FIRSTCARBONSOLUTIONS™

DRAFT
Cotati Hotel and Market Hall Project
Initial Study/Mitigated Negative Declaration
City of Cotati, Sonoma County, California

Prepared for:
City of Cotati
Community Development Department
201 West Sierra Avenue
Cotati, CA 94931
707.665.3637

Contact: Jon-Paul Harries, Senior Planner

Prepared by:
FirstCarbon Solutions
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597
925.357.2562

Contact: Jason Brandman, Project Director
Grant Gruber, Project Manager

Report Date: April 5, 2019

THIS PAGE INTENTIONALLY LEFT BLANK

Table of Contents

Section 1: Introduction 1
1.1 - Purpose 1
1.2 - Project Location 1
1.3 - Environmental Setting 1
1.4 - General Plan Designation and Zoning 2
1.5 - Project Description 2
1.6 - Required Discretionary Approvals 15

Section 2: Environmental Checklist and Environmental Evaluation 17
1. Aesthetics 18
2. Agriculture and Forestry Resources 21
3. Air Quality 23
4. Biological Resources 43
5. Cultural and Tribal Cultural Resources 48
6. Energy 54
7. Geology and Soils 56
8. Greenhouse Gas Emissions 62
9. Hazards and Hazardous Materials 73
10. Hydrology and Water Quality 78
11. Land Use and Planning 82
12. Mineral Resources 87
13. Noise 89
14. Population and Housing 97
15. Public Services 98
16. Recreation 100
17. Transportation 101
18. Utilities and Service Systems 108
19. Wildfire 111
20. Mandatory Findings of Significance 113

Section 3: References 115

Section 4: List of Preparers 117

Appendix A: Air Quality/Greenhouse Gas Emissions Supporting Information
A.1 - Additional Rooms AQ/GHG Memo
A.2 - Project Construction Assumptions, CalEEMod Output, Construction Health Risk Assessment Calculations, and AERMOD Modeling Output

Appendix B: Biological Resources Supporting Information

Appendix C: Cultural Resources Supporting Information

Appendix D: Geotechnical Investigation

Appendix E: Noise Supporting Information
E.1 - Additional Rooms Noise Memo
E.2 - Noise Data

Appendix F: Transportation Supporting Information
F.1 - Additional Rooms Transportation Impacts Memo
F.2 - Shared Parking Analysis for Proposed Cotati Hotel with 153 Rooms
F.3 - Transportation Impact Analysis

Appendix G: Hotel Sewer Capacity Analysis Memo

List of Tables

Table 1: Project Consistency with Applicable Clean Air Plan Control Measures....25
Table 2: Annual Construction Emissions (Unmitigated)....29
Table 3: Construction Emissions (Unmitigated Average Daily Rate)....30
Table 4: Daily Operational Emissions (Unmitigated)....31
Table 5: Annual Operational Emissions (Unmitigated)....31
Table 6: Project DPM Construction Emissions—No Mitigation....33
Table 7: Exposure Assumptions for Cancer Risk....34
Table 8: Estimated Health Risks and Hazards—Project Construction....35
Table 9: Estimated Health Risks and Hazards During Construction—Tier III Mitigation....36
Table 10: Summary of the Cumulative Health Impacts at the MIR during Construction....38
Table 11: Odor Screening Distances....40
Table 12: Project Energy Consumption Estimates....54
Table 13: Construction Greenhouse Gas Emissions....63
Table 14: Unmitigated Operational Greenhouse Gas Emissions (2020)....64
Table 15: Mitigated Operational Greenhouse Gas Emissions (2020)....65
Table 16: Project Compliance with Cotati-Selected GHG Measures....66
Table 17: Traffic Noise Model Results Summary....84
Table 18: Project Trip Generation....101
Table 19: Existing Plus Project Conditions Traffic....102
Table 20: Cumulative Plus Project Conditions Traffic....105

List of Exhibits

Exhibit 1: Regional Location Map....5
Exhibit 2: Local Vicinity Map, Aerial Base....7
Exhibit 3: Site Plan....9
Exhibit 4a: Hotel Elevations....11
Exhibit 4b: Market Hall and Water Tank Elevations....13

ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
AB	Assembly Bill
ADWF	Average Dry Weather Flow
AFY	acre-feet a year
Air Basin	San Francisco Bay Area Air Basin
APN	Assessor Parcel Numbers
AQP	Air Quality Plan
ARB	California Air Resources Board
ASF	age sensitivity factor
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CALUP	Comprehensive Airport Land Use Plan
CAP	Clean Air Plan
CAPCOA	California Air Pollution Control Officers Association
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNEL	community noise equivalent level
CO_2e	carbon dioxide equivalent
CRPUSD	Cotati-Rohnert Park Unified School District
d/C	demand-to capacity
dBA	A-weighted decibel
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substance Control
EDD	California Department of Employment Development
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
EV	electric vehicle

FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIGR	Federated Indians of Graton Rancheria
FIRM	Flood Insurance Rate Map
FY	Fiscal Year
GHG	greenhouse gas
gpd	gallons per day per acre
HI	hazard index
HRA	Health Risk Assessment
IS/MND	Initial Study/Mitigated Negative Declaration
kWh	kilowatt hour
L_{dn}	day/night average sound level
LED	light-emitting diode
LID	Low Impact Development
L_{max}	maximum noise/sound level
LOS	Level of Service
LUST	Leaking Underground Storage Tank
LWWTP	Laguna Wastewater Treatment Plant
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MLD	most likely descendant
MM	Mitigation Measure
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer Systems
NG	Northern Gateway (specific plan designation)
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
OEHHA	California Office of Environmental Health Hazards Assessment
PPV	peak particle velocity
RAFD	Rancho Adobe Fire Protection District
RCPA	Regional Climate Protection Agency
REL	reference exposure level
ROG	Reactive Organic Gas
RWQCB	Regional Water Quality Control Board
SCH	State Clearinghouse
SCP	Sonoma Clean Power
SCTA	Sonoma County Transportation Authority

SCWA	Sonoma County Water Agency
SCWMA	Sonoma County Waste Management Agency
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMARA	Surface Mining and Reclamation Act
SMART	Sonoma-Marin Area Rail Transit
SR	State Route
SRPCS	Santa Rosa Plain Conservation Strategy
State Water Board	State Water Resources Control Board
SWPPP	Storm Water Pollution Prevention Plan
TAC	Toxic Air Contaminants
TAH	time at home factors
TCR	Tribal Cultural Resources
TDM	transportation demand management
TRO	Trip Reduction Ordinance
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled

THIS PAGE INTENTIONALLY LEFT BLANK

SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts from implementation of the Cotati Hotel and Market Hall Project in the City of Cotati, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Cotati is the Lead Agency in the preparation of this IS/MND and any additional environmental documentation required for the project. The City has discretionary authority over the proposed project. The intended use of this document is to determine the level of environmental analysis required to adequately prepare the project IS/MND and to provide the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the project location and the characteristics of the project. Section 2, Environmental Checklist and Environmental Evaluation, includes an environmental checklist giving an overview of the potential impacts that may result from project implementation. Section 3, References, elaborates on the information contained in the environmental checklist, along with justification for the responses provided in the environmental checklist.

1.2 - Project Location

The project site is located in the City of Cotati, Sonoma County, California (Exhibit 1). The 4-acre project site consists of three parcels, Assessor Parcel Numbers (APNs) 144-170-003, -005, and -010. The project site is at the southeastern corner of the U.S. Highway 101 (U.S. 101)/California State Route 116 (SR-116) interchange in central Cotati, northwest of the downtown area (Exhibit 2). The project site is located on the Cotati, California United States Geological Survey 7.5-Minute Topographical Quadrangle, Township 6 North, Range 8 West, Section 26 (Latitude 38° 19’ 49” North; Longitude 122° 42’ 40” West).

1.3 - Environmental Setting

The project site has relatively flat topography and is mostly vacant. It currently contains a park-and-ride surface parking area at its center, and a paved area near the intersection of St. Joseph Way and Old Redwood Highway. This paved area previously supported commercial structures that have been removed. There are no buildings on the project site. Outside of the paved areas, the site is covered mainly with grasses and weeds. Some well-established trees and shrubs are on the project site, with a concentration of trees along the northbound U.S. 101 off-ramp.

The project site is bounded on the west by a U.S. 101 northbound off-ramp, on the north by Gravenstein Highway (SR-116), on the east by Old Redwood Highway, and on the south by St. Joseph Way. Access to the project site is available from St. Joseph Way, a paved public street that extends west from Old Redwood Highway. Sidewalks and streetlights have been installed along the Old Redwood Highway and Gravenstein Highway frontage. Streetlights also have been installed at the

park-and-ride facility. A chain-link fence separates the project site from the U.S. 101 off-ramp and from Gravenstein Highway.

The project vicinity consists mainly of commercial and light industrial development. Commercial development is located across Old Redwood Highway from the project, including a Walgreens store. St. Joseph Catholic Church is located approximately 0.2-mile south of the site, and Oliver's Business Properties (Oliver's Market) owns the property south of St. Joseph Way. This property is mostly vacant, except for a ballfield with stands on St. Joseph Way near the U.S. 101 off-ramp. The ballfield appears to be largely unused.

1.4 - General Plan Designation and Zoning

The General Plan Land Use designation applicable to the project site is SP—Specific Plan. Land uses under this designation are allowed as described by the applicable specific plan, which for this project is the Downtown Specific Plan, adopted in 2009. The Downtown Specific Plan designates the project site as part of the Northern Gateway (NG) district, an area intended for a new mixed-use core, accommodating a wide variety of retail, restaurant, and entertainment uses. In Section 1.10.020 of the Downtown Specific Plan, Program No. 19 encourages hotel development in the NG district. The project site is zoned Specific Plan—Downtown (SPD), which permits uses and intensities consistent with designations in the Downtown Specific Plan.

1.4.1 - Tiering

Because CEQA discourages "repetitive discussions of the same issues" (CEQA Guidelines § 15152(b)) and allows limiting discussion of a later project that is consistent with a prior plan to impacts which were not examined as significant effects in a prior Environmental Impact Report (EIR) or to significant effects which could be reduced by revisions in the later project (CEQA Guidelines § 15152(d)), no additional benefit to the environment or public purpose would be served by preparing an EIR merely to restate the analysis and the significant and unavoidable effects found to remain after adoption of all mitigation measures.

This IS/MND tiers from the Downtown Specific Plan EIR (State Clearinghouse [SCH] No. 2006032072) and General Plan EIR (SCH No. 2013082037). The applicable mitigation identified in the Downtown Specific Plan EIR is carried forward in this IS/MND, and is modified, where needed, to reflect current regulations, standards, and best practices. Applicable mitigation includes actions related to dust control during construction, protection of nesting birds and protected trees, best practices related to stormwater control, site specific studies related to geology, and best practices related to noise during construction and operation.

1.5 - Project Description

1.5.1 - Summary

The project applicant (Cotati Hotel LLC) proposes to remove the existing park-and-ride lot, merge the existing parcel lines, and develop a hotel and Market Hall on the project site. The hotel, approximately 20,050 square feet in size, would provide 153 keys (guest quarters) and associated amenities including a Board Room, Lounge, kitchen, fitness room, VIP Club, pool, and courtyard.

A standalone building, approximately 5,650 square feet in size, would be provided at the corner of Old Redwood Highway and St. Joseph Way. The building would include a 3,596-sqaure-foot Market Hall. The remainder of the building, approximately 2,054 square feet, would include a kitchen, storage, restrooms, staff lounge, and office space.

The project includes a paved parking lot with approximately 167 spaces for vehicles. Approximately 16 parallel parking spaces would be provided along St. Joseph Way. The project includes bike racks to accommodate approximately 24 bicycles. In addition, four covered bicycle spaces will be provided. Right-of-way along St. Joseph Way would be dedicated to the City. Exhibit 3 depicts the site plan.

1.5.2 - Amenities

The hotel amenities would occupy the first floor; the guest rooms would be located on the first, second, third, and fourth floors. Certain amenities such as the Market Hall and Hotel Lounge would be available for the general public, while other such as the VIP Club, pool, and fitness facility would be for hotel guests only. The Market Hall would be a gathering venue for events such as live music, fundraisers, or farmers' markets.

1.5.3 - Access

Access to the project would be from St. Joseph Way, which would be a right-in/right-out roadway only. The intersection of St. Joseph Way and Old Redwood Highway will be restriped to allow northbound left-turns from Old Redwood Highway to St. Joseph Way. Half width improvements would be made to St. Joseph Way along the project frontage consisting of curb, gutter, and sidewalk. An emergency vehicle access is proposed at Gravenstein Highway within the northwestern portion of the project site, which will require an Encroachment Permit from the California Department of Transportation (Caltrans). The emergency vehicle access would be approximately 40 feet in width, with a rolled curb and removable decorative bollards to prevent use by non-emergency vehicles.

A future access road approximately 360 feet south of the project site is proposed off Old Redwood Highway, with a future signalized intersection. This roadway is contemplated by the City of Cotati General Plan. The development of this roadway is independent of the proposed project and would be pursued in conjunction with the development of the properties south of the project site.

1.5.4 - Traffic Improvement

Under existing conditions, left-turns from Old Redwood Highway into the southernmost Walgreens driveway (located approximately 165 feet south of St. Joseph Way) are permitted, although a standard left-turn pocket is not provided. The State vehicle code does not allow U-turns in business districts (which would apply to Old Redwood Highway south of Gravenstein Highway) unless expressly permitted by signage.

Site egress would be improved by restriping a portion of the existing Old Redwood Highway paved section to provide a full left-turn pocket that can accommodate U-turns on Old Redwood Highway at the southernmost Walgreens driveway (see Figure 2d in Appendix F). To allow U-turns, the lane configuration will provide a total of 44 feet (including the width of the travel lane from which the U-

turn would occur), measured from the right edge of the southbound left-turn lane to the curb on the northbound side of Old Redwood Highway. In addition to restriping, a portion of the existing northbound curb on Old Redwood Highway will be relocated, and the edge of the adjacent driveway, to the east by an estimated two to four feet.

1.5.5 - Parking

A parking area with 167 parking spaces would be installed west and north of the hotel building. Sixteen on-street spaces would be provided along the project frontage with St. Joseph Way.

1.5.6 - Pedestrian Facilities

A sidewalk would be constructed along the St. Joseph Way frontage. An urban trail and interpretative exhibit would be constructed around the preserved wetland area.

1.5.7 - Landscaping

Landscaping consisting of native drought-tolerant trees, shrubs, and groundcover is proposed at the perimeter of the project site and within the parking area. Raised planter beds, planter pots, and overhead vines on cables would be provided around the hotel building and within the courtyard. Swales, tree wells, and porous pavers would be provided along St. Joseph Way.

1.5.8 - Appearance

The hotel would stand 53 feet above finished grade at the top of the parapet and extend an additional five feet for the elevator/stair access, to a maximum height of 58 feet. The Market Hall would stand 32 feet above finished grade. A decorative water tower would be located next to the Market Hall and stand up to 45 feet above finished grade. Exhibit 4a provides elevations of the hotel and Exhibit 4b provides elevations of the Market Hall and water tank.

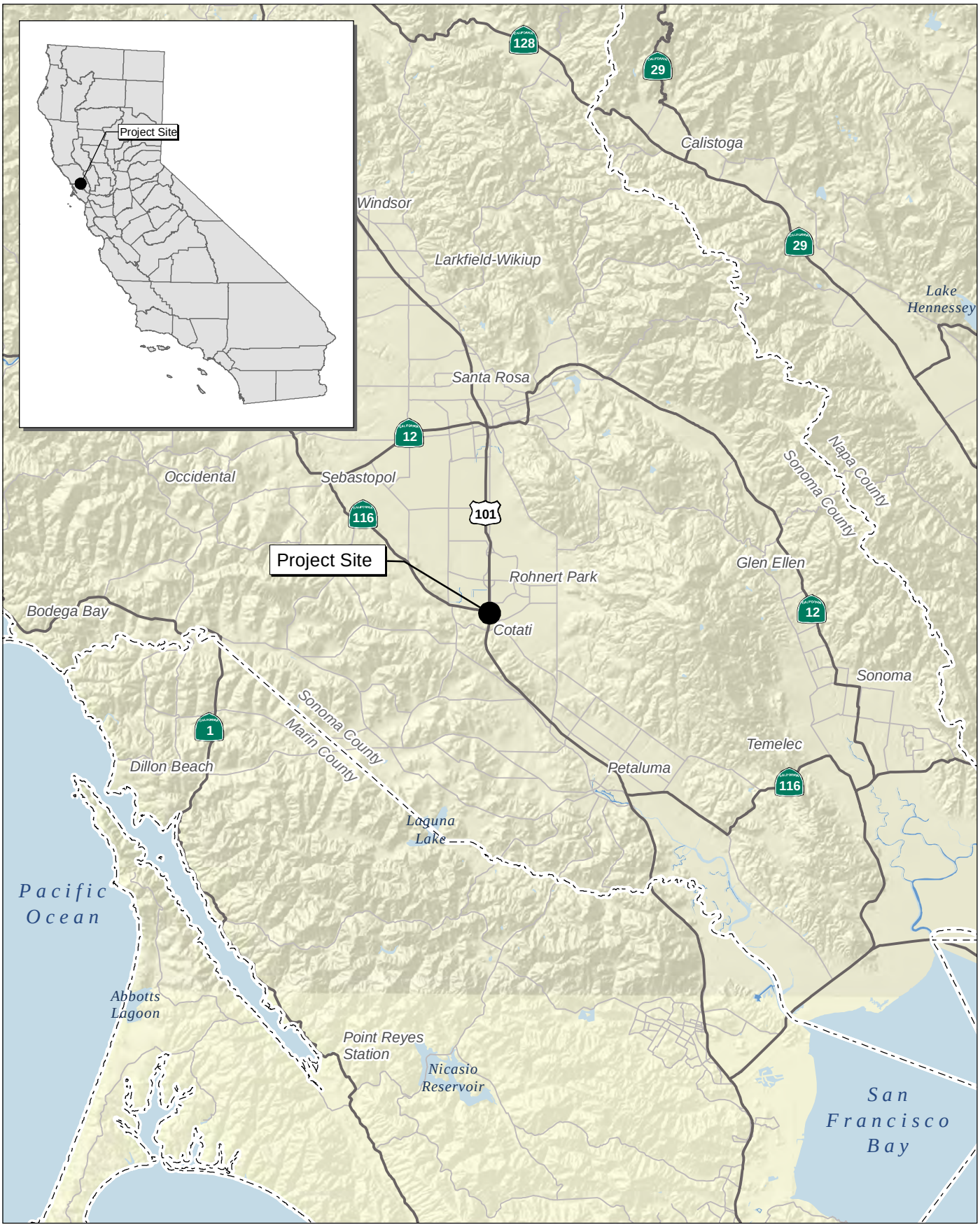
1.5.9 - Utilities

The proposed project would connect to existing City of Cotati municipal utility lines located within St. Joseph Way and Old Redwood Highway.

The proposed project would connect to an existing 6-inch diameter water line within St. Joseph Way. The proposed project would discharge effluent into an existing 8-inch diameter sewer line within St. Joseph Way.

The project would install an on-site storm drainage system consisting of inlets, underground piping, and bioretention basins. Stormwater would be discharged into an existing 18-inch diameter underground storm drainage line along the project frontage with Old Redwood Highway at a rate no greater than the pre-development condition of the project site.

Sonoma Clean Energy would provide electricity to the proposed project, which would be delivered by Pacific Gas and Electric Company (PG&E). PG&E would provide natural gas service to the proposed project. All service connections would be provided via underground laterals.



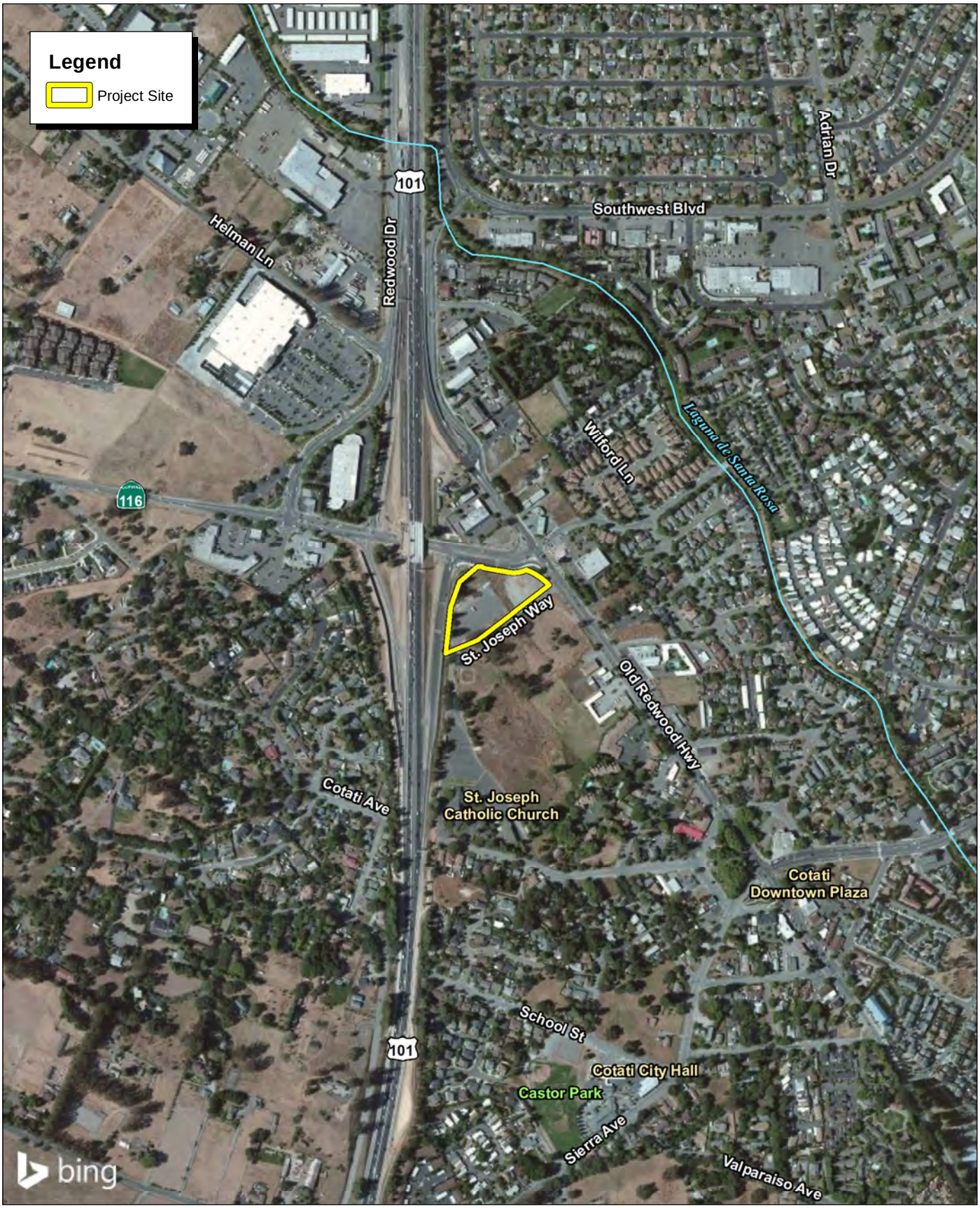
Source: Census 2000 Data, The CaSIL.

