

**EXHIBIT “A”
GOWG RECOMMENDATIONS
FOR AGRICULTURAL GRADING**

All agricultural grading would be subject to the requirements and thresholds provided below.

REQUIREMENTS	THRESHOLDS	CONFORMS	PROPOSED ORDINANCE
<p style="text-align: center;"><u>Exempt Grading</u></p> <p>R1. No grading permit would be required.</p> <p>R2. No grading plan would be required.</p> <p>R3. A drainage permit and engineered drainage plan would be required if the grading involves any drainage work subject to Chapter 11 of the Sonoma County Code.</p> <p>R4. No inspections would be required, except where a drainage permit is required.</p> <p>R5. No notice to interested state and federal regulatory agencies would be required.</p> <p>R6. Compliance with county agricultural grading, erosion and sediment control, and drainage standards would be required.</p>	<p style="text-align: center;"><u>Exempt Grading</u></p> <p>T1. Grading that meets <u>all</u> of the following criteria, provided the grading does not qualify as prohibited grading:</p> <p>(a) . Excavation and fill do not exceed 500 cubic yards per acre.</p> <p>(b). Excavation is less than 2 feet in depth or creates a cut slope no greater than 5 feet in height and no steeper than 50%.</p> <p>(c). Fill is less than 1 foot in depth on terrain with a natural slope of less than 20% or less than 3 feet in depth and not intended to support structures.</p> <p>(d). No imported fill is placed in the Santa Rosa Plain flood-prone area or any 100-year flood hazard area mapped by Federal Emergency Management Agency.</p>	<p>R1. Yes</p> <p>R2. Yes</p> <p>R3. Yes</p> <p>R4. Yes</p> <p>R5. Yes</p> <p>R6. Yes</p> <p>T1(a): No</p> <p>T1(b): Yes</p> <p>T1(c): No</p> <p>T1(d): Yes</p>	<p>R1. §11.02.040.A and §11.04.020.</p> <p>R2. §11.02.040.A, §11.04.010 and §11.04.020</p> <p>R3. §11.06.010.A and Table 11-2.</p> <p>R4. §11.02.040.A.</p> <p>R5. There is no express notice requirement in the proposed ordinance.</p> <p>R6. §11.02.040.A and §11.04.020.</p> <p>T1(a)(1): This exemption remains at the current 50 cubic yard threshold, which was staff’s original recommendation. §11.04.020.H and §11.04.020.I.</p> <p>T1 (a)(2): §11.04.020.H.</p> <p>T1 (a)(3): The percent of natural slope was changed from 20% to 15% to be consistent with Vineyard and Orchard Site Development provisions. See §11.04.020.I and Table 34-3 (there is a typographical error in the table numbering. It should read Table 11-3).</p> <p>T1 (a)(4): §11.04.010.A, Table 11-1 and §11.04.020.I</p>
<p style="text-align: center;"><u>Class I Grading</u></p> <p>R7. A ministerial grading permit would be required.</p>	<p style="text-align: center;"><u>Class I Grading</u></p> <p>T2: Grading that meets <u>all</u> of the following criteria,</p>		<p>The nomenclature was changed to be regular grading and engineered grading. This change was needed to be consistent with CBC language.</p>

