

e) The proposed project would be served by the City of Sebastopol sanitary sewer system and would not utilize septic tanks or alternative wastewater disposal systems. A preliminary sewer capacity study prepared for the project indicates that the development would connect to the municipal sewer system and that adequate sewer capacity is available. Therefore, this issue does not apply to the project.

f) The GP FEIR evaluated the potential for disturbance of previously unknown paleontological resources during ground-disturbing activities associated with future development. The GP FEIR concluded that compliance with applicable state laws and General Plan policies requiring appropriate treatment of resources encountered during construction would reduce impacts to less-than-significant levels.

The project site is a previously disturbed and developed urban parcel. No paleontological resources or unique geologic features have been identified on the site. In the event that previously unknown paleontological resources are encountered during construction, appropriate measures consistent with applicable regulations and General Plan policies would be implemented.

Accordingly, no project-specific paleontological or geologic resource impacts beyond those evaluated in the GP FEIR have been identified.

Conclusion

Based on the GP FEIR, the developed urban character of the site, and required compliance with applicable building, grading, and engineering standards, no geology or soils impacts peculiar to this project or site were identified, no significant off-site or cumulative impacts beyond those previously evaluated were found, and no new information indicates more severe impacts. No additional geology and soils analysis is required under CEQA Guidelines Section 15183.

8. Greenhouse Gas Emissions

GREENHOUSE GAS EMISSIONS — Would the project:		***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GP FEIR***	***Off-Site or Cumulative Impact not Identified by GP FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR***
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	No	No	No	No
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No	No	No	No

Discussion

a) The GP FEIR evaluated GHG emissions under Impact 3.7-1. The analysis determined that the GP and its policies and actions would encourage the development of a compact urban community while preserving agricultural and open space resources in the Planning Area. The analysis found that implementation of the GP would result in increased employment opportunities, expanded transportation and transit options, and the incorporation of energy efficiency into new development. The GP was found to be consistent with policy guidance from CAPCOA and the BAAQMD and would assist the state in meeting the GHG reduction goals established by Assembly Bill 32 (AB 32). The GP FEIR concluded that implementation of the GP would result in an estimated 62 percent reduction in GHG emissions compared to existing conditions and that the impact would be less than significant.

No project-specific GHG emissions study has been completed for the 8100 Valentine Avenue project at this time. The project, as conditioned, consists of infill residential redevelopment of a previously developed 2.69-acre site within the City's urbanized area, consistent with the GP's Medium Density Residential (MDR) land use designation and R-4 zoning. Construction of the proposed project would generate temporary GHG emissions typical of standard residential construction activities, including combustion of diesel fuel by construction equipment and gasoline for worker commutes. These construction-level emissions would be consistent with the types and scales of development activity anticipated under the GP and evaluated in the GP FEIR. No unusual or atypical GHG emission sources are associated with the proposed project. Because the project, as conditioned, is consistent with the land use assumptions evaluated in the GP FEIR, construction-phase GHG emissions would be at or below levels anticipated for development of this type and density and would be considered less than significant, consistent with the GP FEIR's conclusions. With compliance with the City's applicable Electrical, Energy, and Green Building Standards, the project would also be consistent with the City's CCAP and the 2022 Climate Action Framework.

Accordingly, no project-specific significant GHG impact peculiar to this parcel has been identified beyond what was analyzed in the GP FEIR.

b) Regarding conflicts with GHG reduction plans, the GP FEIR evaluated this under Impact 3.7-2 and determined that the GP's policies are consistent with the City's Climate Change Action Plan (CCAP) and would assist in meeting regional GHG reduction goals. The GP FEIR further determined that compliance with the City's Electrical, Energy, and Green Building Standards would reduce GHG emissions from future development to the greatest extent feasible and ensure consistency with applicable plans and policies adopted for the purpose of reducing GHG emissions. The City subsequently adopted the Sebastopol Climate Action Framework in July 2022, which establishes a goal of reaching net zero emissions by 2030 and references the General Plan policies already evaluated in the GP FEIR.

   No project-specific GHG emissions study has been completed for the 8100 Valentine Avenue project at this time. The project, as conditioned, consists of infill residential redevelopment of a previously developed 2.69-acre site within the City's urbanized area, consistent with the GP's Medium Density Residential (MDR) land use designation and R-4 zoning. Construction of the proposed project would generate temporary GHG emissions typical of standard residential construction activities, including combustion of diesel fuel by construction equipment and gasoline for worker commutes. These construction-level emissions would be consistent with the types and scales of development activity anticipated under the GP and evaluated in the GP FEIR. No unusual or atypical GHG emission sources are associated with the proposed project. Because the project, as conditioned, is consistent with the land use assumptions evaluated in the GP FEIR, construction-phase GHG emissions would be at or below levels anticipated for development of this type and density and would be considered less than significant, consistent with the GP FEIR's conclusions. With compliance with the City's applicable Electrical, Energy, and Green Building Standards, the project would also be consistent with the City's CCAP and the 2022 Climate Action Framework.

   Accordingly, no project-specific significant GHG impact peculiar to this parcel has been identified beyond what was analyzed in the GP FEIR.

Conclusion

As discussed above, no GHG impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

9. Hazards and Hazardous Materials

HAZARDS AND HAZARDOUS MATERIALS—Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GP FEIR***	***Off-Site or Cumulative Impact not Identified by GP FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR***
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No	No	No	No
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	No	No	No	No
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No	No	No	No
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No	No	No	No
e. For a project located within an airport land use plan or within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No	No	No	No
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No	No	No	No
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	No	No	No	No

Discussion

a) GP DEIR Impact 3.8-1 evaluated hazards associated with the routine transport, use, and disposal of hazardous materials and reasonably foreseeable accidental releases. The analysis noted that hazardous materials use is regulated by local fire departments, CUPAs, Cal/OSHA, and DTSC, and concluded that compliance with applicable GP policies and state and federal regulations would reduce these impacts to less than significant.