FIRSTCARBON SOLUTIONS™

5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

THIS PAGE INTENTIONALLY LEFT BLANK



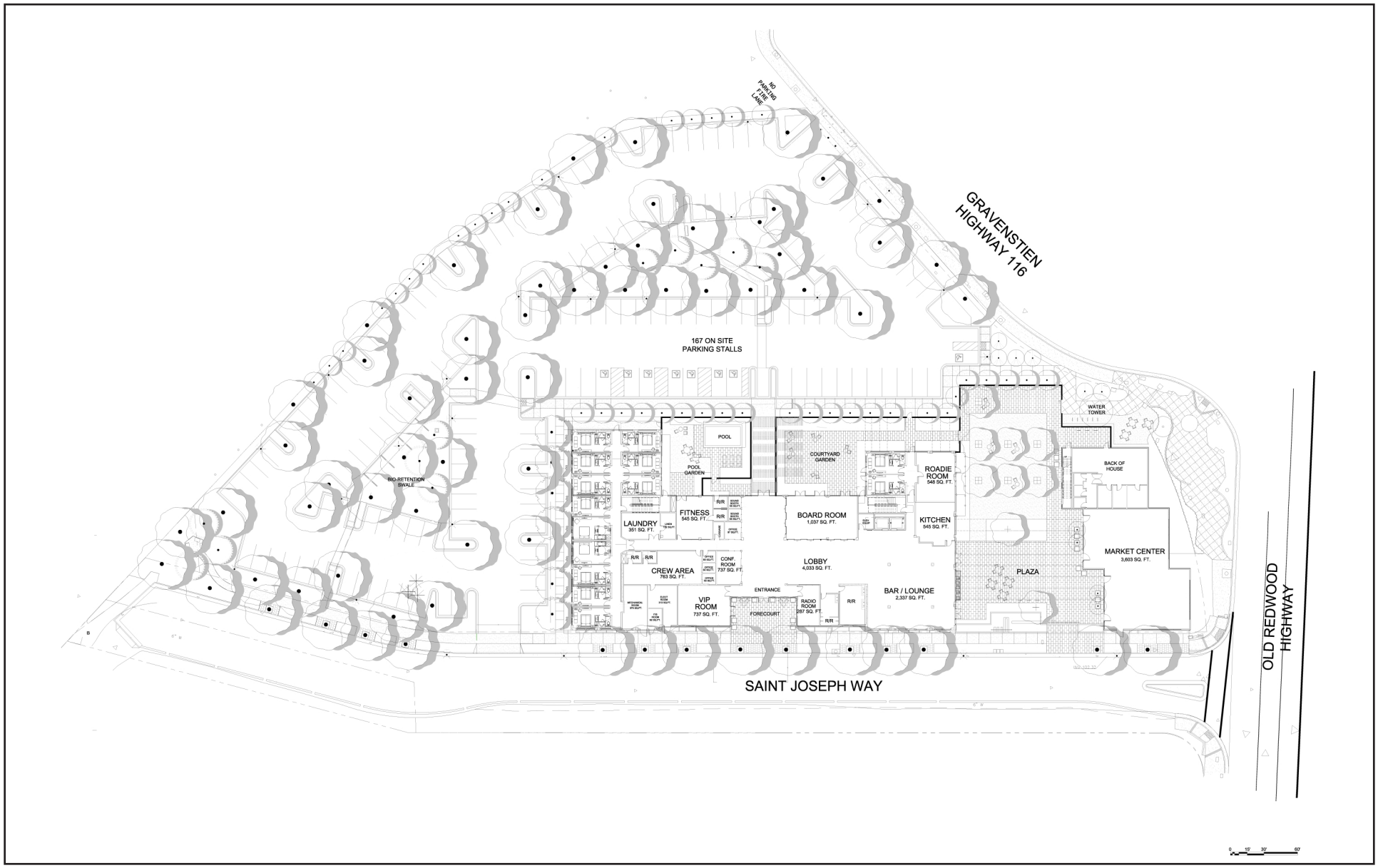
Source: Bing Aerial Imagery.

FIRSTCARBON SOLUTIONS™

700 350 0 700
Feet

Exhibit 2
Local Vicinity Map
Aerial Base

THIS PAGE INTENTIONALLY LEFT BLANK



Source: Worth Group Architects & Designers, April 1, 2019.

FIRSTCARBON SOLUTIONS™

Exhibit 3
Site Plan

THIS PAGE INTENTIONALLY LEFT BLANK

Source: ARCHI|LOGIX, January 23, 2019.

FIRSTCARBON SOLUTIONS™

Exhibit 4a
Hotel Elevations

THIS PAGE INTENTIONALLY LEFT BLANK

Source: ARCHI|LOGIX, January 23, 2019.

FIRSTCARBON SOLUTIONS™

Exhibit 4b
Market Hall and Water Tank Elevations

THIS PAGE INTENTIONALLY LEFT BLANK

1.5.10 - Construction

Construction activities would consist of grading, utility installation, building construction, and paving. For the purposes of this IS/MND, construction would occur over a 15-month period. Approximately 3,500 cubic yards of soil would be cut. Construction staging would occur on-site. The project would be constructed using modular units, and construction vehicles would travel on U.S. 101, SR-116, Old Redwood Highway, and St. Joseph Way to reach the project site.

1.5.11 - Employment

The project would support up to 40 full time equivalent positions. Staffing would be provided over three shifts (7:00 a.m. to 4:00 p.m.; 4:00 p.m. to 11:00 p.m.; and 11:00 p.m. to 7:00 a.m.).

1.6 - Required Discretionary Approvals

The project would require the following approvals from the City:

- Use Permit
- Design Review
- Variance for massing, floor area ratios (FARs), and hotel height exceedance
- IS/MND Adoption

Additionally, the following responsible and trustee agencies may use this IS/MND for subsequent approvals:

- United States Army Corps of Engineers—404 Permit
- United States Fish and Wildlife Service—Section 7 Consultation
- Bay Area Air Quality Management District
- California Department of Transportation—Encroachment Permit
- San Francisco Bay Regional Water Quality Control Board—Section 401 Water Quality Certification
- County of Sonoma
- Sonoma County Water Agency

THIS PAGE INTENTIONALLY LEFT BLANK

SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected					
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.					
☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
☐	Biological Resources	☐	Cultural/Tribal Cultural Resources	☐	Geology/Soils
☐	Greenhouse Gas Emissions	☐	Hazards/Hazardous Materials	☐	Hydrology/Water Quality
☐	Land Use/Planning	☐	Mineral Resources	☐	Noise
☐	Population/Housing	☐	Public Services	☐	Recreation
☐	Transportation/Traffic	☐	Utilities/Services Systems	☐	Mandatory Findings of Significance

Environmental Determination

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measure based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: April 5, 2019 Signed: _____

Jon-Paul Harries, Senior Planner

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Aesthetics *Except as provided in Public Resources Code Section 21099, would the project:*				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State scenic highway?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

Less than significant. The City of Cotati is located in the Cotati Valley, which is bordered by the Sonoma Mountains to the east and a series of low hills to the west. U.S. 101 is the main road in the area, and it offers views of the surrounding agricultural lands, undeveloped rolling hillsides, undeveloped watershed habitats, and creek corridors.

A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. The site itself does not offer broad views of the surrounding area, given its flat topography and surrounding development. There are no scenic vistas visible from the project site and would not have a substantial impact. The proposed building would be four stories and would be consistent with the City of Cotati General Plan and Cotati Downtown Specific Plan policies to maintain the character of the surrounding neighborhood and protect scenic resources. Therefore, the impact would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State scenic highway?

Less than significant. The Cotati General Plan has goals and policies that aim to preserve the City's rural character and natural resources, which include waterways, hillsides, wildlife habitats and historical resources. The Cotati General Plan has policies to preserve and protect the natural and scenic resources of Cotati.

The nearest officially designated State scenic highway is a segment of SR-116, approximately 7.1 miles northwest of the project site. The project site currently contains a park-and-ride surface parking area and a paved area that previously supported commercial structures. The proposed project would be a four-story hotel building. The project site has previously been developed, and no scenic or historic resources exist currently. Moreover, the segment of SR-116 closest to the project site is an eligible scenic highway, not an officially designated scenic highway. The segment of SR-116 that is an officially designated State scenic highway is northwest of the project site.

Vegetation on-site consists of several trees alongside the outer edges of the site and patches of wild grass. The vegetation does not add substantial scenic value to the project site. Impacts on scenic resources would be less than significant.

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?

Less than significant. The project site is bounded on the west by a U.S. 101 northbound off-ramp, on the north by Gravenstein Highway, on the east by Old Redwood Highway, and on the south by property owned by Oliver's Properties, LLC (Oliver's Markets). Currently, the existing project site contains a park-and-ride surface parking area and a paved area that previously supported commercial structures and does not support scenic or historic resources. Vegetation on-site consists of several trees alongside the outer edges of the site and patches of wild grass. As noted in Impact (b) above, the vegetation does not add substantial scenic value to the project site.

The proposed project would remove the existing park-and-ride lot and replace it with a hotel and Market Hall. The hotel would stand 53 feet above finished grade[1], while the Market Hall would stand 32 feet above finished grade. Both buildings would employ architectural elements to create visual interest. A decorative water tower would be provided along the Old Redwood Highway frontage, and stand up to 45 feet above finished grade.

The project site is located within the Northern Gateway district as identified in the City's Downtown Specific Plan, which is intended for a new mixed-use core for a wide variety of retail, restaurants and entertainment uses with offices and primarily residential above. The proposed project would be consistent with the City of Cotati Downtown Specific Plan, which identifies building types to ensure

[1] Rooftop equipment would stand up to 58 feet above finished grade

that the development is consistent with the City's goals for building form, size, massing, character, and quality. Additionally, the proposed project would be consistent with General Plan policies that call for promoting a distinctive brand and image for Cotati (EV 1.6) and encouraging the establishment of hospitality-related businesses in Cotati that emphasize the City's musical heritage and scenic landscapes (EV 1.7). Impacts would be less than significant.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than significant. The proposed project would develop a hotel and Market Hall on the project site. The project site currently contains a park-and-ride surface parking area and a paved area that previously supported commercial structures. With the proposed development, the project would increase the amount of light and glare compared with existing conditions. The new sources of light would come from the interior as well as the exterior lighting as well as some glare reflecting off surfaces.

The project would comply with applicable General Plan regulations regarding the lighting design and building materials designed to limit trespass lighting and glare. As a part of General Plan Action LU 3c, the City of Cotati would continue to ensure that excessive glare and impacts from light sources onto adjacent properties is avoided to minimize conflict with adjacent land uses. The project site's surrounding area is dominated by commercial uses, which are less sensitive to change in lighting levels. The project would not create a new source of light or glare that would substantially affect day or nighttime views in the area. Impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2. Agriculture and Forestry Resources *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*				
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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

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 impact. The project site does not support agricultural activities. The California Department of Conservation Farmland Mapping and Monitoring Program mapping for Sonoma County designates

the project site as "Urban and Built-Up." Therefore, development of the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.

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

No impact. The project site is zoned as "Northern Gateway," which is a non-agricultural zoning designation, intended as mixed use, accommodating retail and restaurants with office and residential units above. The land is not encumbered by a Williamson Act contract, as indicated by the Sonoma County Williamson Act Fiscal Year (FY) 2013/2014 map by the California Department of Conservation. Therefore, the proposed project would not conflict with any existing agricultural zoning or with a Williamson Act contract. No impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No impact. The project site is zoned as Northern Gateway, which is a non-forest land zoning district. This condition precludes the possibility of a conflict with a forest zoning designation. No impact would occur.

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

No impact. The project site does not contain, nor is it adjacent to, any forested land. As stated in the Public Resources Code, "Forest land" is land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allow for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The lack of forest land precludes the possibility of loss of forest land or its conversion to non-forest. No impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No impact. The project is not adjacent to or in the immediate vicinity of any existing agricultural operations. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance in Cotati. The project is not considered suitable forest land. This condition precludes the possibility of the loss of forest land. No indirect impacts on farmland or forest land would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
3. Air Quality *Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.* *Would the project:*				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
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?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Evaluation

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

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

Less than significant impact with mitigation incorporated. The project is located in the San Francisco Bay Area Air Basin (Air Basin), where air quality is regulated by the Bay Area Air Quality Management District (BAAQMD). The United States Environmental Protection Agency (EPA) is responsible for identifying non-attainment and attainment areas for each criteria pollutant within the Air Basin. The Air Basin is designated non-attainment for State standards for 1-hour and 8-hour ozone, 24-hour respirable particulate matter (PM_{10}), annual PM_{10}, and annual fine particulate matter ($PM_{2.5}$) (BAAQMD 2017).

To address regional air quality standards, the BAAQMD has adopted several air quality policies and plans, the most recent of which is the 2017 Clean Air Plan (CAP). The 2017 CAP was adopted in April of 2017 and serves as the regional air quality plan (AQP) for the Air Basin for attaining federal ambient air quality standards. The primary goals of the 2017 are to protect public health and protect the climate. The 2017 CAP acknowledges that the BAAQMD's two stated goals of protection

are closely related. As such, the 2017 CAP identifies a wide range of control measures intended to decrease both criteria pollutants[2] and greenhouse gases (GHGs).[3] In September 2010, BAAQMD adopted their final Bay Area 2010 CAP, which became the most recent ozone plan for the Air Basin. The 2010 CAP identifies how the Air Basin would achieve compliance with the State 1-hour air quality standard for ozone, and how the region will reduce ozone from transporting to other basins downwind wind of the Air Basin. The 2017 CAP updates the BAAQMD's 2010 CAP, pursuant to air quality planning requirements defined in the California Health and Safety Code.

The 2017 CAP also accounts for projections of population growth provided by Association of Bay Area Governments and vehicle miles traveled provided by the Metropolitan Transportation Commission, and identifies strategies to bring regional emissions into compliance with federal and State air quality standards. A project would be judged to conflict with or obstruct implementation of the 2017 CAP if it would result in substantial new regional emissions not foreseen in the air quality planning process.

The BAAQMD does not provide a numerical threshold of significance for project-level consistency analysis with AQPs. Therefore, the following criteria will be used for determining a project's consistency with the AQP.

- **Criterion 1:** Does the project support the primary goals of the AQP?
- **Criterion 2:** Does the project include applicable control measures from the AQP?
- **Criterion 3:** Does the project disrupt or hinder implementation of any AQP control measures?

Criterion 1

The primary goals of the 2017 CAP, the current AQP to date, are to:

- Attain air quality standards;
- Reduce population exposure to unhealthy air and protecting public health in the Bay Area; and
- Reduce greenhouse gas emissions and protect the climate.

As discussed under Impacts 3(b) and 3(c), the project would not significantly contribute to cumulative non-attainment pollutant violations or expose sensitive receptors to substantial pollutant concentrations. The project would be required to implement the mitigation measures identified under Impact 3(b), specifically Mitigation Measure (MM) AIR-1, to be consistent with Criterion 1. The project is therefore consistent with Criterion 1 significant after incorporation of identified mitigation.

[2] The EPA has established national ambient air quality standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as "criteria" air pollutants (or simply "criteria pollutants").

[3] A greenhouse gas (GHG) is any gaseous compound in the atmosphere that is capable of absorbing infrared radiation, thereby trapping and holding heat in the atmosphere. By increasing the heat in the atmosphere, GHGs are responsible for the greenhouse effect, which ultimately leads to global warming.

Criterion 2

The 2017 CAP contains 85 control measures aimed at reducing air pollutants and GHGs at the local, regional, and global levels. Along with the traditional stationary, area, mobile source, and transportation control measures, the 2017 CAP contains a number of control measures designed to protect the climate and promote mixed use, compact development to reduce vehicle emissions and exposure to pollutants from stationary and mobile sources. The 2017 CAP also includes an account of the implementation status of control measures identified in the 2010 CAP.

Table 1 lists the relevant CAP policies to the project and evaluates the project's consistency with the policies. As shown below, the project would be consistent with applicable measures and would not hinder the implementation of any AQP control measures.

Table 1: Project Consistency with Applicable Clean Air Plan Control Measures

Control Measure	Project Consistency
Stationary Control Measures	
SS29: Asphaltic Concrete	**Consistent.** Paving activities associated with the proposed project would be required to utilize asphalt that does not exceed BAAQMD emission standards.
SS33: Commercial Cooking Equipment	**Consistent.** If any of the proposed commercial kitchens install a charbroiler, a catalytic oxidizer system must also be installed pursuant to BAAQMD Rule 6-2.
SS36: Particulate Matter from Trackout	**Consistent with Mitigation.** Mud and dirt that may be tracked out onto the nearby public roads during construction activities shall be removed promptly by the contractor based on BAAQMD's requirements. MM AIR-1, identified under Impact 3(b), would implement Best Management Practices (BMPs) recommended by BAAQMD for fugitive dust emissions during construction.
SS37: Particulate Matter from Asphalt Operations	**Consistent.** Paving and roofing activities associated with the proposed project would be required to utilize best management practices to minimize the particulate matter created from the transport and application of road and roofing asphalt.
SS38: Fugitive Dust	**Consistent with Mitigation.** Material stockpiling and track out during grading activities, as well as smoke and fumes from paving and roofing asphalt operations, shall utilize BMPs to minimize the creation of fugitive dust. MM AIR-1, identified under Impact 3(b), would implement BMPs recommended by BAAQMD for fugitive dust emissions during construction.

Table 1 (cont.): Project Consistency with Applicable Clean Air Plan Control Measures

Control Measure	Project Consistency
Transportation Control Measures	
TR9: Bicycle and Pedestrian Access Facilities	**Consistent.** The proposed project would comply with TR9 by providing pedestrian connectivity within the project site and from the project site to surrounding land uses.
Buildings Control Measures	
BL1: Green Buildings	**Consistent.** The project will comply with the City's latest adopted energy efficiency standards (currently Mandatory Plus Tier 1 Green Building Standards) and incorporate applicable energy efficiency features designed to reduce project energy consumption.
BL2: Decarbonize Buildings	**Consistent.** The project will comply with the City's latest adopted energy efficiency standards (currently Mandatory Plus Tier 1 Green Building Standards) and incorporate applicable energy efficiency features designed to reduce project energy consumption.
BL4: Urban Heat Island Mitigation	**Consistent.** The project would incorporate landscaping throughout the site. The project would provide landscaping in accordance with City standards that would serve to reduce the urban heat island effect and would include the planting of shade trees.
Energy Control Measures	
EN2: Decrease Energy Use	**Consistent.** The project will comply with the City's latest adopted energy efficiency standards (currently Mandatory Plus Tier 1 Green Building Standards). Compliance with these energy efficiency standards would decrease building energy consumption relative to business as usual conditions.
Natural and Working Lands Control Measures	
NW2: Urban Tree Planting	**Consistent.** The project would incorporate landscaping throughout the site. The project would provide landscaping in accordance with City standards that would serve to reduce the urban heat island effect and would include the planting of shade trees.
Waste Management Control Measures	
WA3: Green Waste Diversion	**Consistent:** The solid waste provider would provide green waste collection, thereby allowing compostable materials to be diverted from the waste stream.
WA4: Recycling and Waste Reduction	**Consistent:** The solid waste provider would provide recycling pick-up, thereby allowing recoverable materials to be diverted from the waste stream.
Source: BAAQMD 2017.	

In summary, the project would not conflict with any applicable measures under the 2017 CAP after the implementation of MM AIR-1; therefore, the project would be consistent with Criterion 2 after incorporation of mitigation.

Criterion 3

The project will not preclude extension of a transit line or bike path, propose excessive parking beyond parking requirements, or otherwise create an impediment or disruption to implementation of any AQP control measures. As shown in Table 1 above, the project would incorporate several AQP control measures as project design features. The project is therefore consistent with Criterion 3.

Summary

As addressed above, the project would be consistent with all three criteria after the incorporation of MM AIR-1. Thus, the project would not conflict with the 2017 CAP. Therefore, impacts associated with conflicting with or obstructing implementation of the 2017 CAP would be less than significant with mitigation.

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?

Less than significant impact with mitigation incorporated. This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. As discussed in Impact 3(a), the region is non-attainment for the federal and State ozone standards, the State PM_{10} standards, and the federal and State $PM_{2.5}$ standards. Potential impacts would result in exceedances of State or federal standards for oxides of nitrogen (NO_X) or particulate matter (PM_{10} and $PM_{2.5}$). NO_X emissions are of concern because of potential health impacts from exposure to NO_X emissions during both construction and operation and as a precursor in the formation of airborne ozone. PM_{10} and $PM_{2.5}$ are of concern during construction because of the potential to emit exhaust emissions from the operation of off-road construction equipment and fugitive dust during earth-disturbing activities (construction fugitive dust).

Reactive Organic Gas (ROG) emissions are also important because of their participation in the formation of airborne ozone. Ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and that can cause substantial damage to vegetation and other materials. Elevated ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, elderly, and young children.

By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants is a result of past and present development within the air basin, and this regional impact is a cumulative impact. In other words, new development projects (such as the proposed project) within the air basin would contribute to this impact only on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air quality standards. Instead, a project's emissions may

be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects.

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the CEQA Guidelines, the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the project's incremental effects would be cumulatively considerable. Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the project would result in regional emissions that exceed the BAAQMD regional thresholds of significance for construction and operations on a project level. The thresholds of significance represent the allowable amount of emissions each project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAQMD thresholds of significance on the project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. Construction and operational emissions are discussed separately below.

Construction Emissions

During construction, fugitive dust (PM_{10} and $PM_{2.5}$) would be generated from site grading and other earth-moving activities. The majority of this fugitive dust would remain localized and would be deposited near the project site. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from this source. Exhaust emissions would also be generated from the operation of the off-road construction equipment, as shown in Table 2 and Table 3.

Construction Fugitive Dust

BAAQMD does not recommend a numerical threshold for fugitive dust particulate matter emissions. Instead, BAAQMD bases the determination of significance for fugitive dust on a consideration of the control measures to be implemented. If all appropriate emissions control measures are implemented for a project as recommended by BAAQMD, then fugitive dust emissions during construction are not considered significant.

As required by MM AIR-1, the project would implement BMPs recommended by BAAQMD for fugitive dust emissions during construction. Therefore, with mitigation, short-term construction impacts associated with violating an air quality standard or contributing substantially to an existing or projected air quality violation would be less than significant.