<p>R8. A non-engineered grading plan with erosion and sediment control and drainage information would be required.</p> <p>R9. Inspections by the agricultural commissioner would be required.</p> <p>R10. Notice to interested state and federal regulatory agencies would be required.</p> <p>R11. Compliance with county agricultural grading, erosion and sediment control, and drainage standards would be required.</p>	<p>provided the grading does not qualify as exempt grading:</p> <p>(a). Excavation and fill do not exceed 1,500 cubic yards per acre.</p> <p>(b). Excavation is less than 2 feet in depth or creates a cut slope no greater than 5 feet in height and no steeper than 50%.</p> <p>(c). Fill is less than 2 feet in depth with a constructed slope no steeper than 50%.</p> <p>(d).. No imported fill is placed in the Santa Rosa Plain flood-prone area or any 100-year flood hazard area mapped by the Federal Emergency Management Agency.</p> <p>(e). The disturbed area has a natural slope of less than 15%.</p> <p>(f). The grading does not involve any drainage work subject to Chapter 11 of the Sonoma County Code.</p> <p>(g). The disturbed area is not in the Geologic Hazard Area Combining District and does not contain any geologic hazards.</p>	<p>R7. Yes</p> <p>R8. Yes</p> <p>R9. Yes</p> <p>R10. No (qualified)</p> <p>R11. Yes</p> <p>T2(a). No</p> <p>T2(b). Yes (qualified)</p> <p>T2(c). No</p> <p>T2(d). Yes</p> <p>T2(e). Yes</p> <p>T2(f). No</p> <p>T2(g). Yes</p>	<p>Table 11-1 presents the thresholds for regular and engineered grading.</p> <p>R7. §11.10.020.E, §11.04.010 and Table 11-1.</p> <p>R8. §11.04.010, Table 11-1 and §11.10.020.B.</p> <p>R9. §11.14.030.C, §11.10.010 and Table 11-4.</p> <p>R10. There is no express notice requirement in the proposed ordinance, but staff would provide notice during the permit application review process where a state or federal permit or approval may be required.</p> <p>R11. §11.02.040.A.</p> <p>T2(a). The volumetric threshold remains at 5000 cubic yard to be consistent with the CBC definition of engineered grading.</p> <p>T2(b). The slope threshold was eliminated from Table 11-1 because §11.16.010.B.1 and §11.16.010.C.7 requires slopes to be no steeper than 50%, unless a soils report justifies a steeper slope.</p> <p>T2(c). The depth was increased to 3 feet to be consistent with the compaction standard of § 11.16.010.C.6. Also, the slope threshold has been removed as described above.</p> <p>T2(d). Table 11-1, §11.16.010.C.8 and §11.16.010.C.9.</p> <p>T2(e). Table 11-1.</p> <p>T2(f). Drainage improvements are not a threshold for grading designation. §11.06.010 establishes the thresholds for drainage designation (regular and engineered).</p> <p>T2(g). Table 11-1.</p>
<p><u>Class II Grading</u></p>	<p><u>Class II Grading</u></p>		<p>The nomenclature was changed to be regular grading and engineered grading. This change was</p>