During project construction, equipment and materials would include fuels, oils and lubricants, solvents, cements and adhesives, paints and thinners, degreasers, and asphalt mixtures, all of which are commonly used in construction. Contractors would be required to prepare and implement Hazardous Materials Business Plans (HMBPs) to ensure that hazardous materials are used properly and stored in appropriate containers with secondary containment. As discussed in Sections 7 (Geology and Soils) and 10 (Hydrology and Water Quality) of this document, the construction contractor would also be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) that would list the hazardous materials proposed for use, describe spill prevention measures and equipment inspections, and describe BMPs for controlling site runoff. Transportation of hazardous materials would be regulated by USDOT, Caltrans, and the CHP. Required compliance with these laws and regulations would limit the potential for creation of hazardous conditions during construction, and this impact would be less than significant.

b) Once constructed, the 8100 Valentine Avenue residential project would involve the use of common hazardous materials typical of residential uses, such as household cleaning products, paints, garden chemicals, and solvents. These materials would be consumed through use, resulting in relatively little waste, and would be used in small quantities consistent with typical single-family residential and HOA operations. Routine maintenance of HOA-managed common areas may involve minor quantities of landscape maintenance materials. For these reasons, operation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. This impact would be less than significant.

c) GP DEIR Impact 3.8-2 evaluated hazardous emissions and materials handling within one-quarter mile of schools and found that compliance with applicable regulations and GP policies would reduce the impact to less than significant. The nearest school to the proposed project is Brook Haven Middle School, located on Valentine Avenue, approximately 0.3 mile from the project site. Required compliance with the laws and regulations governing transportation, use, handling, and disposal of hazardous materials would ensure that hazardous conditions during construction and operation would be less than significant. Therefore, the proposed project would have a less-than-significant impact related to hazardous emissions or materials within 0.25 mile of a school.

d) GP DEIR Impact 3.8-3 evaluated development on Government Code Section 65962.5 hazardous materials sites and found that compliance with state and federal regulations would reduce impacts to less than significant. A review of the DTSC EnviroStor database and the SWRCB GeoTracker database confirms that no active hazardous materials sites are located within, adjacent to, or within 1,000 feet of the project site. The project site was previously occupied by a religious facility (LDS Church) with no identified history of hazardous materials use or underground storage tanks. There would be no impact under this significance criterion.

e) As discussed under Impact 3.8-4 of the GP DEIR, the City of Sebastopol does not have any airport facilities located within the city limits, sphere of influence, or urban growth boundary. The closest airport is Charles M. Schulz–Sonoma County Airport, located approximately 11 miles north of the City of Sebastopol. There would be no impact under this significance criterion.

f) GP DEIR Impact 3.8-5 evaluated the potential to impair emergency response or evacuation plans and concluded that GP policies ensuring regular review of emergency access routes and public information would reduce the impact to less than significant. The City of Sebastopol Local Hazard Mitigation Plan (LHMP) was adopted on June 7, 2022, and received final FEMA approval on July 15, 2022. The proposed project includes a 12-foot-wide unobstructed secondary resident evacuation route along the western corridor connecting the end of the private street to Valentine Avenue, to be maintained clear and unobstructed by the HOA. Prior to Final Map recordation, project circulation including; driveway aisle, hammerhead turn around and emergency egress path for residents shall be reviewed and approved by the City Fire Department, Building Department, Public Works Department, and Planning Department for conformance with applicable provisions related to emergency response and emergency evacuation. The proposed project's contribution to traffic conditions during an emergency evacuation would be dispersed within the existing street system and would not substantially impair emergency response or evacuation. This impact would be less than significant.

g) GP DEIR Impact 3.8-6 evaluated wildland fire risk and found no FHSZs within SRAs or VHFHSZs within LRAs in Sebastopol, concluding that GP implementation would have a less than significant impact. The project site is a 2.69-acre urban infill parcel surrounded by established medium-density residential uses and is not adjacent to wildlands or open space capable of supporting wildland fire. Construction and operation of the proposed project would adhere to all applicable state and local

regulations and codes addressing fire safety. This impact would be less than significant.

Conclusion

As discussed above, no hazards or hazardous materials impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

10. Hydrology and Water Quality

HYDROLOGY AND WATER QUALITY — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GP FEIR***	***Off-Site or Cumulative Impact not Identified by GP FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR***
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	No	No	No	No
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No	No	No	No
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
1. result in substantial erosion or siltation on- or off-site	No	No	No	No
2. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	No	No	No	No
3. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	No	No	No	No
4. impede or redirect flood flows?	No	No	No	No
5. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No	No	No	No
6. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No	No	No	No

Discussion

a) GP DEIR Impact 3.9-1 evaluated the potential for GP buildout to violate water quality standards or waste discharge requirements. The City's stormwater system operates under an NPDES MS4 Phase II permit, and the Santa Rosa LID Manual provides guidance for post-construction stormwater controls under GP Action COS-3d. The analysis concluded that compliance with NPDES requirements, the LID Manual, and applicable GP water quality policies would reduce impacts to less than significant.

Grading, excavation, and other activities associated with construction of the proposed project could temporarily increase runoff, erosion, and sedimentation. Because the proposed project would disturb greater than one acre, it is subject to coverage under the NPDES Construction General Permit, which would require the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that would require compliance with best management practices (BMPs) such as settlement basins, silt fences, and straw wattles to prevent sediment and other pollutants from leaving the work site and entering waterways. Therefore, impacts relative to water quality during construction would be less than significant.

The proposed project would redevelop the 8100 Valentine Avenue site, which is currently developed with an existing religious facility building and associated parking areas. The proposed project would reduce total impervious surface from approximately 85,000 square feet under existing conditions to approximately 66,000 square feet, improving rainwater infiltration opportunities on-site. Two on-site bioretention basins, the first measuring 4,200 square feet located adjacent to Valentine Avenue and the second measuring 1,290 located within the corner turning area of the development would collect and treat site runoff prior to discharge to the existing 12-inch municipal storm drain along the eastern property line, consistent with GP Policy COS 3-6, which requires the use and design integration of natural features such as bioswales, vegetation, and retention areas to remove surface water pollutants prior to discharge into surface waters. The project's required compliance with applicable federal, state, and local regulations and policies would ensure that operational impacts related to water quality would be less than significant.

b) GP DEIR Impact 3.9-2 evaluated groundwater supply and recharge impacts from GP buildout. The analysis found that GP Conservation and Open Space and Community Services policies - including Policy COS 5-3 (groundwater recharge), COS 5-4 (permeable surfaces), and CSF 3-1 (water supply verification) - would reduce impacts to less than significant. The proposed project would reduce total impervious surface relative to existing conditions and two on-site bioretention basins would further contribute to groundwater recharge, consistent with GP Policy COS 5-4. This impact would be less than significant.

c) GP DEIR Impact 3.9-3 evaluated drainage pattern alteration impacts from GP buildout. The analysis found that GP Policies COS 3-5 (BMP integration), COS 3-6 (bioswales and retention), and COS 3-8 (creek and wetland buffers) would ensure a less than significant impact. Construction of the proposed project would be subject to the NPDES Construction General Permit and associated SWPPP requirements. The project design integrates two bioretention basins, street-side landscaping, and permeable surfaces consistent with GP Policies COS 3-6 and COS 5-4. The project reduces overall impervious surface compared to existing conditions and would not substantially alter drainage patterns in a manner resulting in erosion, flooding, or polluted runoff. Impacts related to drainage pattern alteration would be less than significant.