Construction Air Pollutant Emissions: ROG, NO_X, PM_{10}, $PM_{2.5}$

Version 2016.3.2 of the California Emissions Estimator Model (CalEEMod) was used to estimate the project's construction emissions. CalEEMod provides a consistent platform for estimating construction and operational emissions from a wide variety of land use projects and is the model recommended by the BAAQMD for estimating project emissions. Estimated construction emissions are compared with the applicable thresholds of significance established by the BAAQMD to assess ROG, NO_X, exhaust PM_{10}, and exhaust $PM_{2.5}$ construction emissions to determine significance for this criterion.

For the purpose of this analysis, construction of the project was assumed to begin in March of 2019 and conclude in June of 2020. The project applicant provided a tentative construction schedule; however, project-specific construction equipment assumptions are not currently known. CalEEMod default construction equipment schedule and equipment activity is based on detailed construction industry studies. Based on the applicant's construction schedule, the estimated number of work days is 327. Because the CalEEMod default and applicant-provided detailed total construction durations differ, the equipment horsepower-hours were adjusted to conserve the total horsepower-hours consistent with the default estimates. The assumptions used to estimate emissions and the complete CalEEMod results are provided in Appendix A. Construction emissions would likely decrease because of improvements in technology and more stringent regulatory requirements if the construction schedule moves to later years. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA guidelines. Annual construction emissions are shown by source in Table 3, while average daily construction emissions are compared with the significance thresholds in Table 4.

Table 2: Annual Construction Emissions (Unmitigated)

Construction Activity	Tons/Year			
	ROG	NO_X	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
2019				
Demolition	0.02	0.26	0.01	0.01
Site Preparation	<0.01	0.03	<0.01	<0.01
Grading	0.01	0.19	<0.01	<0.01
Building Construction—2019	0.23	1.79	0.08	0.08
Total 2019 Construction Emissions	0.27	2.26	0.10	0.10
2020				
Building Construction—2020	0.10	0.77	0.03	0.03
Paving	0.01	0.06	<0.01	<0.01
Architectural Coating	0.52	0.01	<0.01	<0.01
Total 2020 Construction Emissions	*0.63*	*0.84*	*0.04*	*0.04*
Total Construction Emissions	**0.90**	**3.10**	**0.14**	**0.13**

Notes:
ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
Unrounded numbers from the CalEEMod output were used for all calculations.
Source: CalEEMod Output (see Appendix A).

Table 3: Construction Emissions (Unmitigated Average Daily Rate)

Parameter	Air Pollutants			
	ROG	NO_X	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
Total Emissions (tons)	0.90	3.10	0.14	0.13
Total Emissions (lbs)	1,796	6,203	280	267
Average Daily Emissions (lbs/day)[1]	5.49	18.97	0.86	0.82
Significance Threshold (lbs/day)	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
[1] Calculated by dividing the total lbs by the total 327 working days of construction for the duration of construction (2019–2020).
Calculations use unrounded totals.
lbs = pounds ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
Source: CalEEMod Output (see Appendix A).

As shown in Table 3, the construction emissions from all construction activities are below the recommended thresholds of significance; therefore, the construction of the project would have less than significant impact in regards to emissions ROG, NO_X, exhaust PM_{10}, and exhaust $PM_{2.5}$. As previously discussed, the project would implement MM AIR-1 with BMPs recommended by the BAAQMD to reduce potential impacts related to fugitive dust emissions. Therefore, project construction would not 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. Construction activities would have a less than significant cumulative impact after implementation of mitigation.

Operations

Operational Air Pollutant Emissions: ROG, NO_X, PM_{10}, $PM_{2.5}$

Pollutants of concern during operations include ROG, NO_X, PM_{10}, and $PM_{2.5}$. Operations were analyzed assuming full-buildout in 2020. The major sources for operational emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$ are summarized in Appendix A. The project operational emissions for the respective pollutants were calculated using CalEEMod version 2016.3.2. The maximum daily operational emissions were modeled for summer and winter seasons. The results for the estimated maximum daily emissions are presented in Table 4 while unmitigated annual emissions from project operations are presented in Table 5.

Table 4: Daily Operational Emissions (Unmitigated)

Emissions Source	Pounds per Day			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area	2.37	<0.01	<0.01	<0.01
Energy	0.12	1.11	0.08	0.08
Mobile	2.89	13.29	5.14	1.42
Estimated Maximum Daily Emissions	5.38	14.40	5.23	1.51
Thresholds of Significance	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
ROG = reactive organic gases NO_X = nitrous oxides
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
Source: CalEEMod Output (see Appendix A).

Table 5: Annual Operational Emissions (Unmitigated)

Emissions Source	Tons per Year			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area	0.43	<0.01	<0.01	<0.01
Energy	0.02	0.20	0.02	0.02
Mobile	0.45	2.39	0.91	0.25
Estimated Annual Emissions	0.90	2.59	0.92	0.27
Thresholds of Significance	**10**	**10**	**15s**	**10**
Exceeds Significance Threshold?	No	No	No	No

Notes:
ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
Source: CalEEMod Output (see Appendix A).

As shown in Table 4 and Table 5 the project would not result in operational-related air pollutants or precursors that would exceed BAAQMD's thresholds of significance, indicating that ongoing project operations would not be considered to have the potential to generate a significant quantity of air pollutants. Therefore, long-term operational impacts associated with criteria pollutant emissions would be less than significant. Project operations would not 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. Therefore, operation of the project would have a less than significant cumulative impact.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. A sensitive receptor is defined by the BAAQMD as the following: "Facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals, and residential areas." Existing sensitive residential receptors are located to the west, south, and northeast of the project site.

The following four criteria were applied to determine the significance of project emissions to sensitive receptors:

- **Criterion 1:** Construction of the project would not result in an exceedance of the health risk significance thresholds.
- **Criterion 2:** Operation of the project would not result in an exceedance of the health risk significance thresholds.
- **Criterion 3:** The cumulative health impact would not result in an exceedance of the cumulative health risk significance thresholds.
- **Criterion 4:** A Carbon Monoxide (CO) hotspot assessment must demonstrate that the project would not result in the development of a CO hotspot that would cause an exceedance of the CO ambient air quality standards.

Criterion 1: Project Construction Toxic Air Pollutants

An assessment was made of the potential health impacts to surrounding sensitive receptors resulting from the emissions of Toxic Air Contaminants (TACs) during construction. A summary of the assessment is provided below, while the detailed assessment is provided in Appendix A of this IS/MND.

Diesel particulate matter (DPM) has been identified by the ARB as a carcinogenic substance. Major sources of DPM include off-road construction equipment and heavy-duty delivery truck and worker activities. For purposes of this analysis and consistent with BAAQMD guidelines, DPM is represented as exhaust emissions of $PM_{2.5}$.

Estimation of Construction DPM Emissions

Construction DPM emissions (as $PM_{2.5}$ exhaust) were estimated using CalEEMod version 2016.3.2, as described under the discussion for Impact 3(b). Construction was assumed to occur in a single phase and last for 15 months. The construction DPM emissions were assumed to be distributed over the project area with a working schedule of 8 hours per day and 5 days per week.

Construction exhaust emissions of DPM are shown in Table 6.

Table 6: Project DPM Construction Emissions—No Mitigation

Year	On-site DPM (gram/m^2-sec)	Off-site DPM From Hwy101-Gravestein Hwy to Site (grams/sec)
Annual Construction Emissions (Without Mitigation)		
2019	1.06E-06	8.81E-06
2020	8.43E-07	5.56E-06
Source: Appendix A		

Estimation of Cancer Risks

The BAAQMD has developed a set of guidelines for estimating cancer risks that provide adjustment factors that emphasize the increased sensitivities and susceptibility of young children to exposures to TACs (BAAQMD 2016). These adjustment factors include age-sensitivity weighting factors, age-specific daily breathing rates, and age-specific time-at-home factors. The recommended method for the estimation of cancer risk is shown in the equations below with the cancer risk adjustment factors provided in Table 7 for several types of sensitive/residential receptors (infant, child, and adult).

$$\text{Cancer Risk} = C_{DPM} \times \text{Inhalation Exposure Factor} \qquad \text{(EQ-1)}$$

Where:

Cancer Risk = Total individual excess cancer risk defined as the cancer risk a hypothetical individual faces if exposed to carcinogenic emissions from a particular source for specified exposure durations; this risk is defined as an excess risk because it is above and beyond the background cancer risk to the population; cancer risk is expressed in terms of risk per million exposed individuals.

C_{DPM} = Period average DPM air concentration calculated from the air dispersion model in $\mu g/m^3$

Inhalation is the most important exposure pathway to impact human health from DPM and the inhalation exposure factor is defined as follows:

$$\text{Inhalation Exposure Factor} = \text{CPF} \times \text{EF} \times \text{ED} \times \text{DBR} \times \text{AAF/AT} \qquad \text{(EQ-2)}$$

Where:

CPF = Inhalation cancer potency factor for the TAC: 1.1 (mg/kg-day)-1 for DPM
EF = Exposure frequency (days/year)
ED = Exposure duration (years of construction)
AAF = set of age-specific adjustment factors that include age sensitivity factors (ASF), daily breathing rates (DBR), and time at home factors (TAH)—see Table 7.
AT = Averaging time period over which exposure is averaged (days)

The OEHHA-recommended values for the various cancer risk parameters, shown in EQ 2, above, are provided in Table 7.

Table 7: Exposure Assumptions for Cancer Risk

Receptor Type	Exposure Frequency		Exposure Duration (years)	Age Sensitivity Factors (ASF)	Time at Home Factor (TAH) (%)	Daily Breathing Rate (DBR) [1] (L/kg-day)
	Hours/day	Days/year				
Sensitive/Residential—Infant						
3rd Trimester	24	350	0.25	10	85	361
0 to 2 year	24	350	1.26	10	85	1,090
Sensitive Receptor—Child						
3 to 16 years	24	350	1.26	3	72	572
Sensitive Receptor—Adult						
> 16 years	24	350	1.26	1	73	261

Notes:
[1] The daily breathing rates recommended by the BAAQMD for sensitive/residential receptors assume the 95th percentile breathing rates for all individuals less than 2 years of age and 80th percentile breathing rates for all older individuals.
(L/kg-day) = liters per kilogram body weight per day
Source: BAAQMD 2016. Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/rules-and-regs/workshops/2016/reg-2-5/hra-guidelines_clean_jan_2016-pdf.pdf?la=en.

Estimation of Non-Cancer Chronic Hazards

An evaluation of the potential non-cancer effects of chronic chemical exposures was also conducted. Adverse health effects are evaluated by comparing the annual receptor concentration of each chemical compound with the appropriate reference exposure level (REL). Available RELs promulgated by the California Office of Environmental Health Hazards Assessment (OEHHA) were considered in the assessment.

Risk characterization for non-cancer health hazards from TACs is expressed as a hazard index (HI). The HI is a ratio of the predicted concentration of the project's emissions to a concentration considered acceptable to public health professionals, termed the REL.

To quantify non-carcinogenic impacts, the hazard index approach was used.

$$HI = C_{ann}/REL \qquad (EQ\text{-}3)$$

Where:

HI = chronic hazard index
C_{ann} = annual average concentration of TAC as derived from the air dispersion model ($\mu g/m^3$)
REL = reference exposure level above which a significant impact is assumed to occur ($\mu g/m^3$)

The hazard index assumes that chronic sub-threshold exposures adversely affect a specific organ or organ system (toxicological endpoint). For each discrete chemical exposure, target organs presented in regulatory guidance were used. To calculate the hazard index, each chemical concentration or dose is divided by the appropriate toxicity REL. For compounds affecting the same toxicological

endpoint, this ratio is summed. Where the total equals or exceeds 1, a health hazard is presumed to exist. For purposes of this assessment, the TAC of concern is DPM for which the OEHHA has defined a REL for DPM of 5 µg/m^3. The principal toxicological endpoint assumed in this assessment was through inhalation.

Estimation of Health Risks and Hazards from Project Construction

The estimated health and hazard impacts at the maximum impacted sensitive receptor (MIR) from the project's construction emissions are provided in Table 8. The MIR was found at an existing residence located approximately 460 feet northeast of the project, off Old Redwood Highway.

Table 8: Estimated Health Risks and Hazards—Project Construction

Source	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[(2)]	Annual $PM_{2.5}$ Concentration (µg/m^3)
Risks and Hazards at the MIR[(1)]			
Risks and Hazards at the MIR: Infant	10.4	0.01	0.07
Risks and Hazards at the MIR: Child	2.1	0.01	0.07
Risks and Hazards at the MIR: Adult	0.3	0.01	0.07
BAAQMD Thresholds of Significance	**10**	**1**	**0.30**
Exceeds Individual Source Threshold?	**Yes**	**No**	**No**

Notes:
MIR = maximum impacted sensitive receptor
(1) The MIR is an existing residence located approximately 460 feet northeast of the project, off Old Redwood Highway.
(2) Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the REL of 5 µg/m^3.
Source: Appendix A.

As shown above in Table 8, the non-cancer hazard index and $PM_{2.5}$ impacts at the MIR would not exceed the BAAQMD's recommended thresholds of significance; however, cancer risks for infants at the MIR would exceed the BAAQMD's recommended threshold of significance for cancer risk. Therefore, mitigation is required to reduce potential impacts to nearby sensitive receptors from project construction.

MM AIR-2 would require all off-road construction equipment in excess of 50 horsepower used on-site by the developer or contractors be equipped with engines meeting the EPA Tier III off-road engine emission standards. This would reduce cancer risks and hazards associated with construction emissions. Table 9 summarizes the project's estimated cancer risks and hazard impacts at the MIR from the project's construction emissions with the application of Tier III mitigation.

Table 9: Estimated Health Risks and Hazards During Construction—Tier III Mitigation

Health Impact Metric	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[(2)]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Risks and Hazards at the MIR [(1)]			
Risks and Hazards at the MIR: Infants	8.03	0.01	0.05
Risks and Hazards at the MIR: Child	1.7	0.01	0.05
Risks and Hazards at the MIR: Adult	0.3	0.01	0.05
BAAQMD Thresholds of Significance	**10**	**1**	**0.30**
Exceeds Individual Source Threshold?	**No**	**No**	**No**

Notes:
MIR = maximum impacted sensitive receptor
(1) The MIR is an existing residence located approximately 460 feet northeast of the project, off Old Redwood Highway.
(2) Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the REL of 5 $\mu g/m^3$.
Source: Appendix A.

As noted in Table 9, the project's construction emissions would not exceed the BAAQMD's significance threshold at the MIR after implementation of MM AIR-2. Therefore, with implementation of Tier III mitigation, the project's construction emissions would not result in significant health impacts to nearby sensitive receptors during the construction period.

Criterion 2: Project-Specific Operation Toxic Air Pollutants

The proposed project would primarily generate trips for visitors, employees, and customers traveling to and from the project site. Although the project would receive diesel truck deliveries, this would represent a very small percentage of daily trips. Instead, most daily trips would be made by passenger vehicles, which are gasoline-combusted and, thus, would not generate significant amount of DPM emissions during operation. Therefore, the project would not result in significant health impacts to nearby sensitive receptors during operation.

Criterion 3: Cumulative HRA

The BAAQMD recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project. As a result, a cumulative HRA was performed that examined the cumulative impacts of the project's construction emissions and sources of TAC emissions within 1,000 feet of the project. Based on proximity to the project site, the MIR was determined to be a residence located approximately 460 feet northeast of the project, off Old Redwood Highway. Therefore, the cumulative health impacts were estimated at this location.

For a project-level analysis, BAAQMD provides three tools for use in screening potential sources of TACs. These tools are:

- **Surface Street Screening Tables.** BAAQMD pre-calculated potential cancer risks and $PM_{2.5}$ concentration increases for each county within their jurisdiction for roadways that meet BAAQMD's "major roadway" criteria of 10,000 vehicles or 1,000 trucks per day. Risks are assessed by roadway volume, roadway direction, and distance to sensitive receptors. The Old Redwood Highway located 20 feet west of the project site would generate 24,000 vehicle trips per day.
- **Freeway Screening Analysis Tool**. BAAQMD prepared a Google Earth file that contains pre-estimated cancer risk, hazard index, and $PM_{2.5}$ concentration increases for highways within the Bay Area. Risks are provided by roadway link and are estimated based on direction and distance to the sensitive receptor. U.S. 101 is located 158 feet west of the project site (as measured to the edge of pavement). In 2016, this segment of U.S. 101, co-designated as SR-116, carried an average of 103,000 daily trips. SR-116 is located adjacent to and north of the project site.
- **Stationary Source Risk and Hazard Screening Tool**. BAAQMD prepared a Google Earth file that contains the locations of all stationary sources within the Bay Area that have BAAQMD permits. For each emissions source, BAAQMD provides conservative estimates of cancer risk, non-cancer hazards, and $PM_{2.5}$ concentrations. There are eight existing stationary sources located within 1,000 feet of the site boundary. Applying this screening tool indicated the presence of several stationary sources located within the 1,000 feet radius from the project site:
  1. Unocal Service Station with Plate Number G4822 is located approximately 88 feet east of the project site along Old Redwood Hwy.
  2. Atlantic Richfield Company Service Station C/O Stantec with Plate Number 10450 is located approximately 99 feet east of the project site along Gravenstein Hwy.
  3. Conoco Philips Service Station C/O Stantec Consulting with Plate Number 19866 is located approximately 300 feet northwest of the project site along Gravenstein Hwy.
  4. Santa Rosa Recycling and Collection with Plate Number 15694 is located approximately 330 feet northwest of the project site along Gravenstein Hwy.
  5. Convenience Retailers LLC with Plate Number G9580 is located approximately 320 feet northwest of the project site along Gravenstein Hwy.
  6. Valero Service Station with Plate Number G11461 is located approximately 340 feet northwest of the project site along Gravenstein Hwy.
  7. Redwood Reliance Sales Co with Plate Number 17970 is located approximately 534 feet west of the project site along Redwood Drive.
  8. USA Service Station No. 68122 with Plate Number G11812 is located approximately 1064 feet southeast of the project site along Old Redwood Hwy.

The cumulative health risk results are summarized in Table 10 during project construction. The methodology used to create the summary presented in Table 10 is described in detail in Appendix A.

Table 10: Summary of the Cumulative Health Impacts at the MIR during Construction

Source	Source Type	Distance from MIR[1] (feet)	Cancer Risk (per million)	Chronic HI	$PM_{2.5}$ Concentration ($\mu g/m^3$)
Project					
Construction (no mitigation)	Diesel Construction Equipment	460	10.4	0.01	0.07
Existing Stationary Sources (BAAQMD Facility Number)[2],[3]					
G4822	Stationary Source	184	17.0	<0.01	ND
10450	Stationary Source	>1,000	0.0	0.0	0.0
19866	Stationary Source	>1,000	ND	ND	ND
15694	Stationary Source	>1,000	0.0	0.0	0.0
G9580	Stationary Source	>1,000	0.798	<0.01	0.0
G11461	Stationary Source	>1,000	0.228	<0.01	ND
17970	Stationary Source	>1,000	0.0—	<0.01	0.0
G11812	Stationary Source	>1,000		—	—
Freeway					
U.S. 101	Freeway	652	10.17	0.01	0.10
State Route 116	Freeway	906	3.99	<0.01	0.03
Local Roads (>10,000 AADT)					
Old Redwood Hwy	Local Roads	155	7.32	ND	0.18
Cumulative Health Risks					
Cumulative Total with Project Construction			53.4	0.05	0.39
BAAQMD's Cumulative Thresholds of Significance			**100**	**10**	**0.8**
Threshold Exceedance?			No	No	No

Notes:
[1] The MIR is an existing residence located approximately 460 feet northeast of the project, off Old Redwood Highway.
[2] Cancer risks reflect the current BAAQMD cancer risk guidance for diesel generators and gasoline stations
[3] Assumes emissions remain constant with time
NA = no data available
Source: Appendix A.

As noted in Table 10, the cumulative impacts from the project construction and existing sources of TACs would be less than the BAAQMD's cumulative thresholds of significance. Thus, the cumulative health risk impacts from project construction would be less than significant.

Criterion 4: CO Hotspot

Operational Carbon Monoxide Hotspot

The CO emissions from traffic generated by the project are a concern at the local level. Congested intersections can result in high, localized concentrations of CO.

The BAAQMD recommends a screening analysis to determine if a project has the potential to contribute to a CO hotspot. The screening criteria identify when site-specific CO dispersion

modeling is necessary. The project would result in a less than significant impact to air quality for local CO if the following screening criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans; or
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; or
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

As indicated in Section 16, Transportation, the project would not conflict with the applicable congestion management plan. No intersections impacted by the project would experience traffic volumes of 44,000 vehicles per hour. According to the transportation impact analysis prepared for the project by TJKM (2018), the intersection of 101 SB Ramps and Gravenstein Highway would experience the highest cumulative peak-hour traffic volumes among the intersections impacted by the project, with 5,771 vehicles per hour during the PM peak-hour for the Cumulative Plus Project Scenario (Appendix E). Furthermore, the adjacent roadways are not located in an area where vertical or horizontal atmospheric mixing is substantially limited. Therefore, based on the above criteria, the project would not exceed the CO screening criteria and would have a less than significant impact related to CO.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than significant impact. As stated in the BAAQMD 2017 Air Quality Guidelines, odors are generally regarded as an annoyance rather than a health hazard and the ability to detect odors varies considerably among the populations and overall is subjective.

The BAAQMD does not have a recommended odor threshold for construction activities. However, BAAQMD recommends screening criteria that are based on distance between types of sources known to generate odor and the receptor. For projects within the screening distances, the BAAQMD has the following threshold for project operations:

> An odor source with five (5) or more confirmed complaints per year averaged over three years is considered to have a significant impact on receptors within the screening distance shown in Table 3-3 [of the BAAQMD's guidance].

Two circumstances have the potential to cause odor impacts:

1) A source of odors is proposed to be located near existing or planned sensitive receptors, or
2) A sensitive receptor land use is proposed near an existing or planned source of odor.

Projects that would site an odor source or a receptor farther than the applicable screening distance, shown in Table 11 below, would not likely result in a significant odor impact.

Table 11: Odor Screening Distances

Land Use/Type of Operation	Project Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Source: BAAQMD 2017.	

Project Construction

Odors from diesel exhaust, architectural coatings, and asphalt paving would be emitted during construction of the project, which are objectionable to some; however, emissions would be temporary and would disperse rapidly from the project site. Therefore, construction of the proposed project would not create objectionable odors affecting a substantial number of people. As such, impacts would be less than significant.