<p>R12. A ministerial grading permit would be required.</p> <p>R13. An engineered grading plan with erosion and sediment control and drainage information would be required.</p> <p>R14. A soils engineering report and engineering geology report would be required if the disturbed area has a natural slope of 30% or greater.</p> <p>R15. All fills would be required to be compacted to the density specified by the civil engineer of record or a soils engineer.</p> <p>R16. Inspections by the agricultural commissioner and the civil engineer of record would be required.</p> <p>R17. A statement by the civil engineer of record that the work was done in accordance with the final approved grading plan would be required.</p> <p>R18. Notice to interested state and federal regulatory agencies would be required.</p> <p>R19. Compliance with county agricultural grading, erosion and sediment control, and drainage standards would be required.</p>	<p>T3: Grading that meets <u>any</u> of the following criteria, provided the grading does not qualify as exempt grading or prohibited grading:</p> <p>a. Excavation and fill exceed 1,500 cubic yards per acre.</p> <p>b. Excavation is 2 feet or greater in depth or creates a cut slope greater than 5 feet in height or steeper than 50%.</p> <p>c. Fill is 2 feet or greater in depth or has a constructed slope steeper than 50%.</p> <p>d. Imported fill is placed in the Santa Rosa Plain flood-prone area or any 100-year flood hazard area mapped by the Federal Emergency Management Agency.</p> <p>e. The disturbed area has a natural slope of 15% or greater.</p> <p>f. The grading involves drainage work subject to Chapter 11 of the Sonoma County Code.</p> <p>g. The disturbed area is in the Geologic Hazard Area Combining District or contains geologic hazards or both.</p>	<p>R12. Yes</p> <p>R13. Yes</p> <p>R14. Yes (qualified)</p> <p>R15. Yes (qualified)</p> <p>R16. Yes</p> <p>R17. Yes</p> <p>R18. No (qualified)</p> <p>R19. Yes</p> <p>T3(a). No</p> <p>T3(b). Yes (qualified)</p> <p>T3(c). No</p>	<p>needed to be consistent with CBC language. Table 11-1 presents the thresholds for regular and engineered grading.</p> <p>R12. §11.10.020.E, §11.04.010 and Table 11-1.</p> <p>R13. §11.04.010, Table 11-1 and §11.10.020.B.</p> <p>R14. All engineered grading permits would require a soil engineering report and engineering geology report as part of the application. However, the slope threshold for engineered grading is 15%.</p> <p>R15. All fills intended to support structures or surcharges are required to be compacted to 90% of maximum density. The compaction level for fills not intended to support structure or surcharges is to be specified by a soils engineer. §11.16.010.C.6.</p> <p>R16. §11.14.030.C.</p> <p>R17. §11.14.030.C.3.</p> <p>R18. There is no express notice requirement in the proposed ordinance, but staff would provide notice during the permit application review process where a state or federal permit or approval may be required.</p> <p>R19. §11.02.040.A.</p> <p>T3(a). The volumetric threshold remains at 5000 cubic yard to be consistent with the CBC definition of engineered grading.</p> <p>T3(b). The slope threshold was eliminated from Table 11-1 because §11.16.010.B.1 and §11.16.010.C.7 requires slopes to be no steeper than 50%, unless a soils report justifies a steeper slope.</p> <p>T3(c). The depth was increased to 3 feet to be consistent with the compaction standard of §</p>
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		T3(d). Yes T3(e). Yes T3(f). No T3(g). Yes	11.16.010.C.6. Also, the slope threshold has been removed as described above. T3(d). Table 11-1, §11.16.010.C.8 and §11.16.010.C.9. T3(e). Table 11-1. T3(f). Drainage improvements are not a threshold for grading designation. §11.06.010 establishes the thresholds for drainage designation (regular and engineered). T3(g). Table 11-1.
<u>Prohibited Grading</u>	<u>Prohibited Grading</u>		
	T4. Agricultural grading on a disturbed area that has a natural slope of greater than 50%, except grading to replant an agricultural crop within the footprint of the existing planting area.	T4: Yes	T4: This requirement was inadvertently omitted from §11.16.090 of the public review draft, but will be included in the proposed ordinance when it is introduced.
<u>Exceptions to County Standards</u>	<u>Exceptions to County Standards</u>		
R20. A discretionary grading permit would be required. R21. A non-engineered or engineered grading plan, as determined appropriate by the agricultural commissioner, with erosion and sediment control and drainage information would be required. R22. Inspections by the agricultural commissioner and, if applicable, the civil engineer of record would be required. R23. If applicable, a statement by the civil engineer of record that the work was done in accordance with the final approved grading plan would be required. R24. Referrals to interested state and federal regulatory agencies pursuant to the California Environmental Quality Act would be required.	T5. Exceptions to county agricultural grading, erosion and sediment control, and drainage standards could be granted where special circumstances affecting the property made the strict application of county standards impractical and where the applicant demonstrated, based on appropriate documentation, that the adjustment proposed by the applicant would provide the same overall level of environmental protection as the established standards. Exceptions would be subject to such conditions as would assure that the adjustment authorized by the exception would not constitute a grant of special privileges inconsistent with the limitations imposed by county standards on other property in the county.	R20. Yes R21. Yes R22. Yes R23. Yes R24. Yes R25. Yes T5. Yes	R20. §11.10.020.D, §11.10.020.E, §11.10.050, §11.12.010.A.2, §11.12.010.B. R21. §11.02.040.A and §11.10.050. R22. §11.14.030.C. R23. §11.14.030.C.3. R24. §11.10.050. R25. §11.02.040.A. T5. §11.10.020.D, §11.10.020.E, §11.10.050, §11.12.010.A.2, §11.12.010.B.

R25. Compliance with county agricultural grading, erosion and sediment control, and drainage standards, as modified by the discretionary grading permit, would be required.			
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All agricultural grading would be subject to the following standards:

- (a) Agricultural grading shall not alter any stream, except as permitted by an approved California Department of Fish and Game Streambed Alteration Agreement.

Ordinance: Yes. In general grading and drainage permits are ministerial and do not require coordination with other agencies. However, any work in a stream that may roil (cloud) the waters is subject to the Sonoma County Code, Chapter 23, Article II – Water Clarity (“Chapter 23, Article II”). Chapter 23, Article II requires a streambed alteration agreement prior to issuance of a roiling permit. Through department policy, PRMD does not issue grading or drainage permits that need a roiling permit until the roiling permit is obtained. This recommendation is being implemented, though not directly through the proposed ordinance. §11.16.100 requires compliance with Chapter 23, Article II.

- (b) Agricultural grading shall not occur within any wetlands mapped in the General Plan and/or Zoning Ordinance.

Ordinance: Yes. See §11.16.130 and §11.24.020 for the definition of “Designated Wetland.”

- (c) Agricultural grading shall not occur within any agricultural riparian setbacks established in the General Plan and/or Zoning Ordinance.

Ordinance: Yes. See §11.16.110, Table 11-5 and §11.24.020 for the definition of “Designated Stream.”