1,6) Water quality impacts related to flood hazard, tsunami, or seiche zones in relation to implementation of the GP were addressed under Impact 3.9-6 on pages 3.9-37 to 3.9-38 of the GP DEIR. The analysis concluded that the Planning Area is sufficiently distant from San Francisco Bay to preclude tsunami effects, and is not located within close proximity to a confined water body that would pose a significant seiche risk. The GP Safety Element includes numerous policies to address flood hazards, including Policy SA 2-8, which requires all development projects to demonstrate how stormwater runoff will be detained, treated, and conveyed to the nearest drainage facility without increasing peak flow runoff or creating potential for offsite flooding. The 8100 Valentine Avenue project site is located in a FEMA Flood Zone AE, which is subject to 100-year flooding. All habitable floor areas of the proposed homes would be elevated in conformance with the requirements of Title 15, Chapter 15.16 (Flood Damage Protection) of the Sebastopol Municipal Code. The project would comply with GP Policy SA 2-8 and would not result in any new or more severe site-specific impacts beyond those identified in the GP FEIR with respect to flood hazards. This impact would not be a project-specific significant impact peculiar to this parcel.

As discussed above under question (a), construction of the proposed project would be subject to the NPDES Construction General Permit, requiring preparation and implementation of a SWPPP with BMPs to prevent sediment and other pollutants from entering waterways. The project's required compliance with applicable federal, state, and

local regulations and policies would ensure that operational impacts related to water quality would be less than significant. As discussed above under question (b), the proposed project would reduce impervious surfaces and includes on-site bioretention facilities. Consequently, the proposed project, as conditioned, would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This impact would be less than significant.

Conclusion

As discussed above, no hydrology or water quality impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

11. Land Use and Planning

	LAND USE AND PLANNING — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GP FEIR***	***Off-Site or Cumulative Impact not Identified by GP FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR***
a.	Physically divide an established community?	No	No	No	No
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	No	No	No	No

Discussion

a) GP DEIR Impact 3.10-1 evaluated the potential for GP buildout to physically divide an established community. The analysis found that GP land uses direct growth to infill locations and areas adjacent to existing communities without creating physical divisions, concluding the impact would be less than significant. The proposed project would construct 39 for-sale homes on 20 lots as a contiguous infill development on a single 2.69-acre parcel within an established residential neighborhood. The project accesses Valentine Avenue through a single private entrance and does not introduce any new through-roadways, physical barriers, or infrastructure features that would divide the surrounding community or substantially alter existing circulation and access patterns. This impact would be less than significant.

GP DEIR Impact 3.10-2 evaluated the potential for conflicts with land use plans, policies, or regulations adopted to mitigate environmental effects. The analysis found that future development projects would be required to comply with all applicable policies and standards and concluded that any such impacts would be less than significant.

The project site is designated Medium Density Residential (MDR) on the City of Sebastopol General Plan Land Use Map. The MDR designation is applicable to single-family residential areas with densities up to 8.7 units per acre and provides for a range of housing types consistent with the established residential character of surrounding neighborhoods. The site is zoned R-4 (Medium-Density Residential) under Title 17 of the Sebastopol Municipal Code. The purpose of the R-4 District is to implement the MDR land use category of the General Plan. Single-family dwellings and accessory dwelling units (ADUs) are permitted by right in the R-4 district consistent with Section 17.220 of the Sebastopol Municipal Code.

The proposed project's base density of 7.43 lots per acre (20 lots on 2.69 acres) falls within the maximum density of 8.7 dwelling units per acre permitted in the R-4 zone. Pursuant to Government Code Sections 66314(c) and 66319, ADUs do not count toward density for purposes of zoning compliance or General Plan density requirements. The project seeks waivers from certain development standards pursuant to Government Code Section 65915(e) (State Density Bonus Law) where such standards would otherwise physically preclude construction of the proposed residential community, including the inclusionary affordable units. Development standard deviations achieved through waivers and concessions granted under State Density Bonus Law do not disqualify the project from consistency with the General Plan or zoning designation. The project, as conditioned,

includes three of the 20 primary dwelling units designated as inclusionary affordable units for households earning 120% or less of Area Median Income (AMI), satisfying the requirements of Sebastopol Municipal Code Section 17.250.050.A.1. The proposed project is consistent with the General Plan.

b) CEQA does not consider inconsistency with land use plans and policies to be a physical effect on the environment unless the plan or policy was adopted for the purpose of avoiding or mitigating a significant environmental effect. Adverse physical effects on the environment that could result from construction and operation of the proposed project are evaluated and disclosed in the appropriate topical sections of this document. As discussed in those analyses, the proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This impact would be less than significant.

Conclusion

As discussed above, no land use or planning impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

12. Mineral Resources

MINERAL RESOURCES — Would the project:		***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GP FEIR***	***Off-Site or Cumulative Impact not Identified by GP FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR***
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No	No	No	No
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No	No	No	No

Discussion

a) GP DEIR Impact 3.6-6 evaluated the potential for GP buildout to result in the loss of known or locally important mineral resources. The analysis found that no MRZ-2 deposits exist within Sebastopol, the majority of the Planning Area is classified MRZ-1, and the Planning Area is not designated as a mineral resource recovery site. The impact was found to be less than significant. The project site is a 2.69-acre urban infill parcel designated Medium Density Residential (MDR) and zoned R-4 within the City's established residential fabric. The site contains no identified mineral resources and is not located on or adjacent to any MRZ-2 or MRZ-3 designated lands.

b) The proposed project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. There would be no impact under these significance criteria.