Project Operation

The project proposes to develop a four-story hotel associated amenities including a Market Hall, Board Room, Hotel Lounge, pool, and courtyard. None of the proposed uses are typical major odor-generating land uses. Land uses typically associated with odors include wastewater treatment facilities, waste-disposal facilities, agricultural operations, and other sources shown above in Table 11. Minor sources of odors, such as exhaust from mobile sources, are not typically associated with numerous odor complaints but are known to have temporary and less concentrated odors. The project could include up to two commercial kitchens that would generate odors from cooking processes and waste disposal. Odors generated from cooking would be dispersed through appropriate ventilation and fans in compliance with local and State regulations. Through compliance

with regulations, the project would not produce a significant amount of odors. Therefore, the project's long-term operational activities would not have any substantial odor sources that would expose nearby receptors. Impacts would be less than significant.

Mitigation Measures

MM AIR-1 During construction activities, the following air pollution control measures shall be implemented:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks shall be paved as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

MM AIR-2 During construction activities, all off-road equipment with engines greater than 50 horsepower shall meet either EPA or ARB Tier III off-road emission standards. The construction contractor shall maintain records concerning its efforts to comply with this requirement, including equipment lists. Off-road equipment descriptions and information may include but are not limited to equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, and engine serial number.

If engines that comply with Tier III off-road emission standards are not commercially available, then the construction contractor shall use the next cleanest piece of off-road equipment (e.g., Tier II) available. For purposes of this mitigation measure,

"commercially available" shall mean the availability of Tier III engines taking into consideration factors such as (i) critical-path timing of construction; and (ii) geographic proximity to the project site of equipment. The contractor can maintain records for equipment that is not commercial available by providing letters from at least two rental companies for each piece of off-road equipment where the Tier III engine is not available.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Biological Resources *Would the project:*				
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?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
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?	☐	☒	☐	☐
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 wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☒

Supporting information is provided in Appendix B.

Environmental Evaluation

Would the project:

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?

Less than significant impact with mitigation incorporated. Special-status plant and wildlife species typically occur in undeveloped areas. Although it is less likely, it is also possible for them to occur within developed areas. The project site is located adjacent to U.S. 101 and contains characteristics of land that has been developed or disturbed, including disturbed soils, impervious surfaces, and the presence of invasive and non-native ruderal plant species on-site. While nine special-status plant and eleven special-status wildlife species were considered to potentially occur on-site[4] (refer to Appendix B), it is not likely that species would use or inhabit the site because of the absence of suitable and preferred habitat. However, potential impacts occurring to special-status species, if they were found on-site, would be significant.

A plant's species potential to occur on the project site was based on the presence of suitable habitats, soil types, and occurrences recorded by the United States Fish and Wildlife Service (USFWS), California Native Plant Society, or California Natural Diversity Database in the region, previous biological documents and observations made during the January 5, 2018 reconnaissance field survey. Nine special-status plant species were evaluated for their potential for occur within the project site (Appendix B). It was determined that the project site contained mostly disturbed areas and dense non-native vegetation and, thus, lacked suitable habitat for all nine special-status plant species. Thus, no special-status plant species have the potential to occur within the project site; therefore, no special-status plant species would be impacted by project construction.

Based upon the types of habitat that each special-status wildlife species occupies, and observations made during the January 5, 2018 reconnaissance field survey, each wildlife species was evaluated for its potential to occur within the project site. No federally listed, State listed special-status species or sensitive species were found during the site visit. Because of the highly urbanized context of the project site and overall lack of suitable habitat, no special-status wildlife species have the potential to occur within the project site. However, trees within and adjacent to the project site provide potential habitat for special-status bird species, such as the red-tailed hawk (*Buteo jamaicensis*), as well as non-special-status migratory raptors and passerine bird species protected by the Migratory Bird Treaty Act (MBTA). Additionally, the California tiger salamander (*Ambystoma californiense*) does have listed territory in the Santa Rosa Plain Conservation Strategy Study Area, which the proposed project site falls into as well. The site is listed as "Previously Developed" and due to the high level of

[4] The plant species are Sonoma sunshine, papoose tarplant, congested-headed hayfield tarplant, Burke's goldfields, Sebastopol meadowfoam, marsh microseris, North Coast semaphore grass, two-fork clover, and saline clover. The wildlife species are tricolored blackbird, California tiger salamander, burrowing owl, western bumble bee, western yellow-billed cuckoo, western pond turtle, California linderiella, steelhead (Central California Coast distinct population segments [DPS]), foothill yellow-legged frog, California red-legged frog, and American badger.

disturbance experienced at the site and in the surrounding areas; it is highly unlikely for the presence of the California tiger salamander to occur within project boundaries.

Construction activities could disturb nesting and breeding birds in trees and shrubs within and around the construction site. Potential impacts on special-status and migratory birds that could result from the construction and operation of the project include the destruction of eggs or occupied nests, mortality of young, and the abandonment of nests with eggs or young birds prior to fledging. If these species were found to be present, impacts to these species would be significant. Mitigation Measure BIO-1 would reduce impacts to migratory and nesting raptors protected under the MBTA to a less than significant level.

Additionally, pursuant to the Downtown Specific Plan, the loss of non-native grassland would be offset through the use of native seed mix as required by MM BIO-2. The implementation of this mitigation measure would reduce impacts to a level of less than significance.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less than significant impact after mitigation. The project site does not contain any waterways and thus does not contain riparian habitat. The project site does contain four, linear, seasonal wetland areas totaling approximately 0.11 acre. These seasonal wetlands lack any riparian features, such as a bed, bank, or associated riparian vegetation. As such, these features would not likely be regulated by the California Department of Fish and Wildlife (CDFW) through the Section 1602 Streambed Alteration Agreement Permitting Process. However, these features are considered sensitive natural communities. MM BIO-3 would reduce impacts to federally protected wetlands to a less than significant level. Refer to the next impact discussion for detail discussion of the jurisdictional features.

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?

Less than significant impact after mitigation. The project site was initially assessed for the presence or absence of waters of the United States or State; a follow-up jurisdictional delineation of wetlands or other waters of the United States was conducted in March 2018, by FirstCarbon Solutions (FCS) biologists. The project site was found to contain four, linear, seasonal wetland areas totaling approximately 0.11 acre. In consideration of the results, the potential jurisdictional features would be regulated by the United States Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB). Any fill or otherwise removal of the wetlands the remaining wetland areas is likely to require a permit with the USACE and RWQCB through the Clean Water Act permitting process and Section 401 Water Quality Certification respectively. MM BIO-3 would reduce potential impacts to federally protected wetlands to a less than significant level.

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 wildlife nursery sites?

Less than significant impact with mitigation incorporated. The project site is located within the City's Downtown Specific Plan. According to the City's Downtown Specific Plan EIR, there are no established native resident or migratory corridors within the Downtown Specific Plan area. Furthermore, the project site is completely surrounded by roadways; U.S. 101 to the west, Gravenstein Highway to the north, Old Redwood Highway to the east, and St. Joseph Way to the south. However, as discussed under Impact 4(a), the project may have adverse effects on nesting birds and raptors, including special-status birds and species protected under the MBTA. Impacts to these species would be potentially significant. MM BIO-1 would reduce these impacts to a level that would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than significant impact. The project site contains two eucalyptus trees adjacent to St. Joseph Way that are planned for removal by the City of Cotati. The trees are being removed for public safety. There are no other trees on the project site. Therefore, impacts related to the City's tree preservation and protection policy would be less than significant.

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

No impact. The project site is within the Santa Rosa Plain Conservation Strategy Plan (SRPCSP) and the Recovery Plan for the Santa Rosa Plain. SRPCSP Figure 3 shows that the project site is in an area designated as "already developed (no potential for impact)." Project site approximately 150 feet from a site designated as "potential for presence of California Tiger Salamander." The project site is located within a Sonoma County California tiger salamander Core Area of the Santa Rosa Plain according to the Recovery Plan Figure 13. However, because the project site supports disturbed areas and non-native vegetation, it does not contain suitable habitat for the California Tiger Salamander. As such, no conflicts with the SRPCSP would occur. No impact would occur.

Mitigation Measures

MM BIO-1 If construction or tree removal is proposed during the breeding/nesting season for local avian species (typically March 1 through August 31), a focused survey for active nests of raptors and migratory birds within and in the vicinity of (no less than 500 feet outside the project boundaries, where possible) the project site shall be conducted by a qualified biologist. These species include the Loggerhead shrike and common passerines. The survey shall be conducted no more than 14 days prior to tree removal or construction activities. If no active nests are found, tree removal or construction activities may proceed.

If an active nest is located during pre-construction surveys, the United States Fish and Wildlife Service or the California Department of Fish and Wildlife (as appropriate) shall be notified regarding the status of the nest. The resource agency's recommendation for a buffer distance shall be used as the basis for establishing a protection buffer. Furthermore, construction activities shall be restricted to avoid disturbance of the nest until it is abandoned or the biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones or alteration of the construction schedule.

MM BIO-2 No more than 60 days of issuance of the first certificate of occupancy, the applicant shall re-seed portions of the project site that are outside the limits of grading with native seed mix.

MM BIO-3 If project construction would result in the fill or partial fill of wetlands identified by the jurisdictional determination; as such, the applicant shall do the following prior to issuance of grading permits:

1. Apply for a Section 404 permit from the USACE. Waters of the United States that would be lost or disturbed shall be replaced or rehabilitated on a "no net loss" basis in accordance with the USACE mitigation guidelines. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods agreeable to the USACE.
2. Obtain a Section 401 water quality waiver of certification from the RWQCB.
3. A mitigation plan shall be implemented that includes one of the following:
   (a) Completion of an on-site Mitigation and Monitoring Plan that includes on-site creation/preservation of the wetlands at no less than 1:1; or
   (b) Purchase of credits from an approved mitigation bank at no less than 1:1.
4. The project applicant shall provide written evidence to the City from the USACE and the RWQCB that this measure has been complied with prior to issuance of grading permits.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
5. Cultural and Tribal Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
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:				
e) 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 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.	☐	☒	☐	☐

A Cultural Resources Assessment is provided in Appendix C.

Environmental Evaluation

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?

Less than significant impact with mitigation incorporated. A cultural resources assessment was conducted for the project area by FCS and Condor Country Consulting in 2017 (Appendix C). The assessment consisted of a Northwest Information Center (NWIC) records search, archival research, outreach to the Native American Heritage Commission (NAHC) and tribal representatives and a pedestrian survey of the site. A records search conducted at the NWIC on December 19, 2017 revealed that nine previous archaeological surveys had addressed portions of the Study Area, one of which assessed the Study Area in its entirety. An additional 17 survey reports covered portions of a 0.5-mile radius surrounding the project boundaries. The records search revealed 17 previously

recorded cultural resources within a 0.5-mile radius surrounding the Study Area. There is one previously recorded archaeological site in the proposed Study Area, site P-49-004786. Site P-49-004786 is an historic-era trash scatter described as including fragments of white improved earthenware ceramic tableware vessels, colorless pressed glass vessels, window glass, 0.25-inch thick aqua flat glass, and ferrous metal hardware. At the time of discovery, the site had not been evaluated for eligibility for inclusion in the National Register of Historic Places or the California Register of Historical Resources, but the site appeared to have been disturbed.

Site P-49-004786 was evaluated as part of the Cultural Resources Assessment for the proposed project and was found to lack integrity of location, design, materials, workmanship, feeling, and association. The Cultural Resources Assessment also determined the following regarding Site P-49-004786: 1) It was not associated with any events that have made a significant contribution to broad patterns of history; 2) It was not associated with the lives of persons significant in the past; 3) It did not embody the distinctive characteristics of a type, period, or method of construction; 4) It does not represent the work of a master; and 5) It has not yielded or is likely to yield, information important in prehistory or history. As such, it was determined to be ineligible for the California Register of Historical Resources and National Register of Historic Places, and does not qualify as a historical resource under CEQA.

Given the presence of P-49-004786 in the project area, the likelihood of encountering additional undiscovered historic resources during project construction is considered moderate. Subsurface construction activities always have the potential to damage or destroy previously undiscovered cultural resources. Historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Accordingly, implementation of MM CUL-1 would reduce potential impacts to historic resources to a less than significant level.

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

Less than significant impact with mitigation incorporated. As discussed above, a cultural resources assessment was conducted for the project area in 2017. The records search revealed 17 previously recorded cultural resources within a 0.5-mile radius, one of which was prehistoric in nature. The prehistoric site (P-49-00648; CA-SON-000705), consists of a midden site with the shell and lithics originally recorded in 1973. This site is not located in close proximity to the project area, and would not be adversely affected by the proposed project. However, its presence in the surrounding vicinity indicates a moderate to low likelihood of encountering undiscovered prehistoric archaeological resources during project development. Such resources could consist of but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Accordingly, this would be a potentially significant impact. Implementation of MM CUL-1 would ensure that this potential impact is reduced to a less-than-significant level.

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

Less than significant impact with mitigation incorporated. No human remains or cemeteries are known to exist within or near the project area. However, there is always the possibility that subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. Accordingly, this is a potentially significant impact. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. In the unlikely event human remains are discovered, implementation of MM CUL-3 would reduce this potential impact to a less then significant level.

Tribal Cultural Resources

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:

e) 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 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.

Less than significant impact with mitigation incorporated. A review of the California Register of Historical Resources, local registers of historic resources, and a records search conducted at the NWIC failed to identify any listed Tribal Cultural Resources (TCRs) that may be adversely affected by the proposed project. Letters containing a project map and details were sent to the Cotati Historical Society, Sonoma County Historical Society, and the NAHC. A response from the NAHC indicated that the Sacred Lands File search did not identify any TCRs in the immediate project area, and that tribal representatives should be contacted for additional information. Six individuals were identified by the NAHC as having potential interest in the project, including The Tribal Historic Preservation Officers for Federated Indians of Graton Rancheria (FIGR), Stewart's Point Rancheria Kashia Band of Pomo Indians, the Middletown Rancheria, and a lawyer from Tamaras and Ogas, LLC., a law firm representing Lytton Rancheria of California. Letters were followed with a phone call and/or email approximately one week after the mailing. While some parties expressed interest in the project (see Appendix C).

The City of Cotati conducted tribal consultation efforts pursuant to AB-52 including notification of tribes. In accordance with Public Resources Code Section 21080.3.1(d), the City of Cotati provided written formal notification to the FIGR on February 27, 2019, which included a brief description of the proposed project and its location, the Cultural Resources Assessment Report, the City of Cotati's contact information, and a notification that FIGR has 30 days to request consultation. In a letter dated February 28, 2019, Buffy McQuillen, Tribal Heritage Preservation Officer representing the FIGR, requested formal tribal consultation for the project. On February 28, 2019, the City entered

into formal consultation with FIGR. On March 28, 2019, the City met with FIGR representatives to discuss the project's potential to affect TCRs. FIGR identified a potential for an inadvertent discovery of TCRs, such as Native American artifacts or burials, during site grading and excavation. FIGR requested that a Tribal representative be present during ground disturbance activities, and that ground disturbance activities be halted if potentially significant tribal cultural resources are encountered until the resources can be assessed.

As such, construction activities could result in a potentially significant impact to buried tribal cultural resources, if not properly mitigated. In response to formal consultation with FIGR, and to ensure that undiscovered TCRs, such as Native American artifacts or burials are protected, MM CUL-3 shall be implemented. MM CUL-3 requires that a Tribal representative from the FIGR be present on-site during initial ground disturbing activities to observe for tribal cultural resources that could be encountered. MM CUL-3 grants the Tribal representative and/or FIGR Tribal Heritage Preservation Officer the authority to stop work in the event of a discovery. Further, MM CUL-3 requires that construction activities be halted until the Tribal representative and/or FIGR Tribal Heritage Preservation Officer can evaluate the resource and make treatment recommendations. Last, MM CUL-3 requires that a resource mitigation plan and monitoring program be carried out during all construction activities should a significant tribal cultural resource be identified. With implementation of MM CUL-3, potential impacts to tribal cultural resources are reduced to a less-than-significant level.

Mitigation Measures

MM CUL-1 An archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology, and is considered a qualified archaeologist by the FIGR, should be present during the initial phase of ground disturbance in order to check for the inadvertent exposure of cultural materials. This may be followed by regular periodic or "spot-check" archaeological monitoring during ground disturbance as needed, but full-time archaeological monitoring is not required at this time. In the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 50-foot radius of the find shall cease and workers should avoid altering the materials until a qualified archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology has evaluated the situation. The Applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction activities shall be recorded on appropriate Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified archaeologist. Potentially significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. If the resource is determined to be significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the CEQA Guidelines. The archaeologist shall also perform appropriate technical

analyses, prepare a comprehensive report complete with methods, results, and recommendations, and provide for the permanent curation or repatriation of the recovered resources in cooperation with the designated Most Likely Descendant (MLD) as needed. The report shall be submitted to the City of Cotati, the Northwest Information Center, and the State Historic Preservation Office, if required.

MM CUL-2 In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance within 100 feet of the remains until the Sonoma County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the MLD of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.
2. Where the following conditions occur, the landowner or his or her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project site in a location not subject to further subsurface disturbance:
   - The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being given access to the site.
   - The descendant identified fails to make a recommendation.
   - The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

MM CUL-3 During initial ground disturbance activities, a Tribal representative from the FIGR shall be present onsite to monitor ground disturbance, and observe for the presence of tribal cultural resources. The Tribal representative shall be permitted to access the construction site, observe activities, and shall be granted the authority to issue to issue a stop work order in the event that a tribal cultural resource or potential tribal cultural resource is identified. If a potentially significant tribal cultural resource is encountered, all ground disturbing activities within 25 feet of the discovery, or other appropriate buffer, shall halt until the Tribal representative and/or FIGR Tribal Heritage Preservation Officer can evaluate the resource and make

treatment recommendations. Should a significant tribal cultural resource be identified, the Tribal representative and/or FIGR Tribal Heritage Preservation Officer shall prepare a resource mitigation plan and monitoring program to be carried out during all construction activities.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
6. Energy *Would the project:*				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than significant impact. The proposed project would consume energy as part of building operations and transportation activities. Project energy consumption is summarized in Table 12.

Table 12: Project Energy Consumption Estimates

Consumption Activity	Variable	Consumption Rate	Annual Consumption
Building Electricity	25,700 square feet	15.7 kWh/square foot/year	403,490 kWh
Building Natural Gas	25,700 square feet	58.3 cubic-feet/square foot/year	1.50 million cubic feet
Transportation Fuel	2,444,112 vehicle miles traveled	35.1 miles/gallon	69,633 gallons

Notes:
kWh = kilowatt hour
Building electricity and natural gas consumption rates provided by United States Energy Information Administration
Transportation fuel consumption rate provided by National Highway Traffic Safety Administration
Source: FCS, 2019.

Operation of the proposed project would consume an estimated 403,490 kilowatt hours (KWh) of electricity and an estimated 1.50 million cubic feet of natural gas on an annual basis. The proposed project's buildings would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the State's building energy efficiency standards.

These are widely regarded as the most advanced energy efficiency standards and compliance would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary.

Project-related vehicle trips would consume an estimated 69,633 gallons of gasoline and diesel annually. The proposed project is located in an urbanized portion of Cotati near the U.S. 101/SR-116 interchange. As such, it would be in proximity to two regional routes of travel. Furthermore, it is located at the northern portion of the downtown area on Old Redwood Highway. For these reasons, the project would be located in an area readily accessible to motor vehicles and, thus, transportation fuel consumption would not be wasteful, inefficient, or unnecessary. Impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than significant impact. The proposed project would be served with electricity provided by SCP. In 2017, SCP obtained between 45 and 100 percent of its electricity (depending on the program chosen by the customer) from renewable energy sources. This exceeds the State's current objective of 33 percent. Furthermore, the proposed project's buildings would be designed and constructed in accordance with the City latest adopted energy efficiency standards, which are based on the State's building energy efficiency standards. As such, the proposed project would not conflict with State or local renewable or energy efficiency objectives. Impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
7. Geology and Soils *Would the project:*				
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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Evaluation

The analysis in this section is based on a Geotechnical Investigation prepared by PJC & Associates. The report is provided in Appendix D.

Would the project:

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 impact. The nearest faults to the project site are Rodgers Creek Fault, located approximately 3.5 miles to the east, and the San Andreas Fault, located approximately 15 miles to the west. Neither the project site nor the City is located in an identified Alquist-Priolo zone. This condition precludes the possibility of fault rupture. Therefore, no impact would occur.

ii) Strong seismic ground shaking?

Less than significant impact. Hazards associated with earthquakes include surface rupture and ground shaking, and secondary hazards such as liquefaction. Structural damage attributed to earthquakes largely stems from ground shaking. The intensity of ground motion expected at a particular site depends upon the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property. A site may experience greater movement if it is underlain by poorly consolidated material and is within proximity to the causative fault, or as a result of a strong seismic event.

The project site and the surrounding area could experience strong to violent ground shaking as a result of an earthquake on the Rodgers Creek Fault, as well as ground shaking associated with seismic activity on the San Andreas Fault. The intensity of ground shaking would vary with the distance and magnitude of the earthquake that causes the ground shaking. According to Association of Bay Area Governments Hazards maps, Sonoma County has been categorized under the "Very Strong" shaking category.

To address seismic hazards and reduce risk, City General Plan policies require new land development projects to avoid unreasonable exposure to geologic hazards, including earthquakes, subsidence, liquefaction, and expansive soils. The City further requires new development to conduct geotechnical investigations in known geologic hazard areas. A qualified professional must complete an investigation prior to building construction. Based on the investigation's findings, the City reviews the project to ensure compliance with applicable building standards that address particular geologic hazards, such as liquefaction or unstable soils. The State of California has also established minimum standards for safe building design through the California Building Code, which contain specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition.

Because of the proximity to the nearby fault zones and the potential for strong ground shaking, the City would require the project to be designed and constructed in accordance with Section 19100 *et seq*. of the California Health and Safety Code, which requires that structures be designed to resist stresses produced by later forces caused by earthquakes. In addition, compliance with the requirements specified in the California Building Standards Code and the City Municipal Code would reduce impacts to the maximum extent practicable. With implementation of these codes, potential impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact. As discussed in Impact 7(a)(ii), secondary hazards associated with earthquakes include liquefaction. Liquefaction is a seismic phenomenon in which loose, saturated granular and non-plastic, fine-grained soils lose their structure or strength when subjected to high-intensity ground shaking. The phenomenon occurs under three general conditions: shallow groundwater, low-density non-plastic soils, and high-intensity ground motion. The intensity of ground motion at a particular site depends on, among other things, poorly consolidated materials and proximity to the causative fault.

The City General Plan identified and designated areas susceptible to liquefaction throughout the City. In general, the City has very low or moderate risk of liquefaction. However, the City's proximity to active faults increases the likelihood of seismic-related damage. Therefore, development in certain areas of the City may experience some degree of liquefaction. Specifically, the City designated a short stretch of the Laguna de Santa Rosa as "Very High" potential for liquefaction. The City also designated a short stretch of Washoe Creek, located west of U.S. 101 at the edge of the City's Sphere of Influence, as "Very High" potential for liquefaction. The remainder of the City's planning area is designated "Very Low" potential for liquefaction.

