



Notice of Intent to Adopt a Mitigated Negative Declaration

To: Public Agencies, Interested Parties, and Sonoma County Clerk
Project Title: T&L Commercial Microbusiness Facility, 3515 Industrial Drive, PRJ19-039
Lead Agency: City of Santa Rosa
100 Santa Rosa Avenue
Santa Rosa, CA 95404
Contact: Kristinae Toomians, Senior Planner
Tel: (707) 543-4692, E: KToomians@srcity.org
Review Period: June 19, 2020 to July 17, 2020

In accordance with the State CEQA Guidelines, the City of Santa Rosa has prepared this notice to inform agencies and interested parties that it is releasing an Initial Study and Proposed Mitigated Negative Declaration (IS/MND) for the T&L Commercial Microbusiness Facility, 3515 Industrial Drive (PRJ19-039) Project.

Project Description and Location

T&L Industrial LLC has submitted a General Plan Amendment, Rezoning and Conditional Use Permit application package (PRJ19-039) to the City of Santa Rosa (City) for a proposed Commercial Cannabis Microbusiness facility to be located at 3515 Industrial Drive (APN 148-041-049 and 148-050-027). The City is reviewing the planning application that would change the parcels' General Plan designation from Retail and Business Services (RBS) to Industry Light (IL) and rezoned from General Commercial (GC) to Industry Light (IL). The proposed commercial cannabis microbusiness operation would include cultivation, manufacturing and distribution in the existing building.

Providing Comments

A 30-day public review period will extend from June 19, 2020 to July 17, 2020. The IS/MND will be available for public review at the following location:

- City of Santa Rosa Community Development Department, 100 Santa Rosa Avenue, Room 3, Santa Rosa

Agencies and interested parties may provide written comments on the IS/MND for the project. Comments may be directed to the attention of Kristinae Toomians, 100 Santa Rosa Avenue, Santa Rosa, CA 95404, KToomians@srcity.org.

After the review period closes, the Santa Rosa City Council will consider a recommendation to adopt the IS/MND for the project during a regularly scheduled public meeting. We encourage you to check the City Council webpage to confirm the date and time of the meeting at the following website address:

<https://www.srcity.org/1375/Council-Meeting-Agendas-Minutes-Videos>

MITIGATED NEGATIVE DECLARATION

Project Title: T&L Commercial Microbusiness Facility, 3515 Industrial Drive, PRJ19-039

Date of Preparation: June 19, 2020

Lead Agency: City of Santa Rosa



Project Description: T&L Industrial LLC has submitted a General Plan Amendment, Rezoning and Conditional Use Permit application package (PRJ19-039) to the City of Santa Rosa (City) for a proposed Commercial Cannabis Microbusiness facility to be located at 3515 Industrial Drive (APN 148-041-049 and 148-050-027). The City is reviewing the planning application that would change the parcels' General Plan designation from Retail and Business Services (RBS) to Industry Light (IL) and rezoned from General Commercial (GC) to Industry Light (IL). The proposed commercial cannabis microbusiness operation would include cultivation, manufacturing and distribution in the existing building.

Project Location: 3515 Industrial Drive

General Plan: Retail and Business Services (RBS)

Zoning: General Commercial (GC)

Findings:

1. With the incorporation of mitigation measures, this project does not have the potential to degrade the quality of the environment, nor to curtail the diversity of the environment.
2. This project will not have a detrimental effect upon either short-term or long-term environmental goals.
3. This project will not have impacts that are cumulatively considerable.
4. This project will not have environmental impacts that will cause substantial adverse effects on human beings, either directly or indirectly.
 - o The proposed project could not have a significant effect on the environment and a Negative Declaration will be prepared.
 - 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.

Public Review Period: June 19, 2020 to July 17, 2020

Mitigation Measures: See Initial Study

Where to Submit Comments: City of Santa Rosa
100 Santa Rosa Avenue
Santa Rosa, CA 95404

Contact Person: Kristinae Toomians, Senior Planner
707-543-4692
KToomians@srcity.org

Attachment: Initial Study

**T&L COMMERCIAL MICROBUSINESS FACILITY,
3515 INDUSTRIAL DRIVE
PRJ19-039**

Santa Rosa, California

Initial Study

June 19, 2020

Prepared for:
City of Santa Rosa
100 Santa Rosa Avenue
Santa Rosa, CA 95404

Prepared by:
Brelje & Race Engineers
475 Aviation Blvd., Suite 120
Santa Rosa CA 95403
707/576-1322

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PROJECT DATA

Project Title: T&L Commercial Microbusiness Facility, PRJ19-039

Lead Agency: City of Santa Rosa
100 Santa Rosa Avenue
Santa Rosa, CA 95404

Contact Person: Kristinae Toomians, Senior Planner
707-543-4692
KToomians@srcity.org