Conclusion

As discussed above, no mineral resource impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

13. Noise and Vibration

NOISE — Would the project result in:		*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GP FEIR*	*Off-Site or Cumulative Impact not Identified by GP FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR*
a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	No	No	No	No
b.	Generation of excessive groundborne vibration or groundborne noise levels?	No	No	No	No
c.	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No	No	No	No

Discussion

a) GP DEIR Impact 3.11-1 evaluated traffic noise increases associated with GP buildout and found that localized noise increases along roadways where existing levels already exceed 65 dBA Ldn would be significant and unavoidable.

The proposed project is estimated to generate approximately 319 average daily trips (ADT) based on ITE Land Use Code 210 (Single-Family Detached Housing) for the 20 primary dwelling units, with additional trips associated with ADU occupants. Project trips would primarily access the site via Valentine Avenue, a local residential street with a posted speed limit of 25 miles per hour. Using algorithms from the Federal Highway Administration's Traffic Noise Model, the addition of project-generated trips to the existing traffic volume on Valentine Avenue and Sebastopol Avenue (SR-12) would result in a negligible increase in ambient noise levels, well below the 3 dBA significance threshold established under GP Policy N 1-7. This impact would be less than significant.

GP DEIR Impact 3.11-2 evaluated stationary noise source impacts from GP buildout and found that, with implementation of relevant GP noise policies (N 1-1, N 1-3 through N 1-8, N 1-11, N 2-1, N 2-3), the impact would be less than significant.

Stationary noise sources associated with the proposed project would be limited to heating, ventilation, and air conditioning (HVAC) systems and typical outdoor residential activities. Table N-2 of the GP and Section 8.25.060 of the Municipal Code establish a daytime (7 a.m. to 10 p.m.) noise standard of 55 dBA, Leq at residential uses and a nighttime standard (10 p.m. to 7 a.m.) of 45 dBA, Leq. GP Policy N 1-7 provides that where existing ambient noise levels already exceed applicable standards, the significance threshold is a 3 dBA increase above existing ambient levels. Residential HVAC systems at typical setback distances from neighboring homes would attenuate to levels below applicable noise standards. However, where residential setbacks are proposed to be waived or reduced, this attenuation cannot be assumed and would need to be verified through a project-specific noise evaluation or through conditions of approval limiting noise generated by individual HVAC systems (e.g., equipment siting, sound-rated units, or decibel limits at the property line). Outdoor residential activities would be limited to daytime and early evening hours

consistent with normal neighborhood conditions and would not result in a 3 dBA increase above existing ambient levels. Stationary source noise impacts associated with the proposed project would be less than significant.

GP DEIR Impact 3.11-3 evaluated construction noise impacts from GP buildout and found that, with implementation of GP noise policies, the impact would be less than significant.

Construction of the proposed project would occur over a period of approximately 18 months.. Project construction would result in temporary increases in ambient noise levels associated with heavy construction equipment such as excavators, compactors, graders, loaders, and trucks. The nearest noise-sensitive receptors are existing residences on Valentine Avenue and on adjacent streets, at distances generally ranging from approximately 50 to 150 feet from active construction areas.

Section 8.25.060 of the City's Noise Control Ordinance exempts construction equipment operated during daytime hours (7:00 a.m. to 8:00 p.m. Monday through Friday; 8:00 a.m. to 5:00 p.m. Saturday and Sunday). As conditioned, all project construction would occur during these permitted hours and would, therefore, be exempt from the restrictions of the noise ordinance. Pursuant to Action N-1f of the GP, the project, as conditioned, would implement the following construction-related noise control measures: noise-generating construction activities shall be limited as specified in the Noise Ordinance; all equipment driven by internal combustion engines shall be equipped with mufflers in good condition and appropriate for the equipment; quiet models of air compressors and other stationary noise sources shall be utilized where available; stationary noise-generating equipment shall be located as far as practicable from sensitive receptors; unnecessary idling of internal combustion engines shall be prohibited; and construction staging areas shall be established at locations creating the greatest feasible distance between construction-related noise sources and noise-sensitive receptors. In light of the Sebastopol Noise Ordinance exemption for daytime construction noise and the construction-related noise control measures required by Action N-1f of the GP, and consistent with the findings of the 2016 GP FEIR, the construction-related noise impacts of the proposed project would be less than significant.

As the project includes a dog park that is within 20 feet of a residential unit, the project shall relocate the current location of the dog park to be consistent with the GP Noise standards. Those standards would be met through distance from sensitive noise receptors (residents), construction methods to attenuate interior noise levels, and limited hours of use for the dog park during nighttime hours.

b) GP DEIR Impact 3.11-4 evaluated groundborne vibration impacts from GP construction activities and found that, with implementation of GP noise policies, the impact would be less than significant. The primary vibration-generating activities associated with the proposed project would occur during grading, placement of underground utilities, and construction of foundations. Activities that would generate excessive vibration, such as blasting or impact pile driving, are not anticipated. According to the Caltrans Transportation and Construction Vibration Guidance Manual, the building damage threshold for historic and some older buildings is 0.25 PPV (in/sec). At distances of 25 feet or greater from the nearest existing structures, vibration levels from typical construction equipment such as large bulldozers (0.042 PPV at 50 feet) and auger drill rigs (0.042 PPV at 50 feet) would be well below this threshold. Project-related construction and operational groundborne vibration impacts would be less than significant.

c) Impacts related to exposure of people to excessive noise levels from airports or private airstrips were not evaluated in the GP DEIR because the city is not located within an airport land use plan or within two miles of a public airport or public use airport. This criterion is not applicable to the proposed project, and there would be no impact with regard to noise exposure from airports.