To address seismic hazards and reduce risk, City General Plan policies require new land development projects to avoid unreasonable exposure to geologic hazards, including liquefaction. Pursuant to General Plan Policy SA 2.4, the City requires a qualified soils engineer and geologist to review development proposals in areas subject to liquefaction. Based on the City's liquefaction susceptibility map, however, the project site is located in an area with very low potential for liquefaction. The Geotechnical Investigation confirmed that the liquefaction potential was low based on the characteristics of the subsurface conditions.

General Plan policies and actions would further reduce risks and impacts associated with liquefaction. This includes Policy SA 2.2, which requires the City review all new development and construction proposals to ensure conformance with applicable building standards. In addition, Action SA 2h requires enforcement of the Municipal Code to ensure the implementation of measures and standards that will insure compatibility with site-specific geologic conditions. The City's Community Development and Public Works Departments would also evaluate and amend the criteria as necessary. Therefore, impacts would be less than significant.

iv) Landslides?

Less than significant impact. Physical factors such as slope, soil, vegetation, and precipitation influence the potential for landslides. Landslides require a slope, and can occur naturally from seismic activity, excessive saturation, and wildfires, or from unnatural conditions such as construction disturbance, vegetation removal, and excavation among other activities.

The project site is located on generally flat terrain with no steep slopes. Based on the City's landslide potential map, the project is located in area with slopes of less than five percent. Thus, the project site is located in an area with very low potential for landslides. Impacts would be less than significant.

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

Less than significant impact. Based on the City's soil erosion susceptibility map, the project site is located in an area with moderate soil erosion susceptibility. Soil exposed by construction activities during project development could be subject to erosion if exposed to heavy rain, winds, or other storm events. Most of the erosion potential or loss of topsoil would occur during grading and excavation. Grading and ground disturbance increases the potential for accelerated erosion by removing protective vegetation or cover and changing natural drainage patterns.

Projects that disturb one or more acres of soil are required to obtain the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit), issued by the State Water Resources Control Board (State Water Board). The Construction General Permit would require the project to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include project-specific BMPs designed to control drainage and to prevent erosion from reaching storm drains during construction activities. Once operational, the project includes a parking lot and other impervious surfaces not susceptible to erosion. The project also includes landscaping and drainage throughout the site, which would reduce the potential for soil erosion across the project site. Impacts would be less than significant.

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

Less than significant impact. The project site is flat and, thus, this precludes the possibility of landsliding. The Geotechnical Investigation included subsurface borings of the project site, which indicate that it is underlain by artificial fill, weak native soils, and highly expansive soils. The Geotechnical Investigation indicated that standard grading and soil engineering practices and compliance with the California Building Code would abate any potential instability posed by these soils. Impacts would be less than significant.

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

Less than significant impact. The Geotechnical Investigation included subsurface borings of the project site, which indicate that it is underlain by artificial fill, weak native soils, and highly expansive soils. The Geotechnical Investigation indicated that standard grading and soil engineering practices and compliance with the California Building Code would abate any potential expansive hazards posed by these soils. Impacts would be less than significant.

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 impact. The proposed project would be served by the City's sanitary sewer system, which conveys transfers wastewater to the Laguna Treatment Plant. The project does not propose new septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

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

Less than significant impact with mitigation incorporated. Paleontological resources were evaluated in the Cultural Resources Assessment. According to the Cultural Resources Assessment, the Study Area has been identified as an area of high paleontological sensitivity. The Pleistocene and Pliocene units mapped within a 0.5-mile search area of the Study Area have produced significant paleontological resources elsewhere in Sonoma County. The University of California Museum of Paleontology database lists 10 late Pleistocene (Rancholabrean) vertebrate localities in Sonoma County, and 11 vertebrate localities in the Petaluma Formation in Sonoma County, from which a composite of 12 specimens have been collected (refer to Appendix C). Because of the known presence of vertebrate specimens in the County, the likelihood of encountering undiscovered paleontological resources during project implementation is considered high, and the possibility exists that ground-disturbing activities during construction may uncover previously unknown paleontological resources. This would be considered a potentially significant impact. Potential impacts would be reduced to less than significant with implementation of MM GEO-1.

Mitigation Measures

MM GEO-1 A professional paleontologist shall be present during the initial phase of ground disturbance to check for the inadvertent exposure of fossils or other resources of paleontological value. This may be followed by regular periodic or "spot-check" paleontological monitoring during ground disturbance as needed, but full-time monitoring is not required at this time. In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted. The project contractor shall notify a qualified paleontologist to examine the discovery. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards and assess

the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If the Applicant determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the City of Cotati for review and approval prior to implementation, and the Applicant shall adhere to the recommendations in the plan.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
8. Greenhouse Gas Emissions *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Environmental Evaluation

Where available, the significance criteria established by the applicable air quality management or air pollution control district (in this case, the BAAQMD) may be relied upon to make the following determinations.

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than significant impact with mitigation incorporated. Both construction period and operational period activities have the potential to generate GHG emissions. The project would generate GHG emissions during temporary (short-term) construction activities such as site grading, construction equipment engines, on-site heavy-duty construction vehicles, vehicles hauling materials to and from the project site, asphalt paving, and motor vehicles used by the construction workers. On-site construction activities would vary depending on the level of construction activity.

Long-term, operational GHG emissions would result from project generated vehicular traffic, on-site combustion of natural gas, operation of any landscaping equipment, off-site generation of electrical power over the life of the project, the energy required to convey water to and wastewater from the project site, the emissions associated with the hauling and disposal of solid waste from the project site, and any fugitive refrigerants from air conditioning or refrigerators.

The 2017 BAAQMD Thresholds contain the following for GHGs:

> For land use development projects (including residential, commercial, industrial, and public land uses and facilities), the threshold is compliance with a qualified GHG Reduction Strategy; or annual emissions less than 1,100 metric tons per year of carbon dioxide equivalent (CO_2e); or 4.6 metric tons CO_2e/service population/year (residents + employees).

The estimated annual operational emissions were compared with the bright line threshold of 1,100 metric ton (MT) CO_2e per year per year to determine significance for this criterion.

BAAQMD does not presently provide a construction-related GHG generation threshold, but recommends that construction-generated GHGs be quantified and disclosed. BAAQMD also recommends that lead agencies (in this case, the City of Cotati) make a determination of the level of significance of construction-generated GHG emissions in relation to meeting Assembly Bill (AB) 32 GHG reduction goals. Some agencies, including the Sacramento Metropolitan Air Quality Management District (SMAQMD), have adopted 1,100 MT CO_2e/year as a threshold for construction-related GHG emissions (SMAQMD 2015). Since the BAAQMD does not have a construction-related GHG threshold, the SMAQMD construction threshold is used to evaluate the project's construction-related emissions for the purposes of this analysis and consistent with the goals of AB 32.

Construction

The project would emit GHG emissions during construction from the off-road equipment, worker vehicles, and any hauling that may occur. Total GHG emissions generated during all phases of construction were combined and are presented in Table 13. Construction of the project is estimated to generate approximately 505 MT CO_2e over the entire project construction duration, while approximately 360 MT CO_2e would be the maximum amount generated in one calendar year.

Table 13: Construction Greenhouse Gas Emissions

Construction Phase	On-site MT CO_2e/year	Off-site MT CO_2e per year	MT CO_2e per year
2019			
Demolition	21.6	8.7	30.2
Site Preparation	3.3	0.1	3.4
Grading	5.6	31.8	37.4
Building Construction—2019	156.8	132.2	289.0
Total 2019 Construction Emissions	*187.3*	*172.8*	*360.0*
2020			
Building Construction—2020	73.1	61.2	134.3
Paving	7.8	0.5	8.4
Architectural Coating	1.3	0.5	1.8
Total 2020 Construction Emissions	*82.2*	*62.2*	*144.4*
Maximum Annual Construction Emissions			**360**
Threshold of Significance			**1,100**
Does project exceed threshold?			**No**

Notes:
MT CO_2e = metric tons of carbon dioxide equivalent
Totals calculated using unrounded numbers.
Source: CalEEMod and FirstCarbon Solutions (see Appendix A)

As shown in Table 13, project construction-related GHG emissions would not exceed the applicable construction GHG threshold of 1,100 MT CO_2e per year. Therefore, construction-related GHG emission impacts would be less than significant.

Operation

Operational or long-term emissions occur over the life of the project. The major sources for operational GHG emissions include:

- **Motor Vehicles:** These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the project site.
- **Natural Gas:** These emissions refer to the GHG emissions that occur when natural gas is burned on the project site. Natural gas uses could include heating water, space heating, dryers, stoves, or other uses
- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the project.
- **Water Transport:** These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site.
- **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the project.

GHG emissions from energy consumption were calculated using PG&E's energy intensity factors for CO_2, N_2O, and CH_4, and the CalEEMod methodology from Appendix A of the CalEEMod user's manual (California Air Pollution Control Officers Association [CAPCOA] 2016). Full assumptions and detailed modeling results are provided in Attachment A of this IS/MND. Operational GHG emissions by source are shown in Table 14. Operational emissions at project buildout were estimated at 1,659 MT CO_2e.

Table 14: Unmitigated Operational Greenhouse Gas Emissions (2020)

Emission Source	Project Total MT CO_2e per year
Area	<0.01
Energy	423
Mobile (Vehicles)	1,182
Waste	45
Water	9
Total Project Operational Emissions	1,659
BAAQMD Threshold	**1,100**
Does project exceed threshold?	**Yes**

Notes:
MT CO_2e = metric tons of carbon dioxide equivalent.
Totals may not equal due to rounding.
Source of Emissions: CalEEMod Output (see Appendix A)

As shown in Table 14, the project's long-term operational emissions would exceed the BAAQMD's threshold of 1,100 MT CO_2e/year prior to the application of mitigation. Therefore, the project's generation of GHG emissions would be potentially significant without the inclusion of additional mitigation to further reduce project emissions.

There are several options available to mitigate project emissions to the extent required. The project could achieve the equivalent of net zero electricity use through a combination of on-site generation or through the purchase of renewable electricity from the utility provider. The option to purchase 100 percent renewable energy is available in the area through SCP. Achieving net zero electricity use equivalence would reduce emissions by 201 MT CO_2e per year. An additional reduction of 44 MT CO_2e per year could be achieved by implementing a ride-sharing program for the hotel employees.

Table 15 shows the total project operational GHG emissions with the use of renewable electricity and implementation of a ride-sharing program. As shown in Table 15, the GHG operational emissions during operation would continue to exceed BAAQMD's threshold of significance. Therefore, implementation of MM GHG-1 would be required.

Table 15: Mitigated Operational Greenhouse Gas Emissions (2020)

Emission Source	Project Total MT CO_2e per year	Total MT CO_2e per year Reduced Compared to the Unmitigated Scenario (Table 14)
Area	<0.01	0
Energy	222	201
Mobile (Vehicles)	1,138	44
Waste	45	0
Water	9	0
Total Project Operational Emissions	1,415	245
Additional Off-Model Mitigation Through the Purchase of Offsets (MM GHG-1)	(315)	315
Total Project Operational Emissions With the Purchase of Offsets	1,100	559
BAAQMD Threshold	**1,100**	**—**
Does project exceed threshold?	**No**	**—**

Notes:
MT CO_2e = metric tons of carbon dioxide equivalent.
Unrounded results used to calculate totals.
Source of Emissions: CalEEMod Output (see Appendix A)

As shown above, the GHG operational emissions during operation would not exceed BAAQMD's threshold of significance after implementation of MM GHG-1. The impact would be less than significant with mitigation incorporated.

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

Less than significant impact. In July 2016, the Regional Climate Protection Agency (RCPA) adopted the Sonoma County Regional Climate Action Plan, also known as Climate Action 2020 and Beyond, which applied to the County, including the City of Cotati. However, the EIR for the Climate Action Plan was invalidated in 2017 (RCPA 2017). The City adopted Section 5.2 of the Sonoma County Regional Climate Action Plan on March 27, 2018. The Sonoma County Regional Climate Action Plan focuses on relatively short-term actions to reduce emissions by 25 percent below 1990 levels by 2020 to a degree that is beyond current State mandate (AB 32). Section 5.2 of the Sonoma County Regional Climate Action Plan includes the community GHG emissions profile specific to Cotati and the measures that the City of Cotati will implement as part of the regional approach to reducing GHG emissions.

The individual GHG reduction measures that the City has selected and the project's consistency with those measures are shown in Table 16. A project is considered consistent with the Sonoma County Regional Climate Action Plan as long as it implements all mandatory measures that are applicable to the project (RCPA 2016).

Table 16: Project Compliance with Cotati-Selected GHG Measures

Measure	Measure Descriptions/Implementation Information	Project Compliance
State and Regional Measures		
Measure 1-S1: Title 24 Standards for Commercial and Residential Building	The California Building Standards Commission is responsible for adopting and updating Title 24 standards, which then become the default standards for communities throughout the State.	**Consistent.** The project would comply with local building code regarding energy efficiency.
Measure 1-S2: Lighting Efficiency and Toxics Reduction Act (AB 1109)	CEC is responsible for implementing this measure through the prescription of minimum efficiency lighting standards affecting all lighting sold in Sonoma County. Implementation of this measure would be gradual through 2020 as older lighting is replaced with newer, more efficient lighting.	**Consistent.** The project would comply with local building code regarding lighting efficiency.
Measure 2-S1: Renewable Portfolio Standard	The Renewable Portfolio Standard obligates investor-owned utilities, energy service providers, and community choice aggregators to procure an increasing amount of their electricity from eligible renewable sources.	**Consistent.** The project would be served by Sonoma Clean Energy, which provides 45 to 100 percent renewable electricity to its customers.
Measure 2-S2: Solar Water Heaters	This is a voluntary measure that encourages the installation of solar water heating systems.	**Consistent.** This is a voluntary measure to be implemented at the discretion of the project applicant. Solar hot water heaters may be used if the technology is suitable for the needs of the project.

Table 16 (cont.): Project Compliance with Cotati-Selected GHG Measures

Measure	Measure Descriptions/Implementation Information	Project Compliance
Measure 2-R1: Community Choice Aggregation	Participation in SCP is voluntary but is encouraged for all projects. SCP is a community choice aggregation program and electricity provider that works with PG&E to provide their customers with electricity that has a higher renewable energy content.	**Consistent.** The project would be served by SCP for electricity service.
Measure 5-R1: Improve and Increase Transit Service	Sonoma County Transit, Petaluma Transit, and Santa Rosa Transit would be the lead agencies to implement this measure, with assistance from Sonoma County Transportation Authority (SCTA). Each transit agency would determine funding needs and identify service gaps or high-demand routes that could be expanded as part of this measure. The agencies would coordinate with SCTA and the local communities as needed to develop and locate new routes or implement BRT routes.	**Consistent.** The project is located along a transit corridor and its parking lot would continue to be available for park-and-ride use.
Measure 5-R2: Supporting Transit Measures	The purpose of this measure is to increase the use of transit in the county. SCTA, Sonoma County Transit, Petaluma Transit, and Santa Rosa Transit would be the lead agencies to implement this measure. The transit agencies would need to work together to improve efficiency, transfers and service gaps, especially between transit services.	**Consistent**. The project is located along a transit corridor and its parking lot would continue to be available for park-and-ride use.
Measure 5-R3: Sonoma-Marin Area Rail Transit	This measure is applicable to projects project in proximity to a Sonoma-Marin Area Rail Transit (SMART) station or connecting pedestrian and bicycle facilities. A project would be considered consistent with this measure if it is it consistent with any adopted requirements supportive of SMART, including policies and requirements in General Plans, Area Plans, Specific Plans, Station Area Plans, zoning codes, and infrastructure plans.	**Not applicable.** The nearest SMART station is located approximately 1 mile east of the project site.
Measure 5-R4: Trip Reduction Ordinance	SCTA will develop and local jurisdictions will adopt and both will implement a Trip Reduction Ordinance (TRO) requiring employers with 50+ employees to offer one of the following: pre-tax transit expenses, transit or vanpool subsidy, free or low-cost shuttle, or an alternate benefit. The TRO may also consider more ambitious	**Consistent.** The project would have fewer than 50 employees. However, it would be accessible to public transit, bicycles, and pedestrians. Additionally, shuttle service may be provided depending on

Table 16 (cont.): Project Compliance with Cotati-Selected GHG Measures

Measure	Measure Descriptions/Implementation Information	Project Compliance
	recommendations such as specific transportation demand management (TDM) programs offered to all employees, annual monitoring and reporting requirements, or specific trip reduction or mode share target rates. The TRO will also provide a non-trip reduction alternative in the form of purchase of an equivalent amount of GHG offsets for employer.	the needs of the employees and guests.
Measure 5-R5: Supporting Measures for the Transportation Demand Management Program	This measure requires regional and local effort. SCTA staff would develop a TDM program for employers. It is voluntary for individual development projects to include TDM measures.	**Consistent.** The project would be accessible to public transit, bicycles, and pedestrians. Additionally, shuttle service may be provided depending on the needs of the employees and guests.
Measure 9-R1: Waste Diversion Goal	The Sonoma County Waste Management Agency (SCWMA) would be the lead agency for implementing this measure.	**Consistent.** The project would not conflict with implementation of this measure. The project is required to achieve the recycling mandates via compliance with the California Green Building Standards Code (CALGreen).
Measure 11-R1: Countywide Water Conservation Support and Incentives	The Sonoma County Water Agency (SCWA) is responsible for implementing this measure in cooperation with the local communities. SCWA would identify areas where additional conservation would be most effective and develop conservation goals. The local communities would work with SCWA to identify conservation opportunities, and to develop new ordinances or general plan policies pertaining to water conservation.	**Consistent.** The project would comply with all local or regionally adopted water conservation measures.
Measure 13-R2: Wastewater Treatment Equipment Efficiency	RCPA and communities would work with wastewater treatment providers to encourage increased efficiency in wastewater treatment operations.	**Consistent.** Building built as part of the project would support this measure by complying with CALGreen.

Table 16 (cont.): Project Compliance with Cotati-Selected GHG Measures

Measure	Measure Descriptions/Implementation Information	Project Compliance
Local Measures		
Measure 1-L2: Outdoor Lighting	Implementation mechanisms will be chosen by each jurisdiction and may include developing a new ordinance requiring light-emitting diode (LED) outdoor lighting for new development and/or providing incentives for bulb replacement in existing fixtures.	**Consistent.** The project would comply with local LED outdoor lighting requirements.
Measure 1-L3: Shade Tree Planting	The objective of this measure is to expand on current urban tree planting policies and programs to establish a shade tree planting goal for each community to help reduce building energy use.	**Consistent.** The project would comply with local shade tree planning requirements.
Measure 2-L3: Solar in New Non-Residential Buildings	The objective of this measure is to implement a requirement to install solar energy systems on new non-residential development to increase local renewable energy generation. Under this measure, the communities will encourage or require solar installations on as many new non-residential developments as feasible.	**Consistent.** The project would comply with CALGreen provisions for solar ready roofs. The applicant may install solar at a later date.
Measure 4-L1: Mixed-Use Development in City Centers and Along Transit Corridors use	The jurisdictions will identify and support mixed use development in city-centers and transit-oriented development locations through their General Plans, Area Plans, and Specific Plans and zoning codes.	**Consistent.** The project would be consistent with the Cotati General Plan land use designation, Downtown Specific Plan designation, and zoning. This project fits the Northern Gateway designation under the Downtown Specific Plan, which is intended for a variety of retail, restaurants, and entertainment uses. In addition, the project would comply with development standards in the Downtown Specific Plan in order to ensure consistent development in Downtown Cotati.
Measure 4-L3: Supporting Land Use Measures	This measure would encourage new development to provide amenities to support transit and other modes of transportation, including transit stops,	**Consistent.** The project includes the installation of amenities to support alternative modes of

Table 16 (cont.): Project Compliance with Cotati-Selected GHG Measures

Measure	Measure Descriptions/Implementation Information	Project Compliance
	bicycle facilities, good pedestrian networks, car-sharing locations, and electric vehicle (EV) charging stations.	transportation, including bicycle facilities and pedestrian networks in accordance with City standards. The project would not include additional amenities not required by State or local regulations; however, amenities beyond those required by regulations are voluntary.
Measure 5-L4: Supporting Bicycle/Pedestrian Measures	SCTA will work with the cities and county transit agencies to coordinate the identification and implementation of cross-jurisdictional bicycle and pedestrian corridor projects. Each jurisdiction will update municipal codes and prepare or update their bike/pedestrian master plan, as needed. The bike and pedestrian master plans will outline needed improvements and the areas identified for expansion.	**Consistent.** The project would comply with mandatory requirements. The project includes the installation amenities to support alternative modes of transportation, including bicycle facilities and pedestrian networks in accordance with City standards. Amenities beyond those required by regulations are voluntary.
Measure 5-L5: Traffic Calming	Each community will develop a strategy to implement this measure appropriate to their community setting.	**Consistent.** The project would be consistent with adopted traffic calming measures.
Measure 5-L7: Supporting Parking Policy Measures	This measure includes the promotion of prioritized parking for hybrid/EV cars, carpools, vanpools at city-centered corridors, new developments, public parking areas, and municipal facilities. Participating jurisdictions may consider amending zoning code to require new parking lots to provide prioritized parking for carpools, vanpools, hybrids, and EVs, and provide charging facilities and/or incentives.	**Consistent.** The project would comply with mandatory requirements. The project would comply with all mandatory parking policy measures.
Measure 7-L1: Electric Vehicle Charging Station Program	This is a voluntary measure. A project would be consistent with this voluntary measure if the project would include EV charging stations and/or EV-ready infrastructure.	**Consistent.** The project would comply with electrical vehicle charging requirements of the CalGreen Code.

Table 16 (cont.): Project Compliance with Cotati-Selected GHG Measures

Measure	Measure Descriptions/Implementation Information	Project Compliance
Measure 7-L2: Electrify Construction Equipment	Participating jurisdictions would adopt an ordinance that reduces gasoline-powered landscaping equipment use and/or reduces the number and operating time of such equipment. New development would be required to provide adequate amount and location of electrical outlets to allow use of electrical landscaping equipment. New development would also be also required to prepare landscaping plans that commit to any jurisdictional targets for use of alternatively fueled or electric landscape equipment goals.	**Consistent.** The project would comply with adopted requirements for electrified landscaping equipment.
Measure 8-L1: Idling Ordinance	Participating jurisdictions will adopt new ordinances that limit idling for commercial vehicles to no more than 3 minutes.	**Consistent.** Commercial vehicles accessing the project site during construction and operations would be subject to adopted requirements for idling limits.
Measure 11-L1: Senate Bill (SB) X7-7—Water Conservation Act of 2009	This statute requires urban water agencies throughout California to increase conservation to achieve a Statewide goal of a 20 percent reduction in urban per-capita use (compared to nominal 2005 levels) by December 31, 2020 (referred to as the "20 X 2020 goal"). Each urban water retailer in the county subject to the law has established a 2020 per-capita urban water use target (in terms of gallons per capita per day) to meet this goal. Specific per-capita water use reduction goals vary by water agency.	**Consistent.** The project would comply with all local or regionally adopted water conservations to implement the requirements of SB X7-7.
Source of measures, measure descriptions, and implementation information: RCPA 2016.		