Conclusion

As discussed above, no noise or vibration impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

14. Population and Housing

	POPULATION AND HOUSING — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GP FEIR***	***Off-Site or Cumulative Impact not Identified by GP FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR***
a.	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No	No	No	No
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No	No	No	No

Discussion

a) GP DEIR Impact 3.10-3 evaluated population growth associated with GP buildout, projecting up to 750 new residential units and a population increase of approximately 1,658 residents. The analysis found that growth under the GP would remain consistent with statewide projections and would not exceed applicable growth limitations, concluding the impact would be less than significant. The proposed project would add 39 for-sale homes (20 primary dwellings and 19 detached ADUs) on an infill site designated for residential development in the Sebastopol General Plan. The project's 39 homes represent approximately 5.2 percent of the 750 new residential units projected under GP buildout. The site is currently occupied by a former religious facility with no residential use. The project targets the "missing middle" for-sale housing market, contributing to the City's RHNA obligations. The project does not extend roads, utilities, or other infrastructure into undeveloped areas that would induce unplanned growth beyond the City's Urban Growth Boundary. Growth associated with the proposed project is consistent with GP projections and policies guiding infill residential development. This impact would be less than significant.

b) There are no residential uses on the 8100 Valentine Avenue project site. The site is currently occupied by a former LDS Church facility, which ceased operations approximately 18 months prior to project application in preparation for sale of the property. The proposed project would not displace any existing residents or housing units, and there would be no need for replacement housing elsewhere. There would be no impact under this significance criterion.

Conclusion

As discussed above, no population or housing impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

15. Public Services

PUBLIC SERVICES — Would the project:		*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GP FEIR*	*Off-Site or Cumulative Impact not Identified by GP FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR*
a.	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
	1. Fire protection?	No	No	No	No
	2. Police protection?	No	No	No	No
	3. Schools?	No	No	No	No
	4. Parks?	No	No	No	No
	5. Other public facilities?	No	No	No	No

Discussion

GP DEIR Impact 3.12-1 evaluated the potential for GP buildout to require new or expanded public service facilities. The analysis found that GP policies ensure adequate service levels, require development to pay its fair share, and prevent growth from outpacing services, concluding the impact would be less than significant. The proposed project is consistent with the GP land use designation for the project site. The project would add 39 for-sale homes accommodating new residents, generating incremental demand for public services consistent with GP projections. The project would pay all applicable development impact fees to fund expanded public services.

1. The City of Sebastopol Planning Department's 2022 Annual Level of Service (LOS) Report indicates that the Sebastopol Fire Department met the National Response Standard for volunteer fire departments. Since this report the City no longer has a volunteer fire department and now is serviced by Goldridge Fire District. The proposed project includes a 12-foot-wide secondary resident evacuation route along the western corridor, maintained by the HOA. Building plans would be reviewed and approved by the Goldridge fire department, building department, public works department, and planning department for conformance with applicable fire safety provisions. The proposed project would not result in the need for new or physically altered fire protection facilities.
2. The Sebastopol Police Department provides law enforcement services within the city. The 2022 LOS Report noted that the Police Department did not meet the 3-minute response time objective for 70 percent of priority calls due to staffing vacancies, but with those vacancies now filled this situation no longer exists. The proposed project would add 39 homes generating typical residential demands on police services consistent with GP projections. The project would not create unusual demands on police services and would not result in the need for new or physically altered police protection facilities.
3. The 2022 LOS Report documents an overall trend of declining enrollment in Sebastopol schools. The proposed project would add 39 for-sale homes, which may include school-aged children. The proposal was routed to the Sebastopol Union School District and the West Sonoma County Union

High School District and no comments were received in response. The project would be required to pay applicable school impact fees pursuant to Government Code Section 65995 to offset any incremental demand on school facilities. The proposed project would not result in the need for new or physically altered school facilities.

4. The 2022 LOS Report indicates that the City has met the General Plan standard for the provision of park facilities, with a parkland ratio of 6.14 acres per 1,000 residents, exceeding the 5-acre standard. The proposed project provides approximately 6,500 square feet of on-site common open space across four distinct open space areas—the Central Green, Redwood Tree Grove, Dog Park, and Community Expression Area the addition of these areas may partially offset the demand on public parks as the project is located within a quarter mile of Willard Libby Park. The project would pay applicable park impact fees. The proposed project would not result in the need for new or physically altered park facilities. The demand for public services associated with the proposed project would be consistent with the GP projections evaluated in the GP FEIR and would be less than significant.
5. The City and Sonoma County also provide other public facilities serving Sebastopol residents, including the Sebastopol Community Center, the Sebastopol Regional Library (part of the Sonoma County Library system), and the Sebastopol Area Senior Center. These facilities serve the city and surrounding region as a whole and are not capacity-constrained by any single residential development. The proposed project would add 39 for-sale homes, generating a proportional incremental increase in the use of these existing facilities consistent with GP population projections evaluated in the GP FEIR. The project would pay applicable development impact fees to help fund public facilities and would not result in the need for new or physically altered community center, library, or senior center facilities.

Conclusion

As discussed above, no public service impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

16. Recreation

RECREATION — Would the project:		*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GP FEIR*	*Off-Site or Cumulative Impact not Identified by GP FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR*
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No	No	No	No
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No	No	No	No

Discussion

a) GP DEIR Impact 3.12-2 evaluated potential deterioration of parks and recreation facilities due to GP buildout. The analysis found that GP policies ensuring maintenance of existing facilities and provision of new facilities to keep pace with growth would reduce the impact to less than significant. The proposed project is consistent with the GP land use designation for the project site. As discussed in Section 14, Population and Housing, of this document, the project would add 39 for-sale homes, accommodating new residents who would generate incremental demand for parks and recreation facilities consistent with GP projections.

The City's 2022 LOS Report confirms that the City has met the General Plan standard for parkland, with a ratio of 6.14 acres per 1,000 residents exceeding the 5-acre standard. The project's incremental residential demand is within the capacity of existing park facilities. The project would pay applicable park impact fees.

b) The proposed project does not include construction or expansion of public recreational facilities. The on-site common open space and private yards provided by the project are part of the residential site plan and would not require significant grading or vegetation removal beyond what is otherwise required for residential construction. The project does not include any recreation facility features that would have an adverse physical effect on the environment. As conditioned, project impacts related to recreation would be less than significant.

Conclusion

As discussed above, no recreation impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

References

City of Sebastopol, 2023. 2022 Annual Level of Service Report (LOS Report), December 19, 2023.