As noted in Table 16, the project would be consistent with the measures adopted by the City of Cotati in the Sonoma County Regional Climate Action Plan. The project would comply with CALGreen, including requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, and other measures that will reduce GHG emissions. Motor vehicle emissions associated with the project would be reduced through compliance with mandatory State regulations on fuel efficiency and fuel carbon content. Emissions related to project electricity consumption would be reduced as the electric

utility, PG&E, is required to comply with the Renewable Portfolio Standard, which requires utilities to increase its mix of renewable energy sources to 33 percent by 2020.

Therefore, the project would not conflict with any applicable plan, policy, or regulation adopted to reduce GHG emissions. The impact would be less than significant.

Mitigation Measures

MM GHG-1 Prior to issuance of the certificate of occupancy, the applicant shall provide documentation to the City of Cotati demonstrating that the project would achieve additional annual GHG emission reductions totaling 559 MT CO_2e through any combination of the following measures or other measures approved by the City:

- Purchase electricity from Sonoma Clean Energy.
- Install on-site solar panels to generate electricity for a portion of project electricity consumption.
- Install on-site charging units for electric vehicles consistent with parking requirements in California Green Building Standards Code Section 5.106.5.2
- Provide a plan documenting how a ride sharing program for hotel employees would be implemented starting no later than 60 days after project operations begin.
- Purchase voluntary carbon credits from a verified GHG emissions credit broker in an amount sufficient to offset operational GHG emissions of approximately 559 MT CO_2e per year over the lifetime of the project (or a reduced amount estimated based on implementation of other measures listed above). Copies of the contract(s) shall be provided to the City planning department.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
9. Hazards and Hazardous Materials *Would the project:*				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

Less than significant impact. The Department of Toxic Substance Control (DTSC) is responsible for hazards within the State of California. The DTSC works along with the EPA to enforce and implement hazardous material laws and regulations. The EPA, Caltrans, and Occupational Safety

and Health Administration all administer federal laws, regulations, and requirements that deal with hazardous waste.

Commercial developments typically do not involve the regular use, storage, transport, or disposal of significant amounts of hazardous materials. Project construction and operations would involve the minor routine transport and handling of minimal quantities of hazardous substances such as diesel fuels, lubricants, solvents, cleaning supplies, asphalt, pesticides, and fertilizers. Handling and transporting of these materials could result in the exposure of workers and residents to hazardous materials.

During construction, hazardous materials such as diesel fuel and lubricants for construction equipment would be used on site. Once operational, the hotel would use light caustic solutions and other similar product for routine facility maintenance and cleaning. However, the project would not create a substantial hazard to the public or the environment, because project construction and operation would comply with applicable federal, State, and local laws pertaining to the safe handling and transport of hazardous materials. Chemicals would be stored on site in a chemical room, and the generator would be subject to applicable regulations. Any transportation of such materials would comply with applicable regulations and policies that deal with hazardous materials. Impacts would be less than significant.

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?

Less than significant impact. Older buildings typically contain asbestos and lead-based paints that may create a hazard when disturbed by construction activities. The site contains no structures or buildings, and thus, the presence of asbestos-containing materials and lead-based paints on site is highly unlikely. Demolition of the existing parking lot would not release asbestos or lead into the local environment and would not create a potential impact. In addition, based on Statewide information, the project site does not contain serpentine or ultramafic rocks, which contain asbestos fibers. Therefore, the potential for release of naturally occurring asbestos during construction activities is considered low.

As described previously, the proposed project would involve the minor use of hazardous materials typically required during construction, such as diesel fuel and other motor lubricants. Contractors would comply with applicable federal, State, and local laws pertaining to the safe handling and transport of hazardous materials, which would minimize potential spill occurrences. Spills that may occur during construction activities would likely be minimal and potential adverse effects would be localized. Plans and specifications typically require contractors to clean up immediately any spills of hazardous materials.

Land uses such as hotels and restaurants typically store and use certain chemicals on site. This may include solvents and other cleaning chemicals for operations, as well as fertilizers and pesticides for landscaping purposes. However, the project would be required to store chemicals in compliance with applicable regulations and policies that deal with hazardous materials.

Impacts would be less than significant.

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 impact. The Rainbow Bridge Montessori School, a private elementary school, is located approximately 0.30 mile to the south of the project site. However, as described above, construction activities and project operations would involve minor routine use of hazardous substances such as diesel fuels, cleaning agents, pesticides, and fertilizers. The use of these substances would be confined to the project site and likely in small quantities. Furthermore, any potential to emit hazardous materials would be confined to the project site and unlikely to reach the school. No impact would occur.

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?

Less than significant impact. The project site once supported a commercial gas station and employed three underground storage tanks (USTs). The USTs were removed in 1993. Groundwater monitoring wells were installed. The County of Sonoma Department of Health Services issued a closure letter on December 16, 2010 confirming that no further action was required. Thus, the project site has been remediated to the satisfaction of the regulatory with jurisdiction over the former USTs. As such, the past presence of the USTs does not pose a hazard to the public or environment.

As described under Impact 8(a), the project site does not contain known, or propose to store, hazardous materials in substantial quantities on site. A search of federal, State, and local databases that maintain information regarding hazardous material sites do not indicate the presence of hazardous materials.

The DTSC maintains a Statewide database, EnviroStor, which maps the location of hazardous waste sites. The DTSC database includes historical information on land uses and detailed efforts undertaken to remediate sites contaminated with known hazardous materials. The database includes sites currently undergoing remediation and sites that require cleanup. Results from a database search did not identify any listed properties within 1,500 feet of the project site.

In addition, the State Water Board maintains another Statewide database, GeoTracker. The database identifies sites that contain or once contained USTs. In addition, the database provides information on the status of remedial and cleanup activities. The database further indicates whether the State Water Board closed the case file upon completing site cleanup activities. A search of the GeoTracker database identified four properties within 1,000 feet of the project site, which are described below.

- **Shell Service Station:** Located at 7675 Old Redwood Highway approximately 100 feet north of the project site. It is listed as an active site under the Leaking Underground Storage Tank (LUST) program and is undergoing remediation. Site investigations began in 1989 and four USTs were removed in 2001. Groundwater extraction was performed from 2006 through 2008 and excavation occurred in 2009.

- **Chevron Station:** Located at 7716 Old Redwood Highway approximately 200 feet northeast of the project site. It is listed as an active site under the LUST program and is undergoing a site assessment. In 1999, four USTs were removed. In 2000, approximately 2,200-cubic-yards of contaminated soil was excavated from the site and disposed. Investigations have taken place from 1999 through 2007.
- **Cotati Corporation Yard:** Located at 100 Gravenstein Way approximately 300 feet east of the project site. It is listed as a cleanup site. Cleanup activities were completed and the case file was closed on August 18, 1993.
- **Andreoli Property:** Located at 7883 Old Redwood Highway approximately 500 feet south of the project site. It was listed as a cleanup site. Cleanup activities were completed and the case file was closed on May 12, 1998.

Based on this information, the project would not create a significant hazard risk to the environment or the public; therefore, impacts are less than significant.

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

No impact. There are no public or public use airports in the City of Cotati. The nearest public airport to the project site is the Petaluma Municipal Airport, approximately 8 miles south of the project site. A larger regional airport, the Charles M. Schultz-Sonoma County Airport is located approximately 15.5 miles north of the project site. The project site is not within the Airport Influence Area for either airport. These distances preclude the possibility of the project creating safety hazards for persons visiting or working on the project site. No impact would occur.

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

No impact. The project would not modify any existing roadways in a way that would impede emergency access or evacuation. The project proposes to remove an existing surface parking lot and construct a hotel along Gravenstein Highway and Old Redwood Highway. Vehicular access would be taken from St. Joseph Way. An emergency vehicle access, which is subject to approval by Caltrans, is proposed onto Gravenstein Highway. Additionally, a future roadway connection to Old Redwood Highway would provide a third route for emergency access.

The project is located at the intersection of two major roadways, which provide vehicular access to U.S. 101 and SR-116. In addition, the aforementioned emergency vehicle access would be provided onto Gravenstein Highway. Response vehicles and evacuees would likely use these routes in the event of an emergency. Any temporary roadway closures required during construction would be subject to City review and approval, which ensures consistency with local emergency requirements.

Finally, the project would install a U-turn pocket and associated striping and signage on southbound Old Redwood Highway to improve egress. This would have no detrimental effects on emergency

responses or emergency evacuation, as it simply would provide an additional permitted turning movement at this location.

Therefore, the project would have no impact on emergency responses or emergency evacuation plans.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than significant impact. The combination of highly flammable vegetation, long, dry summers, and steep slopes create a risk for wildfires within the County. Large, damaging fires can happen in urban areas, which depend on weather conditions and the spread of wildland fires in surrounding areas. For example, human activities or facilities have caused ninety-seven percent of wildland fires since 1989.

The project is located in an urban area, with urban development to the east and U.S. 101 to the west. The project site is adjacent to a baseball field within a larger vacant area to the south and relatively sparse development to the west. These land use types typically are not associated with wildland fires and usually preclude the possibility of exposure to such threats. Furthermore, the City is not located in a high fire zone delineated by California Department of Forestry and Fire Protection (CALFIRE). However, recent wildfire events in Sonoma County have demonstrated that even urban areas are vulnerable to wildfires, particularly those within the Wildland-Urban Interface.

As a condition of approval, the project would comply with the latest adopted edition of the California Building and Fire Codes. The codes are designed to reduce potential fire hazards. Access to the project site also would be designed to facilitate the arrival of emergency vehicles and evacuation, if necessary. Compliance with the City's adopted building and fire codes and street standards would reduce potential impacts from wildfires to less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
10. Hydrology and Water Quality *Would the project:*				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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:				
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
(iii) 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	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than significant impact. The City of Cotati is located in the Russian River watershed, which includes much of Sonoma and Mendocino counties. The Laguna de Santa Rosa is located in the project vicinity. Construction of the project would require grading and construction activities, which

could allow surface water to carry sediment and small quantities of pollutants (e.g., oil or fuel used in construction equipment) off-site, thereby potentially degrading local water quality.

The City's stormwater system is covered under a National Pollutant Discharge Elimination System (NPDES) Phase I Municipal Separate Storm Sewer Systems (MS4) permit, which requires both mitigation of stormwater quality and quantity. Furthermore, the Santa Rosa Storm Water Low Impact Development (LID) Technical Design Manual (LID Manual) provides guidance for post construction measures. Implementation of BMPs as required by NPDES permit C.3 requirements, LID Manual requirements, and policies and actions discussed in the Cotati General Plan would ensure impacts would be less than significant.

Projects that disturb one or more acres of soil are required to obtain the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit), issued by the State Water Board. The Construction General Permit requires the project to prepare and implement a SWPPP. As a condition of project approval, the applicant will be required to prepare a SWPPP. The SWPPP will include project-specific BMPs that are designed to control drainage and to prevent erosion from reaching storm drains during construction activities.

Once operational, the project includes a parking lot and other impervious surfaces, which could convey stormwater runoff that could degrade water quality. The project includes landscaping and drainage throughout the site, which will reduce the potential for soil erosion across the project site. Implementation of BMPs such as bioretention basins would ensure no substantial impact would occur. Therefore, impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than significant impact. The City of Cotati obtains water from the Russian River, by the water rights held by the SCWA, for most of its water supply, and uses local groundwater to supplement water demand during peak periods and droughts. No wells would be drilled to supply water for the project; therefore, the project would not affect local aquifers.

The site currently contains a park-and-ride surface parking area and a paved area that previously supported commercial structures. The proposed project would increase impervious surfaces, thus reducing the potential recharge area from existing conditions. Stormwater would be routed and collected in the stormwater drainage system and would to percolate into the soil as it is impounded in the bioretention basins. Furthermore, landscaping and open spaces are proposed along the perimeter of the project site and within the parking area, thereby allowing for groundwater recharge. As such, the impacts would be less than significant.

c) Substantially alter the existing drainage pattern of 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:

(i) result in substantial erosion or siltation on- or off-site;

Less than significant impact. The project site currently contains a park-and-ride surface parking area and a paved area that previously supported commercial structures. The proposed project would increase impervious surface coverage and, therefore, have the potential to increase runoff. The proposed Project would be required to comply with applicable North Coast RWQCB regulations and the City's regulatory policies pertaining to stormwater runoff. In addition, as part of the Downtown Specific Plan, the project would be required to implement LID strategies that would minimize impervious surfaces and pollutant loads.

The proposed project would install a storm drainage system consisting of bioswales, inlets, underground piping, and basins that would capture and detain runoff during storm events and meter its release at a rate no greater than the predevelopment condition of the project site into downstream waterways such that erosion and siltation do not occur. This would also avoid any changes to the existing downstream drainage facilities. Impacts would be less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less than significant impact. The project site currently contains a park-and-ride surface parking area and a paved area that previously supported commercial structures. The proposed project would increase impervious surface coverage and, therefore, have the potential to increase runoff.

The proposed project would install a storm drainage system consisting of bioswales, inlets, underground piping, and basins that would capture and detain runoff during storm events and meter its release at a rate no greater than the predevelopment condition of the project site into downstream waterways such that flooding does not occur. Impacts would be less than significant.

(iii) 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

Less than significant impact. The proposed project would increase impervious surface coverage and, therefore, have the potential to increase runoff. The proposed project would install a storm drainage system consisting of bioswales, inlets, underground piping, and basins that would capture and detain runoff during storm events and meter its release at a rate no greater than the predevelopment condition of the project site into downstream waterways such that it does not exceed the capacity of the receiving body or provide substantial sources of polluted runoff. Impacts would be less than significant.

(iv) impede or redirect flood flows?

No impact. Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Number 06097C0879E indicates that the proposed project site is located in an area with 0.2 percent annual chance flood hazard (500-year flood hazard area). No structure would be placed within an identified 100-year flood hazard area and would not substantially alter flood flows. No impact would occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No impact. As discussed in Impact 10(c) (iv), the project site is not located within a 100-year flood zone. There are no lakes or reservoirs in the vicinity, which precludes the possibility of seiches. The project site is more than 15 miles from the Pacific Ocean, which precludes the possibility of tsunami inundation. The project site is located in a flat area, which precludes the possibility of mudflows. No impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than significant impact. As discussed in Impact 10(b) and (c), the proposed project would not involve the drilling of new groundwater wells and would install a storm drainage system that would employ bioretention to sequester pollutants. Impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
11. Land Use and Planning *Would the project:*				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

a) Physically divide an established community?

No impact. The City of Cotati encompasses 1,220 acres within its limits. The project site is within the City limits and is bounded on the west by a U.S. 101 northbound off-ramp, on the north by Gravenstein Highway, on the east by Old Redwood Highway, and on the south by property owned by Oliver's Business Properties, LLC. Existing land uses in the surrounding area include general commercial uses to the north and south, general commercial and medium-density housing to the east, and general commercial and low/medium density housing to the west across U.S. 101.

The physical division of an established community would occur if construction of a large linear feature such as a railroad or interstate highway occurred or removal of access that would impact mobility such as a bridge. The project would be consistent with the Cotati General Plan land use designation, zoning, and Downtown Specific Plan standards. The project does not propose the type of development or infrastructure that would significantly divide an established community, such as an interstate highway. As a result, no impact on established communities would occur.

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?

Less than significant. The project site is designated as SP—Specific Plan in the General Plan Land Use Designation Map and is located within the Downtown Specific Plan area. The Downtown Specific Plan is intended to implement the Land Use and Urban Design Elements of the Cotati General Plan by providing standards for the enhancement of the Downtown and adjacent areas, including standards related to the form and character of buildings such as setbacks, materials, and landscaping. The Downtown Specific Plan is divided into four districts: Commerce Avenue, Northern Gateway, La Plaza Park, and Historic Core. Within the Downtown Specific Plan, the project site is a part of the NG district, which is intended for a new mixed-use core that accommodates a wide variety of retail, restaurant, and entertainment uses.

The project would be consistent with the Cotati General Plan land use designation, Downtown Specific Plan designation, and zoning. This project proposes a four-story hotel and Market Hall. This type of development fits the Northern Gateway designation under the Downtown Specific Plan, which is intended for a variety of retail, restaurants, and entertainment uses. In addition, the project would comply with development standards in the Downtown Specific Plan in order to ensure consistent development in Downtown Cotati. The Downtown Specific Plan establishes a maximum dwelling unit count of 229, maximum net new commercial square footage of 237,050 square feet, and the maximum height allowance in the Northern Gateway District is 50 feet. The project would not exceed these maximum build out numbers, because the total square footage of commercial uses is 25,700, far less than 237,050 square feet identified in the Downtown Specific Plan. The height of the hotel is proposed at 53-feet at the parapet, with another 5 feet to the top of the stairwells. A variance for height will be required for the project to obtain approvals.

The Downtown Specific Plan EIR evaluated the potential environmental impacts of the Downtown Specific Plan, including the subject project, and it concluded that its environmental impacts would be less than significant with mitigation, except for significant unavoidable impacts on historic buildings. However, no historic buildings exist on the project site, so no impacts related to this issue would occur. As the project would comply with the Downtown Specific Plan, it is not expected to conflict with any City policies or ordinances adopted to avoid or mitigate an environmental effect. As a result, impacts would be less than significant.

Traffic Noise Land Use Compatibility Impacts

The City of Cotati addresses noise land use compatibility in the Noise chapter of its General Plan (City of Cotati 2015). These guidelines reflect the levels of noise exposure that are generally considered to be compatible with various types of land use development. The land use categories listed in the City's Land Use Compatibility for Community Noise Environment guidelines that most closely apply to the proposed project are Multi-Family Residential, Hotels, and Motels; and Office Buildings, Business Commercial, and Professional.

Under the Multi-Family Residential, Hotels, and Motels designation, noise environments with ambient noise levels of up to 65 A-weighted decibel (dBA) day/night average sound level (L_{dn}) are considered "normally acceptable" for this type of new land use development. While noise environments with ambient noise levels ranging from 65 dBA to 75 dBA L_{dn} are considered "conditionally acceptable" for this type of land use development; under this classification, the specified land use may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features have been included in the design. However, noise environments with ambient noise levels in excess of 75 dBA L_{dn} are considered "unacceptable" for this type of land use development.

Under the Office Buildings, Business Commercial, and Professional designation, noise environments with ambient noise levels of up to 67.5 dBA L_{dn} are considered "normally acceptable" for this type of new land use development. While noise environments with ambient noise levels ranging from 67.5 dBA to 77.5 dBA L_{dn} are considered "conditionally acceptable" for this type of land use development; under this classification, the specified land use may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features have been included in the

design. However, noise environments with ambient noise levels in excess of 77.5 dBA L_{dn} are considered "unacceptable" for this type of land use development.

In addition to exterior noise compatibility standards, the City has also established interior noise level standards. According to the City's noise policies, new developments shall not expose indoor sleeping areas to noise levels in excess of 45 dBA L_{dn}.

For a discussion of the characteristics of noise and further information regarding the applicable noise regulatory framework, refer to the Noise impact discussion in Section 13, Noise, of this document.

A significant impact would occur if persons working or residing at the proposed project site would be exposed to transportation noise levels that would exceed:

- The City's normally acceptable land use compatibility threshold of 65 dBA L_{dn} for the proposed Multi-Family Residential, Hotels, and Motels land use development; or
- The City's normally acceptable land use compatibility threshold of 67.5 dBA L_{dn} for the proposed Office Buildings, Business Commercial, and Professional land use development; or
- The City's interior noise level standard of 45 dBA L_{dn} for indoor sleeping areas.

The Federal Highway Administration (FHWA) highway traffic noise prediction model (FHWA RD-77-108) was used to evaluate existing and cumulative traffic noise conditions in the vicinity of the project site. The projected traffic noise levels along roadways adjacent to the project site were analyzed to determine compliance with the City's land use compatibility standards. The daily traffic volumes were obtained from the traffic analysis prepared for the project by TJKM Transportation Consultants (2018). The resultant noise levels were weighed and summed over a 24-hour period in order to determine the L_{dn} values. The traffic noise modeling input and output files are included in Appendix E of this document. Table 17 shows a summary of the traffic noise levels for existing without project, existing plus project, cumulative without project, and cumulative plus project conditions as measured at 50 feet from the centerline of the outermost travel lane.

Table 17: Traffic Noise Model Results Summary

Roadway Segment	Existing + No Project (dBA) L_{dn}	Existing + Project (dBA) L_{dn}	Increase over Existing + No Project (dBA)	Cumulative + No Project (dBA) L_{dn}	Cumulative + Project (dBA) L_{dn}	Increase over Cumulative + No Project (dBA)
SR-116—U.S. 101 SB Off-Ramp to Old Redwood Highway	62.2	62.2	0.0	63.8	63.9	0.1
Old Redwood Highway—SR-116 to Saint Joseph Way	61.7	61.9	0.2	65.2	65.3	0.1
Old Redwood Highway—Saint Joseph Way to Parking Lot Driveway	63.8	63.9	0.1	65.1	65.2	0.1

Table 17 (cont.): Traffic Noise Model Results Summary

Roadway Segment	Existing + No Project (dBA) L_{dn}	Existing + Project (dBA) L_{dn}	Increase over Existing + No Project (dBA)	Cumulative + No Project (dBA) L_{dn}	Cumulative + Project (dBA) L_{dn}	Increase over Cumulative + No Project (dBA)
U.S. 101—South of SR-116	78.3	78.3	0.0	78.3	78.3	0.0
Source: FirstCarbon Solutions 2018.						

The traffic noise model results show that projected traffic noise levels along the Old Redwood Highway, between SR-116 and Saint Joseph Way, would range up to 65.3 dBA L_{dn} as measured at 50 feet from the centerline of the outermost travel lane under cumulative plus project conditions. The nearest proposed structure to this roadway segment is the proposed retail commercial building. These noise levels are within the City's normally acceptable range of up to 67.5 dBA L_{dn} for new commercial land use developments. The façade of the proposed hotel would be located approximately 195 feet from the centerline of Old Redwood Highway. At this distance, noise levels from traffic on Old Redwood Highway would attenuate to below 56 dBA L_{dn}. These noise levels are within the City's normally acceptable range of 65 dBA L_{dn} for new hotels.

For the proposed outdoor courtyard area, traffic noise levels from all surrounding roadways would attenuate to below 65 dBA L_{dn}, assuming a direct line of sight and no reductions for shielding provided by proposed structures. Therefore, these noise levels are within the City's normally acceptable range land uses associated with new hotels.

The traffic noise model results show that projected traffic noise levels along U.S. 101, south of SR-116, would range up to 78.3 dBA L_{dn} as measured at 50 feet from the centerline of the outermost travel lane under all of the modeled scenarios. The proposed hotel building would be setback approximately 320 feet from the centerline of this roadway segment. At this distance, noise levels would range up to approximately 67.5 dBA L_{dn} at the façade of the building with a direct line of sight to U.S. 101. These noise levels are within the City's conditionally acceptable range of 65 dBA to 75 dBA L_{dn} for new Multi-Family Residential, Hotels, and Motels land use developments.

Based on the EPA's Protective Noise Levels (EPA 1978), with a combination of walls, doors, and windows, standard construction in accordance with building code requirements for transient lodging developments would provide 25 dBA in exterior-to-interior noise reduction with windows closed and 15 dBA or more with windows open. With windows open, the interior noise levels of the proposed units nearest to U.S. Route 101 would not meet the City's interior noise standard of 45 dBA L_{dn} for indoor sleeping areas (i.e., 67.5 dBA–15 dBA = 52.5 dBA). However, with implementation of the proposed air conditioning system that would allow windows to remain closed for prolonged periods would be sufficient to reduce traffic noise levels to meet the interior noise level standard of 45 dBA L_{dn} (i.e., 67.5 dBA–25 dBA = 42.5 dBA). Therefore, the proposed project would not result in a conflict

with the City's noise land use compatibility standards, which would represent a less than significant impact. No mitigation would be required.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
12. Mineral Resources *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

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

No impact. The Surface Mining and Reclamation Act of 1975 (SMARA) is the primary State law concerning mineral resources, including sand, gravel, and building stone which are important for commercial purposes. Because of the economic importance of mineral resources, SMARA limits new development in areas with significant mineral deposits. SMARA also requires State Geologists to classify specified areas into Mineral Resource Zones (MRZs).

The Sonoma County Mineral Land Classification Map has classified the project site in either MRZ-1 or MRZ-4, defined as areas that indicate that no significant mineral deposits exist or the information is inadequate for assignment to any other MRZ zone. Therefore, implementation of the project would not result in the loss of availability of a known resource that would be of value to the region and the residents of the State. No impact would occur.

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

No impact. The project site is located on a vacant lot in a developed area of the City of Cotati, with surrounding mixed-use developments that include commercial activities and residential units. The Cotati General Plan and the City of Cotati Downtown Specific Plan do not designate any mineral recovery sites near the project site. There are no known mineral deposits and no active mineral extraction sites on the project site or in the immediate vicinity. As such, the project would not result in the loss of availability of a locally important mineral recovery site. No impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
13. Noise *Would the project result in:*				
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?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

According to CEQA Guidelines updated Appendix G, to determine whether impacts related to noise and vibration are significant environmental effects, the above questions are analyzed and evaluated. However, the noise land use compatibility discussion is now discussed within the Land Use and Planning discussion (Section 11, Land Use and Planning, Impact 11(b) of this document.

Supporting noise information is provided in Appendix E.

Environmental Evaluation

Would the project result in:

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?

Less than significant impact with mitigation incorporated. This impact evaluates short-term construction noise, traffic noise, and operational/stationary noise.

Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with

each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The standard unit of measurement of the loudness of sound is the decibel (dB). The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments. While a change of 5 dBA is considered to be the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the A-weighted decibel scale (dBA) was derived to relate noise to the sensitivity of humans, it gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for a number of various sound level metrics, including the L_{dn} and the Community Noise Equivalent Level (CNEL), both of which represent how humans are more sensitive to sound at night. In addition, the equivalent continuous sound level (L_{eq}) is the average sound energy of time-varying noise over a sample period and the L_{max} is the maximum instantaneous noise level occurring over a sample period.

Short Term Construction Impacts

A significant impact would occur if construction activities would result in generation of a substantial temporary increase in ambient noise levels outside of the permissible hours for construction established in the City's Municipal Code that would result in annoyance or sleep disturbance of nearby sensitive receptors. The City's Municipal Code limits noise producing construction activities to the hours between 7:00 a.m. and 7:00 p.m. on weekdays; and 9:00 a.m. and 5:00 p.m. on Saturdays, Sundays, or on holidays if permitted by the reviewing authority through conditions of approval.

Noise impacts from construction activities associated with the project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. Two types of short-term noise impacts would occur during site preparation and project construction. The first type would result from the increase in traffic flow on local streets, associated with the transport of workers, equipment, and materials to and from the project site. The transport of workers and construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. Because workers and construction equipment would use existing routes, noise from passing trucks would be similar to existing vehicle-generated noise on these local roadways. For this reason, short-term intermittent noise from trucks would be minor when averaged over a longer time-period and would not be expected to exceed existing peak noise levels in the project vicinity. Therefore, short-term construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction noise levels are rarely steady in nature and, often, fluctuate depending on the type and number of equipment being used at any given time. In addition, there could be times where large equipment is not operating and noise would be at or near normal ambient levels.

Construction is completed in discrete steps, each of which has its own mix of equipment and its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site would change as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction related noise ranges to be categorized by work phase.

The site preparation phase, which includes excavation and grading activities, tend to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery and compacting equipment, such as bulldozers, draglines, backhoes, front loaders, roller compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 or 4 minutes at lower power settings.

Construction of the proposed project is expected to require the use of scrapers, bulldozers, water trucks, haul trucks, and pickup trucks. The maximum noise level generated by each scraper is assumed to be 85 dBA L_{max} at 50 feet from this equipment. Each bulldozer would also generate 85 dBA L_{max} at 50 feet. The maximum noise level generated by graders is approximately 85 dBA L_{max} at 50 feet. Each doubling of sound sources with equal strength increases the noise level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, a reasonable worst-case combined noise level during this phase of construction would be 90 dBA L_{max} at a distance of 50 feet from the acoustic center of a construction area. This would result in a reasonable worst-case hourly average of 86 dBA L_{eq}. The acoustic center reference is used because construction equipment must operate at some distance from one another on a project site, and the combined noise level as measured at a point equidistant from the sources would be the worst-case maximum noise level.

Noise-sensitive receptors typically refer to land uses that are generally more sensitive to noise including, but are not limited to, residences, schools, libraries, hospitals, and churches. The closest noise-sensitive receptor to the project site is a single-family residential home located east of the project site on Gravenstein Way. This receptor would be located approximately 360 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would operate simultaneously at the project site. At this distance, worst-case construction noise levels could range up to approximately 73 dBA L_{max}, intermittently, and could have an hourly average of up to 69 dBA L_{eq}, at the façade of the nearest single-family residential home.

However, compliance with the permissible construction hours established by the City's Municipal Code would reduce the effects of noise produced by construction activities on longer-term (hourly or daily) ambient noise levels, and it would reduce potential impacts that could result in annoyance or sleep disturbances at nearby sensitive receptors. The City's Municipal Code limits noise producing construction activities to the hours between 7:00 a.m. and 7:00 p.m. on weekdays; and 9:00 a.m. and 5:00 p.m. on Saturdays, Sundays, or on holidays if permitted by the reviewing authority through conditions of approval. The project is located within the City's Downtown Specific Plan Area, and therefore, the project must comply with MM NOI-1 of the City of Cotati Downtown Specific Plan EIR, requiring implementation of best management noise reduction techniques and practices.

Compliance with this mitigation measure, as modified to reflect the latest best management practice noise reduction techniques, would reduce construction noise impacts to less than significant.

Therefore, restricting construction activities to the City's permissible time-periods and implementing the best management noise reduction techniques and practices outlined in MM NOI-1, would ensure that construction noise levels would not expose persons to noise levels in excess of established standards. Therefore, the potential short-term construction noise impacts on sensitive receptors in the project vicinity would be reduced to a less than significant level.

Operational/Stationary Source Noise Impacts

Less than significant impact. A significant impact would occur if operational noise levels generated by stationary noise sources at the project site would result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of the City's noise performance thresholds. According to the City's standard for Maximum Allowable Noise Levels by Receiving Land Use, no use, activity, or process within the city shall generate noise levels exceeding 65 dBA L_{dn} at any receiving residential land use; or 75 L_{dn} at any receiving office land use.

Additionally, no use, activity, or process within the city shall generate noise levels exceeding the following levels, as measured at the property line of any residential land use:

- 50 dBA L_{eq} (hourly) or 70 dBA L_{max} between the hours of 7 a.m. and 10 p.m.; or
- 45 dBA L_{eq} (hourly) or 65 dBA L_{max} between the hours of 10 p.m. and 7 a.m.

The proposed project would include new stationary noise sources associated with the proposed hotel and commercial land uses as the loudest of these noise sources include parking lot activities and mechanical ventilation system equipment. The Market Hall would occasionally have live music, fundraisers, or farmers' markets. These would be potential point sources of noise that could affect noise-sensitive receptors in the project vicinity.

Parking Lot Activities

Customer and employee parking activities include vehicles cruising at slow speeds, doors shutting, or cars starting, would generate noise levels of approximately 60 dBA to 70 dBA L_{max} at 50 feet. Conversation between two persons at a distance of 3 to 5 feet apart would generate a noise level of 60 dBA L_{eq} at 5 feet, or approximately 40 dBA L_{eq} as measured at 50 feet.

The nearest sensitive receptor to the proposed parking areas is the single-family residence located east of the project site on Gravenstein Way. This receptor is located approximately 550 feet from the proposed parking areas on the project site. At this distance, noise levels from parking lot activities would attenuate to below 50 dBA L_{max} at the property line of this residential receptor. These noise levels are below the City's maximum nighttime noise performance threshold for a receiving residential land use of 65 dBA L_{max}. In addition, these parking lot activities would be expected to occur sporadically throughout the day, as customers and employees arrive and leave the parking lot areas. As a result, when averaged over a period of time, these noise levels would not exceed the City's nighttime hourly thresholds of 45 dBA L_{eq} or the daily average noise performance threshold of

65 dBA L_{dn}. Therefore, the impact of noise produced by project-related parking lot activities to sensitive off-site receptors would be less than significant.

Mechanical Equipment Operations

At the time of preparation of this analysis, details were not available pertaining to proposed rooftop mechanical ventilation systems for the project; therefore, a reference noise level for typical rooftop mechanical ventilation systems was used for this analysis. Noise levels from typical rooftop mechanical ventilation equipment are anticipated to range up to approximately 60 dBA L_{eq} at a distance of 25 feet.

Proposed rooftop mechanical ventilation systems at the project site could be located as close as 350 feet from the nearest noise-sensitive receptor which is the single-family residence located east of the project site on Gravenstein Way. At this distance, noise levels generated by this equipment would attenuate to below 37 dBA L_{eq} at the property line of this closest noise-sensitive receptor. These noise levels are below the City's maximum nighttime noise performance threshold for a receiving residential land use of 65 dBA L_{max}. Additionally, these noise levels would not exceed the City's nighttime hourly thresholds of 45 dBA L_{eq} or the daily average noise performance threshold of 65 dBA L_{dn}. Therefore, project-related stationary noise sources would not result in a substantial permanent increase compared with ambient noise levels existing without the project, and stationary source noise impacts on off-site receptors would be less than significant.

Market Hall

The Market Hall would be a gathering venue for events such as live music, fundraisers, or farmers' markets. As such, operation of the Market Hall would result in a temporary increase in ambient noise levels when these events are held in the plaza. The plaza is located approximately 410 feet from the nearest noise-sensitive receptor, which is the single-family residence located east of the project site on Gravenstein Way. However, the Market Hall building blocks the line of sight to this closest receptor, which would provide a minimum of 12 dBA of shielding reduction for noise from events held in the plaza. Distance attenuation alone would provide a minimum of 25 dBA reduction compared to noise levels measured at 25 feet from the noise sources on the plaza. In addition, the closest receptor that would have a potential direct line of sight to the plaza is the single-family residence located on Gilbert Court, approximately 550 feet from the plaza area. Distance attenuation and shielding provided by intervening trees and shrubs would provide a minimum of 28 dBA of reduction. This would preclude noise from live music and farmer market type events held at the plaza area from resulting in noise levels that would exceed the daytime or nighttime hourly noise thresholds established and enforced by the City's Municipal Code. Therefore, noise levels from events held on the plaza would not result in a substantial temporary increase compared with ambient noise levels existing without the project, and this stationary source noise impact on off-site receptors would be less than significant.

Operational/Mobile Source Noise Impacts

Less than significant impact. According to the Cotati General Plan, the City considers permanent increases in ambient noise levels to be significant if a new development would result in an increase by any of the following levels as measured at the outdoor activity area of any noise-sensitive land use:

- +1.5 dBA L_{dn} where existing traffic noise levels are greater than 65 dBA L_{dn}; or

- +3 dBA L_{dn} where existing traffic noise levels range between 60 dBA and 65 dBA L_{dn}; or
- +5 dBA L_{dn} where existing traffic noise levels are less than 60 dBA L_{dn}; or
- +3 dBA L_{dn} above existing ambient noise levels resulting from the inclusion of new non-transportation or stationary noise sources.

The highest traffic noise level increase with implementation of the project would occur along the Old Redwood Highway between SR-116 and Saint Joseph Way under existing plus project conditions. Along this roadway segment, project implementation would result in an increase of 0.2 dBA L_{dn}. This increase would be well below the City's most stringent substantial permanence increase threshold of 1.5 dBA L_{dn}. Therefore, project-related traffic noise impacts on existing ambient noise levels would be less than significant.

As discussed in Impact 13(a), new stationary noise sources resulting from implementation of the project would not result in noise levels above existing ambient noise levels as measured at off-site sensitive receptors. Existing traffic noise levels along Old Redwood Highway, adjacent to the nearest off-site sensitive receptors ranges up to 63.8 dBA L_{dn}. The maximum noise level generated by project-related stationary noise sources would range up to 50 dBA L_{max}. These noise levels are well below the existing traffic noise levels in the project vicinity. Therefore, project-related traffic noise sources would not result in a substantial permanent increase compared with traffic noise levels existing without the project, and noise impacts on off-site receptors would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact. The City of Cotati's General Plan establishes criteria for vibration impacts to adjacent uses during demolition and construction activities. Per General Plan Policy N 1.15, significant impacts would occur if demolition and construction activities would exceed the City's vibration limit of 0.30 inches per second (in/sec) peak particle velocity (PPV) at buildings of normal conventional construction.

Although groundborne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects such as the shaking of a building can be notable.

In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include construction activities such as blasting, pile driving and operating heavy earthmoving equipment. However, construction vibration impacts on building structures are generally assessed in terms of PPV. For purposes of this analysis, project related impacts are expressed in terms of PPV.

Propagation of vibration through soil can be calculated using the vibration reference equation:

PPV= PPV ref * (25/D)^n (in/sec)

Where:

PPV = reference measurement at 25 feet from vibration source
D = distance from equipment to property line
n = vibration attenuation rate through ground

According to Chapter 12 of the Federal Transit Administration Transit Noise and Vibration Impact Assessment manual (2006), an "n" value of 1.5 is recommended to calculate vibration propagation through typical soil conditions.

Short-term Construction Vibration Impacts

Of the variety of equipment that would be used during construction, small vibratory rollers would produce the greatest groundborne vibration levels. Small vibratory rollers produce groundborne vibration levels ranging up to 0.101 in/sec PPV at 25 feet from the operating equipment. Impact equipment such as pile drivers is not expected to be used during construction of this project.

The closest off-site structure to the proposed construction areas is a commercial building (coffee shop) that is located across Old Redwood Highway from the project site. The facade of this building would be located approximately 160 feet from the proposed construction footprint where heavy equipment would operate. At this distance, groundborne vibration levels would attenuate to less than 0.006 in/sec PPV from the operation of a small vibratory roller. These levels are well below the City's standard of 0.30 in/sec PPV for buildings of normal conventional construction. Therefore, construction-related groundborne vibration levels would have a less than significant impact on off-site receptors in the project vicinity.

Operational Vibration Impacts

Implementation of the project would not include any new permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the project vicinity. Project operational groundborne vibration level impacts would be considered less than significant.

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 impact. The nearest airport to the project site is Petaluma Municipal Airport, located approximately 7.5 miles southeast of the project site. Because of the distance from and orientation of the airport runways, the project site is located well outside of the 55 dBA CNEL airport noise contours. The project site is also not located within the vicinity of a private airstrip. As a result, implementation of the project would not expose people residing or working in the project area to excessive noise levels established by the City or an airport land use plan. Therefore, there would be no impacts associated with airport noise.

Mitigation Measures

Applicable mitigation measure of the Downtown Specific Plan EIR (modified to reflect the latest best management practice noise reduction techniques):

NOI-1 All construction activities associated with the Downtown Specific Plan shall comply with existing City standards and policies established within the City's General Plan and Municipal Code. In addition, the following measures shall be implemented.

- The construction contractor shall post a sign at all entrances to the work site prior to commencement of the work informing all contractors and subcontractors, their employees, agents, delivery personnel and all other persons at the property of the basic limitations upon noise and construction activities provided in the City's General Plan and Municipal Code.
- The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site.
- The construction contractor shall locate equipment staging in areas that will create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- The construction contractor shall ensure that all equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
- The construction contractor shall ensure that unnecessary idling of internal combustion engines (i.e., idling in excess of 5 minutes) is prohibited.
- The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- The construction contractor shall designate a noise disturbance coordinator who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (starting too early, bad muffler, etc.) and establishment reasonable measures necessary to correct the problem. The construction contractor shall visibly post a telephone number for the disturbance coordinator at the construction site.
- The construction contractor shall limit construction activities to the allowable hours established by the City's Municipal Code. This ordinance limits construction activities to the hours between 7:00 a.m. to 7:00 p.m. Monday through Friday; and 9:00 a.m. and 5:00 p.m. on Saturdays, Sundays, or holidays if such activities are approved by the reviewing authority through specific project conditions of approval.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
14. Population and Housing *Would the project:*				
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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

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)?

Less than significant impact. The proposed project would involve construction and operation of a new four-story hotel and market area near the City's downtown area. Once operational, the project would support up to 40 full time equivalent positions. As of December 2018, the California Department of Employment Development (EDD) estimated the Sonoma County labor force to be 268,000. Of this figure, 261,000 persons were employed and 7,000 were unemployed. As such, there is sufficient available labor in Sonoma County to fill the proposed project's employment opportunities from the local workforce. Further, as the project is an infill development, the project site is well served by existing services and infrastructure and will not require the expansion or construction of new utilities to provide adequate service. Thus, substantial population growth would not occur. As such, impacts would be less than significant.

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

No impact. The project site contains a surface parking lot and weedy vegetation; there are no existing dwelling units. As such, development of the proposed project would not displace any persons or housing, and there would be no associated impact.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
15. Public Services *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Environmental Evaluation

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

Less than significant impact. The Rancho Adobe Fire Protection District provides fire protection and emergency services to an approximately 86 square mile service area that includes the City of Cotati, Town of Penngrove, and unincorporated areas of Petaluma. The closest fire facility to the project site is Station No. 1, located approximately 0.33 mile to the southeast. The proposed project would develop a 4-story hotel and Market Hall on the project site. Using an average travel speed of 25 miles per hour, it would take a fire engine 48 seconds to respond from Station No. 1 to the project site. Furthermore, because the project consists of a multi-story building, it will be required to implement Fire Code requirements associated with alarm/warning systems, evacuation, and suppression. Additionally, in the event of an emergency, the Fire District would be able to summon mutual aid from neighboring fire agencies. As such, the proposed project would be served with adequate fire protection and no new or expanded fire facilities would be required. The project applicant will be required to pay development fees to the Fire District at the time building permits are sought. Impacts would be less than significant.

b) Police protection?

Less than significant impact. The Cotati Police Department provides police protection services to the project site and to the City. The Police Department currently has one station, which is located

approximately 0.5 mile south of the project site. The proposed project would develop a hotel and Market Hall on the project site. The project vicinity is located within an urbanized portion of the Cotati city limits that is routinely patrolled by the Police Department. As such, no new or expanded police facilities would be required. The project applicant will be required to pay development fees to the Police Department at the time building permits are sought. Impacts would be less than significant.

c) Schools?

No impact. Public education services in the City of Cotati are provided by the Cotati-Rohnert Park Unified School District, which comprises 12 schools. The proposed project would develop a hotel and Market Hall on the project site, which would provide 40 full-time equivalent employment opportunities. As previously discussed, the proposed project would not result in substantial growth inducement and, therefore, would not substantially increase enrollment in local K-12 schools. As such, no new or expanded school facilities would be required. No impact would occur.

d) Parks?

No impact. The City of Cotati Public Works Department owns and operates 15 parks, recreation areas, or open space areas totaling 32.7 acres. The proposed project would develop a hotel on the project site, which would provide 40 full-time equivalent employment opportunities. As previously discussed, the proposed project would not result in substantial growth inducement and, therefore, would not substantially increase demand for parks. As such, no new or expanded park facilities would be required. The project applicant will be required to pay development fees to the City of Cotati for parks at the time building permits are sought. No impact would occur.

e) Other public facilities?

No impact. The Rohnert Park-Cotati Regional Library is located approximately 1.30 miles northeast of the project site. The proposed project would develop a hotel on the project site, which would provide 40 full-time equivalent employment opportunities. As previously discussed, the proposed project would not result in substantial growth inducement and, therefore, would not increase demand for library services. As such, no new or expanded library facilities would be required. The project applicant will be required to pay development fees to the City of Cotati for libraries at the time building permits are sought. No impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
16. Recreation				
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Evaluation

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 impact. The proposed project would develop a hotel on the project site, which would provide 40 full-time equivalent employment opportunities. As previously discussed, the proposed project would not result in substantial growth inducement and, therefore, would not increase demand for parks. As such, no new or expanded park facilities would be required. The project applicant will be required to pay development fees to the City of Cotati for parks at the time building permits are sought. No impact would occur.

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 impact. Besides the hotel amenities provided as part of the project, no other recreational facilities would be developed. Accordingly, the project would not result in the construction or expansion of recreational facilities that might have adverse physical effect on the environment. No impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
17. Transportation *Would the project:*				
a) Conflict with a program, plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

The analysis in this section is based upon a Transportation Impact Analysis prepared by TJKM. The report is provided in Appendix E.

Environmental Evaluation

Would the project:

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less than significant impact with mitigation incorporated. TJKM prepared a Traffic Impact Assessment that evaluated the proposed project's impacts on measures of effectiveness of the circulation system. The findings are summarized as follows.

Trip Generation

Project trip generation is summarized in Table 18. The proposed project would generate 1,417 daily trips, including 76 AM peak-hour trips and 104 PM peak-hour trips.