17. Transportation

	TRANSPORTATION — Would the project	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GP FEIR***	***Off-Site or Cumulative Impact not Identified by GP FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR***
a.	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	No	No	No	No
b.	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	No	Yes	No	No
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No	No	No	No
d.	Result in inadequate emergency access?	No	No	No	No

Discussion

a) GP DEIR Impact 3.13-1 evaluated the potential for GP buildout to result in unacceptable levels of traffic operation at City-controlled study intersections and roadway segments and concluded, based on application of the City's Level of Service (LOS) standards, that GP buildout would result in acceptable traffic operations; this impact was found to be less than significant. GP DEIR Impact 3.13-3 evaluated consistency with the Sonoma County Congestion Management Program and found no conflict. GP DEIR Impacts 3.13-7 and 3.13-8 evaluated the GP's consistency with adopted transit, bicycle, and pedestrian plans and found, with implementation of GP Circulation Element policies, that GP buildout would support and be consistent with those plans.

W-Trans prepared a Focused Transportation Impact Study for the proposed project (W-Trans, 2026) addressing trip generation, traffic safety, and access adequacy. Using rates from the ITE Trip Generation Manual, 12th Edition for Single-Family Detached Housing (Land Use 210) for the 20 primary dwelling units, and the "patio home" subset of that land use for the 19 detached ADUs, the study calculated that the proposed project would generate an average of 284 trips per day, including 19 trips (5 in/14 out) during the a.m. peak hour and 28 trips (18 in/10 out) during the p.m. peak hour. This trip generation is a small increment relative to the roadway network's overall capacity and is consistent with the residential development contemplated for the site under the GP's Medium Density Residential land use designation, as evaluated under GP buildout. Vehicular access would be provided via a single driveway on Valentine Avenue at the same location as the existing driveway serving the former church use, and the project would not require new roadway, transit, bicycle, or pedestrian facilities beyond those already contemplated by the GP. The proposed project would not conflict with the GP Circulation Element or any other adopted program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact would be less than significant.

b) The GP FEIR was certified in November 2016, before the statewide transition to vehicle miles traveled (VMT) as the required CEQA metric for evaluating transportation impacts under Senate Bill (SB) 743, which took effect July 1, 2020. Consistent with the methodology in effect at the time, GP DEIR Section 3.13 (Transportation and Circulation) evaluated transportation impacts using intersection and roadway segment level of service (LOS), not VMT. Accordingly, the GP FEIR does not contain an evaluation of consistency with CEQA Guidelines Section 15064.3, subdivision (b).

The W-Trans Focused Transportation Impact Study prepared for the proposed project (W-Trans, 2026) provides project trip generation (284 average daily trips; see discussion under (a), above), but, consistent with

its scope as a focused study of trip generation, traffic safety, and access adequacy, does not include a project-level VMT screening or quantification.

The project site was previously developed with a religious assembly use (LDS Church) that is estimated to have generated on the order of 250 to 300 or more trips per day on a typical weekday, with substantially higher trip generation on Sundays associated with services. The proposed project's calculated trip generation of 284 average daily trips is generally comparable to this prior use.

GP DEIR Impact 3.13-5 evaluated the potential for GP buildout to substantially increase hazards due to a geometric design feature and concluded that, with implementation of GP Circulation Element policies addressing roadway design standards, sight distance, and access management, this impact would be less than significant. With respect to transportation impacts more broadly, the GP DEIR evaluated roadway operations using level of service (LOS), consistent with the methodology in use at the time. Since the City's implementation of Senate Bill 743 in 2024, vehicle miles traveled (VMT) has replaced LOS as the metric for determining transportation significance under CEQA, consistent with CEQA Guidelines Section 15064.3, which states that a project's effect on automobile delay does not by itself constitute a significant environmental impact. This change does not create a new environmental impact; it establishes a new metric for evaluating an impact the DGP DEIR already addressed. Under CEQA Guidelines Section 15183, the relevant question is whether the project would result in impacts peculiar to the project or site, or more severe than those anticipated in the prior EIR. Because the project is consistent with the site's General Plan land use designation, the VMT generated by the project would be the same as the VMT that would have been expected from development of the site under the General Plan, had that metric been applied at the time. Accordingly, there is no difference between the transportation impacts anticipated under the General Plan and those of the project, and no further VMT analysis is required. The Circulation Element's LOS language continues to apply to General Plan consistency but does not govern the CEQA significance determination.

c) The proposed project would access Valentine Avenue via a single driveway located at the same point as the existing driveway serving the former church use. W-Trans evaluated intersection sight distance at the proposed driveway in accordance with Caltrans Highway Design Manual (HDM) criteria. Although the posted speed limit on Valentine Avenue is 25 mph, a field speed survey found average operating speeds of approximately 30 mph; applying the HDM's corner sight distance criteria for that observed speed, the minimum recommended sight distances are 330 feet for left-turn departures and 290 feet for right-turn departures. W-Trans found approximately 400 feet of available sight distance to the east, where the Valentine Avenue/Pleasant Hill Avenue intersection is clearly visible, and approximately 500 feet to the west, beyond a horizontal curve that deflects away from the driver's line of sight — both of which exceed the applicable minimums.

W-Trans also reviewed five years (2020–2024) of collision records from the California Highway Patrol's Statewide Integrated Traffic Records System (SWITRS) for Valentine Avenue in the project vicinity. Only two collisions were recorded during this period, neither at or near the project driveway; both were attributable to driver error (an unlawful lane crossing and an impaired-driving collision) rather than roadway geometry or traffic control deficiencies. W-Trans further evaluated the need for a left-turn lane on Valentine Avenue at the project driveway using NCHRP Report 279 and WSDOT methodologies and found that existing and projected traffic volumes are substantially below the volumes that would warrant a left-turn lane.

Based on this analysis, the proposed project's single driveway would not introduce a sharp curve, dangerous intersection, or other hazardous geometric design feature, and would not result in incompatible uses. This impact would be less than significant.

d) GP DEIR Impact 3.13-6 evaluated emergency access impacts associated with GP buildout and concluded that, with implementation of GP Circulation and Safety Element policies requiring adequate emergency vehicle access as part of project-level review, this impact would be less than significant.

The proposed project's primary emergency access would be provided via the same Valentine Avenue

driveway serving day-to-day traffic, leading to an approximately 545-foot-long, 26-foot-wide internal drive aisle serving all units. W-Trans reviewed the project's fire truck maneuverability exhibit and found that the 26-foot drive aisle width would accommodate emergency ingress and egress, including navigation of the drive aisle's bend.