Table 18: Project Trip Generation

Land Use	Characteristics	Daily	AM Peak-hour			PM Peak-hour		
			In	Out	Total	In	Out	Total
Hotel	147 rooms*	1,229	41	28	69	45	43	88
Market Hall	3,596 square feet	384	8	6	14	17	16	33
(Internal Trips)	(15 percent)	(58)	(1)	(1)	(2)	(3)	(2)	(5)

Table 18 (cont.): Project Trip Generation

Land Use	Characteristics	Daily	AM Peak-hour			PM Peak-hour		
			In	Out	Total	In	Out	Total
Subtotal	—	1,555	48	33	81	59	57	116
(Passby Trips)	(36 percent)	(138)	(3)	(2)	(5)	(6)	(6)	(12)
Total Net Trip Generation	**—**	**1,417**	45	31	**76**	53	51	**104**

Note:
* Following preparation of the Traffic Study in February 2019, the applicant revised the project to include six additional rooms. TJKM prepared a Technical Memorandum provided in Appendix F that indicated that the six rooms would generate 50 net new daily trips, 3 net new AM peak hour trips, and 4 net new PM peak hour trips. These additional values would not materially change any of the conclusions of the traffic analysis.
Source: TJKM 2019.

Existing Plus Project Traffic Conditions

Table 19 summarizes Existing Plus Project Traffic Conditions. This scenario represents the addition of project-related trips to existing traffic conditions. As shown in the table, the intersection of Old Redwood Highway/William Street/George Street would operate at unacceptable Level of Service (LOS) F during all peak-hours under Existing and Existing Plus Project Traffic Conditions; all other intersections would operate acceptably.

Table 19: Existing Plus Project Conditions Traffic

No.	Intersection	Control	Peak-hour	Existing		Existing Plus Project		
				Average Delay	LOS	Average Delay	LOS	Significant LOS Impact?
1	U.S. 101 Southbound Ramps/SR-116	Signalized	AM	15.8	B	15.8	B	No
			PM	15.8	B	15.8	B	No
2	U.S. 101 Northbound Ramps/SR-116	Signalized	AM	14.2	B	14.3	B	No
			PM	13.4	B	13.7	B	No
3	Old Redwood Highway/SR-116	Signalized	AM	25.6	C	25.9	C	No
			PM	33.9	C	35.8	D	No
4	Old Redwood Highway/St. Joseph Way	Side-street stop	AM	12.2	B	12.3	B	No
			PM	13.3	B	13.8	B	No
5	Old Redwood Highway/Driveway (Future Roadway Location)	Side-street stop	AM	0.0	A	13.4	B	No
			PM	25.9	D	29.8	D	No
				0.1[3]	A[3]	0.3[3]	A[3]	No

Table 19 (cont.): Existing Plus Project Conditions Traffic

No.	Intersection	Control	Peak-hour	Existing		Existing Plus Project		
				Average Delay	LOS	Average Delay	LOS	Significant LOS Impact?
6	Old Redwood Highway/William Street/George Street	All-way stop	AM	20.1	C	20.7	C	No
			PM	**54.0**	**F**	**58.5**	**F**	No[4]

Notes:
[1] LOS = Level of Service
[2] Average intersection delay expressed in seconds per vehicle for signalized and all-way stop-controlled intersections. Worst approach delay is presented for side-street stop controlled intersections (except where both the worst case and average delay for all approaches is indicated).
[3] Indicates LOS and average delay for all approaches at the side-street stop-controlled intersection of Old Redwood Highway with the existing driveway.
[4] Project impact is considered less than significant because average vehicle delay would increase by less than five seconds with the addition of project traffic
Bold indicates intersections that operate at deficient LOS. City of Cotati standards define LOS D or better as acceptable (or LOS E for intersections within the boundaries of the Downtown Specific Plan). All study intersections except No. 1 and No. 2 (U.S. 101 off- and on-ramp intersections with Gravenstein Highway) are located within the boundaries of the Downtown Specific Plan
Source: TJKM 2019.

During the AM peak-hour, each of the study intersections would continue to operate at an acceptable LOS under Existing plus Project Conditions. During the PM peak-hour under Existing plus Project Conditions, all study intersections would continue to operate acceptably with the exception of the all-way stop-controlled intersection of Old Redwood Highway & William Street/George Street that operates at LOS F under Existing Conditions (without the project). The project does not result in a degradation of LOS at U.S. 101 ramps intersections, nor would the project result in ramp queues extending on to the freeway, while the volume of project traffic is not anticipated to significantly increase freeway demand-to capacity (d/C) rations by more than 0.01. Allowing left-turns inbound to St. Joseph Way is not anticipated to affect intersection LOS since usage of the left-most northbound lane is relatively limited, with most vehicles using the adjacent center lane to make a downstream left-turn on to Gravenstein Highway.

The addition of 25 southbound project trips during the PM peak-hour would increase average PM peak-hour delay at the Old Redwood Highway & William Street/George Street intersection from 54.0 to 58.5 seconds—thus an increase of less than 5 seconds—which is therefore considered a less than significant impact based on the impact criteria identified by the town. Traffic impacts under Existing plus Project Conditions are therefore anticipated to be less than significant.

The Cotati General Plan identifies signalization of the Old Redwood Highway & William Street/George Street intersection as a planned improvement to occur by 2040, which would improve the LOS to acceptable conditions (as shown in the cumulative analysis section). Signalization prior to 2040 would be funded through traffic impact fee payments from development projects, including the project.

Cumulative Traffic Conditions

Future traffic volumes for the year 2040 were derived from the Cotati General Plan EIR, based on General Plan buildout to SOI/UGB, which forecasted volumes using the SCTA regional travel demand model to determine future traffic associated with regional growth and travel patterns, along with a Citywide TRAFFIX model manually assigned traffic growth to streets in the City of Cotati associated with the land uses contained in the City of Cotati's updated General Plan.

Planned Roadway Improvements

The General Plan identified the following planned improvements under Action CI 1b "Complete the following roadway improvements on City streets to improve the safety and efficiency of the current circulation system, and to support buildout of the General Plan":

- Install a traffic signal on Madrone Avenue at the intersection of Gravenstein Highway, establishing the north leg as the primary roadway connection to Derby Lane and Locust Avenue.
- Eliminate the current skewed intersection at Gravenstein Highway/Derby Lane.
- Realign the eastern portion of Derby Lane so that it extends as an east—west collector street to Alder Avenue.
- Construct a new north—south collector street in the western portion of the City, intersecting Gravenstein Highway approximately midway between Locust Avenue and Alder Avenue. Extend the street northward to Helman Lane and southward to intersect with an eastward extension of Isabel Drive.
- Install a traffic signal on the new north-south collector street at the intersection of Gravenstein Highway.
- Eliminate the intersection at Gravenstein Highway/Alder Avenue once a connection between Alder Avenue and the new north—south collector street is established.
- Construct a minor realignment of West Cotati Avenue to intersect Gravenstein Highway at an improved angle, and install a traffic signal at the intersection.
- Restrict direct access between private parcels and Gravenstein Highway once alternative access is established (i.e., parallel roadways and new intersections as described above).
- Add a southbound right-turn pocket on Redwood Drive at the Gravenstein Highway intersection.
- Widen Helman Avenue to include a center turn lane in areas with abutting Commercial and/or Industrial uses.
- Eliminate the northbound left-turn pocket at Old Redwood Highway/Commerce Avenue/U.S. 101.
- North On-ramp and convert to a through lane.

- Eliminate the southbound left-turn movement at Gravenstein Highway/Old Redwood Highway (modification is only needed with buildout to SOI/UGB).
- Install a traffic signal at Old Redwood Highway and William Street/George Street.
- Reassign lanes at the Old Redwood Highway and East Cotati Avenue/West Sierra Avenue intersection to better serve traffic demands. One possible modification includes restriping the southbound approach to include dual left-turn lanes and a combined through/right—turn lane; restriping the westbound approach to include separate through and right-turn lanes
- East Cotati Avenue to include dual eastbound through lanes through the La Plaza intersection before merging to a single lane, and eliminating the westbound left—turn lane and movements (except buses).
- Install a traffic signal at East Cotati Avenue and Charles Street.
- Install a traffic signal at East Cotati Avenue and La Salle Avenue.
- Install a traffic signal at East Cotati Avenue and Santero Way and add a northbound right-turn pocket.
- Install all-way stop-controls at the intersection of West Sierra Avenue and U.S. 101 South On-ramp-/West School Street.

In addition, the future roadway would include a planned signalized intersection with Old Redwood Highway at study intersection No. 5.

Under Cumulative (Year 2040) conditions, the vehicle trip assignment will differ given provision of Future Roadway to connect with Old Redwood Highway with a signalized intersection (study intersection No. 5). Provision of the future roadway would allow outbound project trips to the north to access Old Redwood Highway via the Future Roadway, making a left-turn on to northbound Old Redwood Highway. Similarly, inbound project trips from the south would be able to access the project site via a left-turn from Old Redwood Highway to the Future Roadway at study intersection No. 5, thus no longer requiring the allowance of northbound left-turns from Old Redwood Highway to St. Joseph Way as would occur under Existing plus Project Conditions. Table 20 summarizes peak-hour levels of service at the study intersections under Cumulative Conditions, with and without the project.

Table 20: Cumulative Plus Project Conditions Traffic

No.	Intersection	Control	Peak-hour	Cumulative (No Project)		Cumulative Plus Project		
				Average Delay	LOS	Average Delay	LOS	Significant LOS Impact?
1	U.S. 101 Southbound Ramps/SR-116	Signalized	AM	46.3	D	47.0	D	No
			PM	30.4	C	31.4	C	No
2	U.S. 101 Northbound Ramps/SR-116	Signalized	AM	32.2	C	32.2	C	No
			PM	34.2	C	36.8	D	No

Table 20 (cont.): Cumulative Plus Project Conditions Traffic

No.	Intersection	Control	Peak-hour	Cumulative (No Project)		Cumulative Plus Project		
				Average Delay	LOS	Average Delay	LOS	Significant LOS Impact?
3	Old Redwood Highway/SR-116	Signalized	AM	27.2	C	27.7	C	No
			PM	55.2	E	57.7	E	No
4	Old Redwood Highway/St. Joseph Way	Side-street stop	AM	15.3	C	15.5	B	No
			PM	17.5	C	18.6	C	No
5	Old Redwood Highway/Driveway (Future Roadway Location)	Signalized	AM	5.6	A	5.7	A	No
			PM	9.0	A	11.3	B	No
6	Old Redwood Highway/William Street/George Street	Signalized	AM	5.7	A	5.7	A	No
			PM	5.4	A	5.4	A	No

Notes:
[1] LOS = Level of Service
[2] Average intersection delay expressed in seconds per vehicle for signalized intersections. Worst approach delay for is presented for stop controlled intersections.
Bold indicates intersections that operate at deficient LOS. City of Cotati standards define LOS D or better as acceptable (or LOS E for intersections within the boundaries of the Downtown Specific Plan). All study intersections except No. 1 and No. 2 (U.S. 101 off- and on-ramp intersections with Gravenstein Highway) are located within the boundaries of the Downtown Specific Plan. Therefore, LOS E is acceptable at intersections No. 3 to No. 6.
Source: TJKM 2019.

Each of the study intersections would operate acceptably under Cumulative Conditions, with or without the proposed project. The project does not result in a degradation of LOS at U.S. 101 ramps intersections, nor would the project result in ramp queues extending on to the freeway, while the volume of project traffic is not anticipated to significantly increase freeway d/C rations by more than 0.01. Traffic impacts under Cumulative Conditions are anticipated to be less than significant.

Congestion Management Plan

U.S. 101 is a Congestion Management Plan facility. The proposed project would add 40 AM peak-hour trips to U.S. 101 and 42 PM peak-hour trips to U.S. 101. For comparison purposes of comparison, the segment of U.S. 101 adjacent to the project site is six lanes with an average daily traffic volume of 103,000 vehicles in 2016. The proposed project would have *de minimis* contribution to U.S. 101. Impacts would be less than significant.

Alternative Modes of Transportation

The proposed project would provide a total of 30 motor vehicle parking spaces that would be made available for weekday park-and-ride transit users. The project includes bicycle racks to accommodate 24 bicycles. In addition, four covered bicycle spaces will be provided. A sidewalk would be constructed along the St. Joseph Way frontage. Therefore, impacts to transit, bicycle, and pedestrian facilities are considered less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less than significant impact. The proposed project would generate 2,444,112 vehicle miles traveled (VMT) on an annual basis. At the time of this writing, there are no adopted VMT thresholds of significance. Thus, impacts are less than significant.

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

Less than significant impact. Vehicular access would be taken from St. Joseph Way. TJKM reviewed project site access and egress to the north via the proposed U-turn provisions. TJKM determined that the proposed driveway and parking lot configuration would be adequate to accommodate motor vehicle, bicycle, and pedestrian access. The project would not substantially increase hazards due to a geometric design feature. Impacts would be less than significant.

d) Result in inadequate emergency access?

Less than significant impact. Emergency access would be available from St. Joseph Way and an Emergency Vehicle Access to Gravenstein Highway. Additionally, a future roadway connection to Old Redwood Highway would provide a third route for emergency access. The proposed project would provide one driveway on St. Joseph Way that would be required to comply with Fire Code standards for emergency access. As such, adequate emergency access would be provided. Impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
18. Utilities and Service Systems *Would the project:*				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

The analysis in this section is based upon a Sewer Capacity Memo prepared by BKF. The memo is provided in Appendix F.

Environmental Evaluation

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than significant impact. The proposed project would develop a hotel and Market Hall on the project site. The project would be served by an existing 6-inch diameter water line located within St.

Joseph Way. Using a water consumption rate of 1,800 gallons/acre/day, the proposed project would demand 8.07 acre-feet of water annually[5].

The City of Cotati Urban Water Management Plan (UWMP) indicates that the 2035 total water supply would be 2,076 acre-feet. Buildout of the General Plan planning area would result in a total water demand of 1,757 acre-feet in 2035. As such, there would be 319 acre-feet of surplus capacity at buildout in 2035. Thus, the project's annual demand of 8.07 acre-feet would be within surplus and no new or expanded water facilities would be required. Impacts would be less than significant.

The proposed project would increase impervious surface coverage and, therefore, have the potential to increase runoff. The proposed project would install a storm drainage system consisting of bioswales, inlets, underground piping, and basins that would capture and detain runoff during storm events and meter its release at a rate no greater than the predevelopment condition of the project site into downstream waterways such that new or expanded facilities are required. Impacts would be less than significant.

As discussed in Item c), the proposed project's wastewater would not exceed the capacity of the Laguna Treatment Plant and no new or expanded public wastewater facilities would be required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than significant impact. The City's UMWP indicates that the 2035 water supply would be 2,076 acre-feet. At buildout in 2035, the City of Cotati would have a total water demand of 1,757 acre-feet. The proposed project's annual water demand of 8.07 acre-feet is within the surplus projected by the UWMP. Therefore, the City would have sufficient water supplies to accommodate the project without the need for new or expanded facilities. As a result, impacts are less than significant.

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?

Less than significant impact. The proposed project would develop a 153-room hotel and Market Hall on the 4-acre project site. This project is designated as "SPD Specific Plan, Downtown." The City of Cotati Sewer Collection System Master Plan assigns an effluent generation rate of 800 gallons/day/acre to the "Specific Plan, Downtown" designation. Using this rate, it is estimated that the project would generate 3,200 gallons per day of wastewater (0.0032 million gallons per day [mgd]).

Effluent from the project would be conveyed to an 8-inch diameter sewer line within St. Joseph Way. This line ultimately discharges to the P-1 sewer line in Old Redwood Highway, a trunk sewer that conveys effluent to the Laguna Treatment Plant. The City completed upgrades to the P-1 sewer line in early 2019 to correct capacity deficiencies. BKF, the applicant's engineer, evaluated sewer

[5] (1,800 gallons per day x 4 acres x 365 days)/325,581 gallons/acre-foot = 8.07 acre-feet a year (AFY)

capacity in the downstream sewer lines and confirmed that they have adequate existing capacity to serve the project.

Wastewater from the project would be treated at the City of Santa Rosa's Laguna Treatment Plant. The plant has a design capacity of 21.34 million gallons per day (mgd) and treats 17.5 mgd under existing conditions. The City of Cotati is allocated 0.76 mgd of the plant's capacity for effluent generated within the City's sewer service area. The City of Cotati generates 0.47 mgd of effluent under existing conditions. Thus, the addition of the project's 0.0032 mgd of effluent would not exceed the City's 0.76 mgd allocation or the Laguna Treatment Plant's available capacity. Thus, no new or expanded wastewater collection or treatment facilities are necessary to serve the project. Impacts would be less than significant.

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?

Less than significant impact. Solid waste, recyclables, compost materials are taken to the Central Disposal Facility, which has a daily permitted capacity of 2,500 tons. In 2012, the Central Disposal Site averaged approximately 1,250 tons per day of materials received for the entire Sonoma County. The General Plan EIR calculates that under the 2013 General Plan buildout the City of Cotati would result in 56.96 tons per day and 20,791 tons per year of solid waste. The amount of solid waste generated during construction and operation of the project is well within the permitted capacity. Therefore, this project would be served by a landfill with sufficient capacity. As result, impacts would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No impact. Solid waste disposal would follow the requirements of Recology, which must adhere to federal, State, and local statutes with regulations related to the collection of solid waste. The project would comply with all State and local waste diversion requirements including the City of Cotati Municipal Code Chapter 8.08, Solid Waste Management. As a result, solid waste disposal would comply with federal, State, and local statutes and regulations. Therefore, no impacts would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
19. Wildfire *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No impact. The project would not modify any existing roadways in a way that would impede emergency access or evacuation. The project proposes to remove an existing surface parking lot and construct a hotel along Gravenstein Highway and Old Redwood Highway. Vehicular access would be taken from St. Joseph Way. An emergency vehicle access would be provided onto Gravenstein Highway. Additionally, a future roadway connection to Old Redwood Highway would provide a third route for emergency access. Consistent with City General Plan Action CI 1s, the City would review the project to ensure adequate emergency vehicle access and pays development impact fees that contribute to cumulative circulation improvements.

The project is located at the intersection of two major roadways, which provide vehicular access to U.S. 101 and SR-116. Response vehicles and evacuees would likely use these routes in the event of an emergency. Any temporary roadway closures required during construction would be subject to City review and approval, which ensures consistency with local emergency requirements. Therefore, the project would have no impact on emergency response or emergency evacuation plans.

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 impact. The project site is within an urbanized portion of the Cotati city limits. The project site is not within or near a State Responsibility Area and is not mapped as a Very High Fire Hazard Severity Zone. This condition precludes the possibility of the project exposing project occupants to wildfire risks. No impact would occur.

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 impact. The project site is within an urbanized portion of the Cotati city limits. The project site is not within or near a State Responsibility Area and is not mapped as a Very High Fire Hazard Severity Zone. This condition precludes the possibility of the project requiring the installation of wildlife infrastructure. No impact would occur.

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 impact. The project site is within an urbanized portion of the Cotati city limits. The project site is not within or near a State Responsibility Area and is not mapped as a Very High Fire Hazard Severity Zone. This condition precludes the possibility of the project creating downstream flooding or landslides as result of wildfire. No impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
20. Mandatory Findings of Significance				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Environmental Evaluation

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less than significant impact with mitigation incorporated. The proposed project may result in several impacts associated with biological resources and cultural resources that would be significant if left unmitigated. MM BIO-1, MM BIO-2, MM BIO-3, MM CUL-1, and MM CUL-2 would fully mitigate all potential impacts to levels of less than significant. With the implementation of these mitigation measures, the proposed project would have less than significant impacts.

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

Less than significant impact with mitigation incorporated. Cumulative projects in the City of Cotati include buildout of the General Plan and the Downtown Specific Plan. Cumulative impacts related to air quality and noise are less than significant after mitigation. Additionally, these projects would contribute effluent to the P-1 trunk sewer, which was upgraded in 2019. Given the scope of the project and its impacts, the incremental effects of this project are not considerable relative to the effects of past, current, and probably future projects. As discussed previously, the proposed project does not have a significant cumulative traffic impact. Therefore, the proposed project would not result in cumulatively considerable impacts on these areas. Impacts would be less than significant.

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

Less than significant impact with mitigation incorporated. All impacts identified in this IS/MND are either less than significant after mitigation, or less than significant and do not require mitigation. Therefore, the proposed project would not result in environmental effects that cause substantial adverse effects on human beings either directly or indirectly. Impacts would be less than significant.

Mitigation Measures

None.

SECTION 3: REFERENCES

Bay Area Air Quality Management District (BAAQMD). 2010. 2010 Multi-Pollutant Clean Air Plan (CAP). Website: http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans. Accessed May 24, 2017.

Bay Area Air Quality Management District (BAAQMD). 2017. Air Quality Standards and Attainment Status. January. Website: http://www.baaqmd.gov/research-and-data/air-quality-standards-and-attainment-status. Accessed September 19, 2018.

Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan (CAP). Website: http://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed May 24, 2017.

Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. May. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed May 22, 2017.

California Department of Employment Development Department (EDD). 2018. Monthly Labor Force Data for Cities and Census Designated Places. December.

City of Cotati. 2009. Downtown Specific Plan.

City of Cotati. 2010. Urban Water Management Plan.

City of Cotati. 2015. City of Cotati General Plan.

City of Santa Rosa. 2019. "Water Reuse." Website: https://srcity.org/1052/Water-Reuse. Accessed February 21.

County of Sonoma Department of Health Services. 2010. 8600 Gravenstein Highway, Cotati, CA Site No. 00001479, NCRWQCB No. 1TSO008. December 16.

County of Sonoma. 2016. Comprehensive Airport Land Use Plan. Revised March 14.

TJKM. 2019. Cotati Hotel Transportation Impact Analysis. February.

United Nations Intergovernmental Panel on Climate Change (IPCC). 2007. Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. Website: www.ipcc.ch/publications_and_data/ar4/wg1/en/contents.html. Accessed April 25, 2016.

United States Department of Agriculture (USDA). 2017. Web Soil Survey. Website: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed July 2018.

United States Environmental Protection Agency (EPA). 1978. Protective Noise Levels 550/9-79-100. November.

THIS PAGE INTENTIONALLY LEFT BLANK

SECTION 4: LIST OF PREPARERS

FirstCarbon Solutions
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597

Project Director ..... Jason Brandman
Project Manager ..... Grant Gruber
Cultural Resource Specialist ..... Dana DePietro
Air Quality Analyst ..... Ella Li
Air Quality Analyst ..... Kimber Johnson
Noise Analyst ..... Phil Ault
Environmental Services Analyst ..... Chinmay Damle
Environmental Services Analyst ..... Ian Peterson
Environmental Services Analyst ..... Spencer Pignotti
Editor ..... Susie Harris
Word Processor ..... Ericka Rodriguez
GIS/Graphics ..... Karlee McCracken
Reprographics ..... Octavio Perez

TJKM—Technical Subconsultant (Traffic)
4305 Hacienda Drive, Suite 550
Pleasanton, CA 94588

Senior Project Manager ..... Colin Burgett

THIS PAGE INTENTIONALLY LEFT BLANK