The project also proposes a 12-foot-wide drivable landscaped surface intended to serve as a secondary emergency vehicle access (EVA) connecting the terminus of the internal drive aisle to Valentine Avenue, to be maintained clear of obstructions by the homeowners' association. Because the internal drive aisle is a dead-end roadway exceeding 300 feet in length, Section 1273.05 of Title 14 of the California Code of Regulations (State Minimum Fire Safe Regulations) requires provision of a turnaround, and the project's tentative map includes a hammerhead-type turnaround at the drive aisle terminus for this purpose. Based on preliminary input from Gold Ridge Fire, W-Trans found that the proposed 12-foot EVA width would not be adequate to accommodate passage by fire apparatus, and recommended that the site plan be revised to either extend the drive aisle back to Valentine Avenue as a loop or widen the secondary EVA to at least 24 feet. However, as conditioned by Goldridge Fire Department the inclusion of gates or other barricades that are approved by the Fire Department will satisfy the safety concerns of emergency access down this route. Since the conclusion of this study, Goldridge Fire has confirmed that the proposed hammerhead turn around provides adequate fire truck maneuverability.

To ensure adequate emergency access, staff recommends the following be incorporated as conditions of approval, consistent with W-Trans's recommendations: (1) curbs on both sides of the drive aisle and turnaround shall be painted red in areas without designated parking; (2) prior to issuance of a grading or building permit, Gold Ridge Fire shall confirm in writing the adequacy of the hammerhead turnaround for department apparatus, or the site plan shall be revised to provide a looped drive aisle or a secondary EVA at least 24 feet in width; (3) removable bollards or other barriers shall be installed at both ends of the secondary emergency egress path for residents to prevent non-emergency use; and (4) project CC&Rs shall obligate the HOA to maintain the secondary emergency egress path for residents clear of obstructions at all times, subject to enforcement by the City. Since this report was provided to staff, the Gold Ridge Fire Department has conditioned the project to include the red curbing, has confirmed that the hammerhead turnaround is adequate for proper turnaround, included the requirement for gates or other approved barricades be approved and installed with Gold Ridge Fires approval, and finally included the condition of the HOA being the responsible agency for ensuring the emergency egress path for residents is clear and maintained at all times.

With incorporation of these conditions, and consistent with the GP FEIR's finding that project-level compliance with emergency access design standards reduces this impact to a less-than-significant level, the proposed project's emergency access impact would be less than significant with mitigation incorporated.

Conclusion

As discussed above, the proposed project's transportation impacts related to consistency with adopted circulation plans and policies (a) and hazards due to geometric design features (c) would be less than significant and were not identified as peculiar to this project or site beyond what was analyzed in the GP FEIR. With respect to CEQA Guidelines Section 15064.3(b) (b), the adoption of VMT as the transportation significance metric does not constitute a new environmental impact but rather a new metric for evaluating an impact already addressed in the GP FEIR. Because the project is consistent with the site's General Plan land use designation, the VMT generated by the project would not exceed the VMT that would have been expected from development of the site under the General Plan. As such, there is no difference between the transportation impacts anticipated in the GP FEIR and those of the project, and this impact would be less than significant. With respect to emergency access (d), Gold Ridge Fire has reviewed the proposed site plan and as conditioned, confirmed that the hammerhead turnaround is adequate for emergency vehicle access and that a looped drive aisle is not required. Therefore, this impact would be less than significant. No potentially significant off-site or cumulative transportation impacts were identified beyond those discussed in the GP

FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified

References

City of Sebastopol, 2016. Draft Environmental Impact Report for the 2016 Sebastopol General Plan Update, SCH# 2016032001, May 2016.

City of Sebastopol, 2023. 2022 Annual Level of Service Report (LOS Report), December 19, 2023.

W-Trans, 2026. Draft Focused Transportation Impact Study for 8100 Valentine Avenue Development, July 21, 2026.

18. Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GP FEIR*	*Off-Site or Cumulative Impact not Identified by GP FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR*
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources. Code Section 5020.1(k), or	No	No	No	No
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	No	No	No	No

Discussion

Tribal cultural resources are defined under Public Resources Code (PRC) Section 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are: (1) listed or determined to be eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources as defined in PRC Section 5020.1(k); or (2) determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Background research was conducted through the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS). No known archaeological resources that could be considered tribal cultural resources listed or determined eligible for listing in the CRHR, or included in a local register of historical resources pursuant to PRC Section 21074(a)(1), would be impacted by the proposed project.

As part of the General Plan Update process, on May 7, 2024, the Native American Heritage Commission (NAHC) was contacted to request a search of the Sacred Lands File and a list of California Native American tribes in the vicinity of the Sebastopol Planning Area. The NAHC responded on May 13, 2024, that no Sacred Lands are on file in the immediate vicinity. Tribal consultation pursuant to Government Code Section 65352.3 (SB 18) and Public Resources Code Section 21080.3.1 (AB 52) was conducted as part of the General Plan process, consistent with City of Sebastopol procedures; this consultation was conducted at the General Plan level and was not performed specifically for the proposed project, nor is project-specific SB 18/AB 52 consultation required at this CEQA Section 15183 consistency-review stage. Tribes consulted during the General Plan process, including the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria of Pomo

Indians, Lytton Rancheria of California, Stewarts Point Rancheria, The Federated Indians of Graton Rancheria, and Ya-Ka-Ama, did not have concerns regarding the Sebastopol planning area. In addition to this General Plan-level consultation, the City initiated a project-specific Cultural Resources records search with the Northwest Information Center (NWIC) of the CHRIS on July 14, 2026 (NWIC File #26-0071), which was returned to City staff on July 20, 2026, as discussed in the Cultural Resources section above. The NWIC search did not identify any recorded tribal cultural resources at or near the project site, but recommended that the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values, and noted that a complete tribal contact list for the project vicinity is available through the NAHC (916/373-3710). Consistent with this recommendation and GP Policy COS-10-1, the City will contact the NAHC and any culturally affiliated tribe(s) prior to project approval to solicit input regarding potential tribal cultural resource concerns specific to the project site. No tribal cultural resources have been identified at or near the project site to date. Based on the above, the City did not identify any tribal cultural resources listed or eligible for listing in the CRHR, nor determine any resources to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. There would be no impact under these significance criteria. Standard project Conditions of Approval require all site work to stop immediately if potential tribal cultural resources, Native American cultural materials, or human remains are discovered during ground-disturbing activities, and that work not resume in the vicinity of the discovery until a qualified archaeologist, in consultation with any culturally affiliated California Native American tribe, has evaluated the find and appropriate treatment measures consistent with Action COS-10c, Public Resources Code Section 5097.94, and California Health and Safety Code Section 7050.5 have been identified.

As discussed above under question (a)(i), background research and a Sacred Lands File search have, and the project-specific NWIC Cultural Resources records search completed July 20, 2026 (NWIC File #26-0071), not identified any tribal cultural resources at or near the project site that have been determined to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. There would be no impact under this significance criterion.

Conclusion

No tribal cultural resource impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

19. Utilities and Service Systems

UTILITIES AND SERVICE SYSTEMS — Would the project	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GP FEIR***	***Off-Site or Cumulative Impact not Identified by GP FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR***
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	No	No	No	No
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	No	No	No	No
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	No	No	No	No
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	No	No	No	No
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	No	No	No	No

Discussion

a) GP DEIR Impacts 3.14-2 and 3.14-4 found less-than-significant impacts for utility infrastructure buildout, based on adequate capacity, connection requirements, and connection fees. The project, as conditioned, will connect to existing municipal water, sewer, and storm drain infrastructure along Valentine Avenue with no off-site improvements needed: a new looped water main serves 20 metered services, a new on-site sewer main connects to the existing eastern property line sewer line, and two bioretention basins treat stormwater before discharge to the existing storm drain, reducing impervious surface from ~85,000 to ~66,000 square feet. Electrical and telecommunications will use existing frontage infrastructure and the 25-foot eastern utility easement. No new or expanded utility facilities that could cause significant environmental effects are required; this impact would be less than significant.

The applicant provided water and sewer capacity studies for the 39 units were confirmed sufficient, and City staff independently verified this against cumulative system modeling to ensure the project, as conditioned, would not overburden City infrastructure.

b) GP DEIR Impact 3.14-1 evaluated water supply adequacy and concluded that existing supplies are adequate to meet demand generated by GP buildout. As discussed in the 2022 LOS Report, Sebastopol is dependent on municipal wells for potable water supply. Total annual water production was 286 million gallons in 2022. Annual water demand for the proposed 39-home project is estimated at approximately 3.26 million gallons per year, accounting for domestic use and common area landscape irrigation (which is expected to decline after plant establishment). This represents approximately 1.1 percent of 2022 annual production. The estimated water demand for the proposed

project is also within the 10.6 million gallons per year of additional demand from projects pending approval identified in the LOS Report. Based on actual production, historic production capability, and estimated annual water demand, sufficient water supplies would be available to serve the proposed project during normal, dry, and multiple dry years.

c) As discussed under item (a) above, Sebastopol maintains a sanitary sewer collection system and pumping stations that transfer wastewater from Sebastopol to the Sub-regional Water Reclamation System Treatment Plant operated by the City of Santa Rosa on Llano Road. As a partner in the Sub-regional system, Sebastopol has an entitlement to treatment capacity of 0.84 million gallons per day (mgd). Average dry weather sewer flow in 2022 was 0.393 mgd, or approximately 47 percent of treatment entitlement. Accounting for this flow, a reserve factor, and approved and pending projects, there is an estimated 0.374 mgd of unused treatment capacity, which according to the LOS Report equates to 45 percent of total capacity and would support the development of approximately 2,415 single-family homes. The proposed 39-home project represents a small fraction of this available capacity. There would be adequate wastewater treatment capacity to serve the proposed project.

d) GP DEIR Impact 3.14-5 evaluated solid waste generation associated with GP buildout and found that cumulative growth under GP buildout would result in an increase in solid waste generation well within the permitted capacity of the Central Disposal Site serving the City, and that this impact would be less than significant. The proposed project would generate solid waste typical of a 39-home residential development. Centralized trash, composting, and recycling enclosures would serve all residents under a single HOA-managed service contract. The project, as conditioned, is consistent with the GP land use designation for the project site, and solid waste generation associated with the project was evaluated in the GP FEIR and determined to result in a less than significant impact. The project will be conditioned to provide a WMP for the approval of the Planning Director and Waste Management Agency prior to recordation of Final Map.

e) As discussed under question (d) above, the proposed project is consistent with the GP land use designation for the project site, and would be conditioned to provide a WMP demonstrating compliance with all applicable federal, state, and local management and reduction statutes and regulations related to solid waste, including compliance with CalRecycle's waste diversion requirements. This impact would be less than significant and would not be peculiar to the project.

Conclusion

As discussed above, no utilities or service system impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.

20. Wildfire

	WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GP FEIR***	***Off-Site or Cumulative Impact not Identified by GP FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GP FEIR***
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?	No	No	No	No
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No	No	No	No
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No	No	No	No
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No	No	No	No

Discussion

Impacts related to the potential for implementation of the GP to expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires were evaluated under Impact 3.8-6 on pages 3.8-26 to 3.8-29 of the GP DEIR. The analysis determined that there are no Fire Hazard Severity Zones (FHSZs) within State Responsibility Areas (SRAs) or Very High Fire Hazard Severity Zones (VHFHSZs) within any Local Responsibility Areas (LRAs) in the City of Sebastopol. The nearest moderate and high FHSZs are located approximately three miles to the west of the City. The analysis concluded that implementation of the GP would have a less than significant impact with regard to wildland fire risk. The project site (the 8100 Valentine Avenue residential site) is an urban infill area and is not located in or near SRAs or lands classified as VHFHSZ. An updated query of the CAL FIRE Fire Hazard Severity Zone Viewer confirms that there are no FHSZs within SRAs or VHFHSZs within LRAs within or near the City of Sebastopol. The project site is not in an area where slope, prevailing winds, or other factors would exacerbate wildfire risk, and the project does not require installation of roads, fuel breaks, emergency water sources, or utility infrastructure that could exacerbate fire risk. The site is not subject to significant risks from post-fire slope instability, flooding, or drainage changes. Construction and operation of the proposed project would adhere to all applicable state and local regulations, codes, and policies addressing fire safety. Impacts related to wildfire would be less than significant.

Conclusion

No wildfire impacts peculiar to this project or site were identified that were not analyzed in the GP FEIR. No potentially significant off-site or cumulative impacts were identified beyond those discussed in the GP FEIR, and no substantial new information has emerged that would indicate more severe impacts than previously identified.