Project Location: 3515 Industrial Drive, Santa Rosa
APN 148-041-049 and 148-050-027

General Plan Designation: Existing: Retail and Business Services (RBS)
Proposed: Industry Light (IL)

Zoning: Existing: General Commercial (GC)
Proposed: Industry Light (IL)

INTRODUCTION

The purpose of this Initial Study is to provide the Lead Agency, the City of Santa Rosa (City), with an assessment of relevant environmental information associated with implementation of the proposed project in order to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report (EIR) will be required for the project. This environmental evaluation is intended to fully inform the Lead Agency, other interested agencies, and the public of the proposed project and associated environmental impacts. This Initial Study has been prepared in conformance with the requirements of §15063 of the 2020 California Environmental Quality Act (CEQA) Guidelines.

If the Lead Agency determines that there is no substantial evidence that the project may cause a significant effect on the environment, then a Negative Declaration may be prepared. A Negative Declaration may include conditions of approval to avoid or reduce potential impacts. However, if the Initial Study determines that the project may cause an unavoidable or unknown significant effect on the environment, the Lead Agency must prepare an EIR.

The Initial Study process also enables the Lead Agency to modify a project, mitigating adverse effects before an EIR is prepared, thereby enabling the project to move forward under a Mitigated Negative Declaration. This facilitates the environmental evaluation portion of the project development process and eliminates unnecessary EIRs.

PROJECT SETTING AND BACKGROUND

The proposed project is located at 3515 Industrial Drive (APN 148-041-049 and 148-050-027) in northwest Santa Rosa. There is an existing building on the approximately 1.01 acre site that was built in 2004. The existing building's exterior footprint is approximately 13,650 square-feet but includes 19,500 square-feet of internal space including the mezzanine.

The project site is currently provided with water and wastewater service by the City, including fire flows. The site currently provides 54 parking spaces, three of which are ADA compliant.

The project area is entirely surrounded by commercial and light industrial uses. The nearest residential uses occur approximately one-quarter mile to the west and northwest and there is a mobile home park approximately the same distance to the south.

The project area has been impacted by wildfires twice since 2017. The



October 2017 Tubbs Fire burned the project area to the north, northwest and east, including the former K-Mart building and residential development to the west and northwest. Rebuilding has been on-going in the project area since. The 2019 Kincade Fire resulted in the project area being under mandatory evacuation though no damage to the project area occurred.

The project location is shown on Figure 1. An aerial view of the overall project site is shown on Figure 2 and the project in community context is shown on Figure 3. The proposed floor plan is provided on Figures 4 and 5 and additional site photos are provided on Figure 6.

PROJECT OBJECTIVES/PURPOSE AND NEED

T&L Industrial LLC is proposing to operate a Commercial Cannabis Microbusiness facility at 3515 Industrial Drive utilizing the existing building and on-site parking. The project will require a Conditional Use Permit, General Plan Amendment and Rezoning from the City. The project would include space in the existing building for cultivation, manufacturing (Type 6), and distribution of cannabis.

POLICY SETTING

Development in the project area and Santa Rosa in general is guided by the City's General Plan¹ and zoning ordinance. The City's current General Plan anticipates and plans for growth within the City until 2035. The General Plan includes infrastructure planning to accommodate orderly development associated with growth projections to 2035. The City's zoning code establishes permissible uses and development criteria for each zoning designation.

The City's ORD-2017-025 (Cannabis Ordinance) was adopted in 2017 and establishes regulations for where and how cannabis can be cultivated, processed, distributed and sold². This is further regulated by City Code. The Comprehensive Cannabis Land Use Policy Chart includes cannabis land use classifications (Retail, Cultivation and Support Uses) and summarizes where those uses are allowed by zoning district³.

Currently, the project site's zoning and General Plan designation do not allow for the proposed use. The project applicant understands that a General Plan Amendment and rezoning are necessary to conform to the City's Cannabis Ordinance. The project location's existing and proposed General Plan and zoning designations follow:

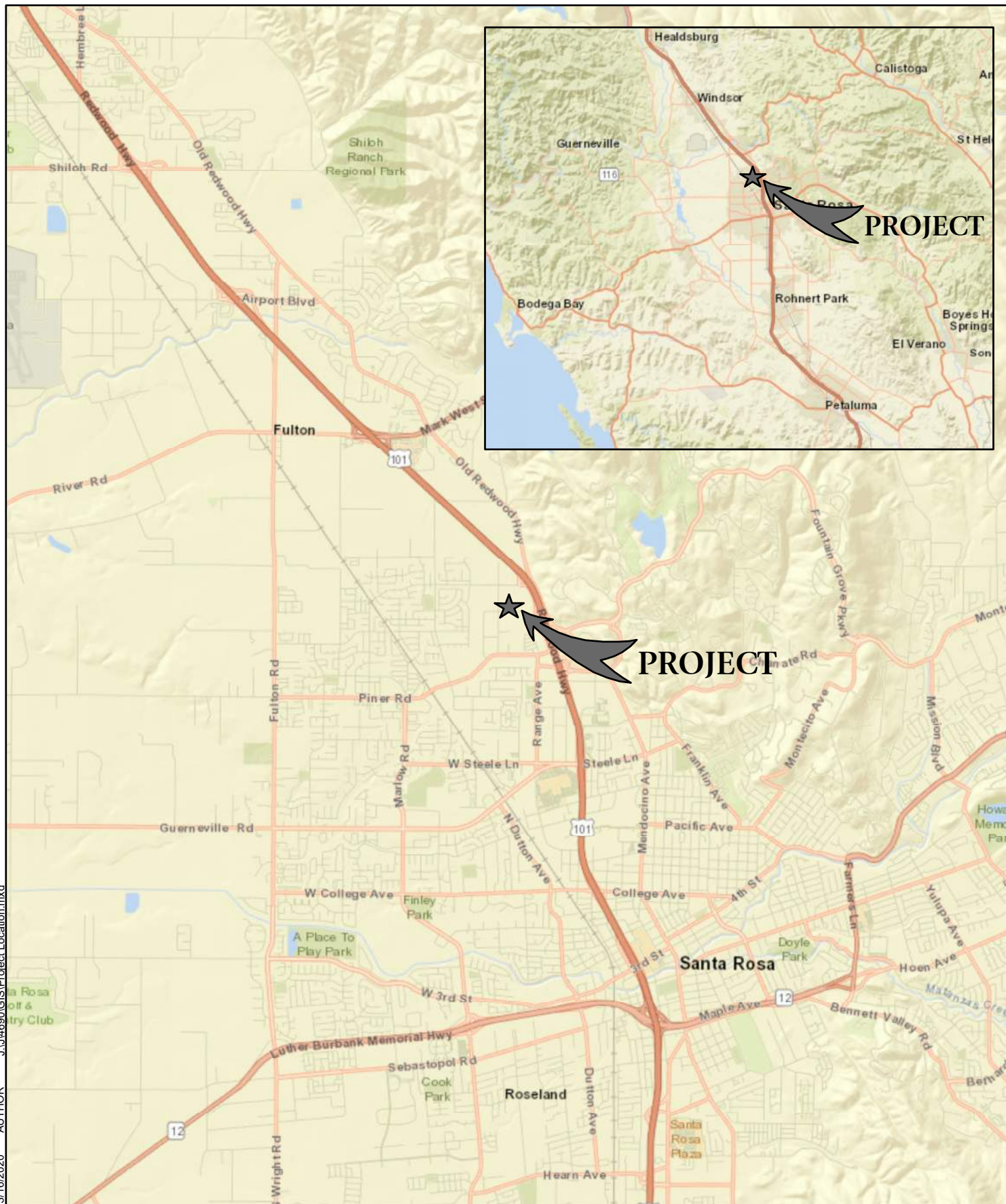
General Plan	Existing: Retail and Business Services (RBS)
Designation:	Proposed: Industry Light (IL)
Zoning:	Existing: General Commercial (GC)
	Proposed: Industry Light (IL)

¹ Santa Rosa General Plan 2035. City of Santa Rosa. November 3, 2009.

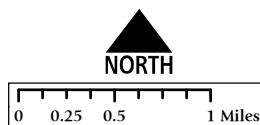
² <https://srcity.org/DocumentCenter/View/18691/Cannabis-Ordinance-CC---ORD-2017-025?bidId=>

³ <https://srcity.org/DocumentCenter/View/24272/Cannabis-Land-Use-and-Zoning-Table>

3/16/2020 AUTHOR J:\4690\GIS\Project Location.mxd



Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US



PROJECT LOCATION

FIGURE 1

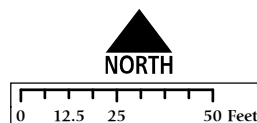
CITY OF SANTA ROSA

MARCH 2020

3/9/2020 AUTHOR J:\4690\GIS\Project Site.mxd



Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US



PROJECT SITE
FIGURE 2

CITY OF SANTA ROSA
MARCH 2020

3/12/2020 AUTHOR J:\4690\GIS\Project Community.mxd



Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

NORTH

0 100 200 400 Feet

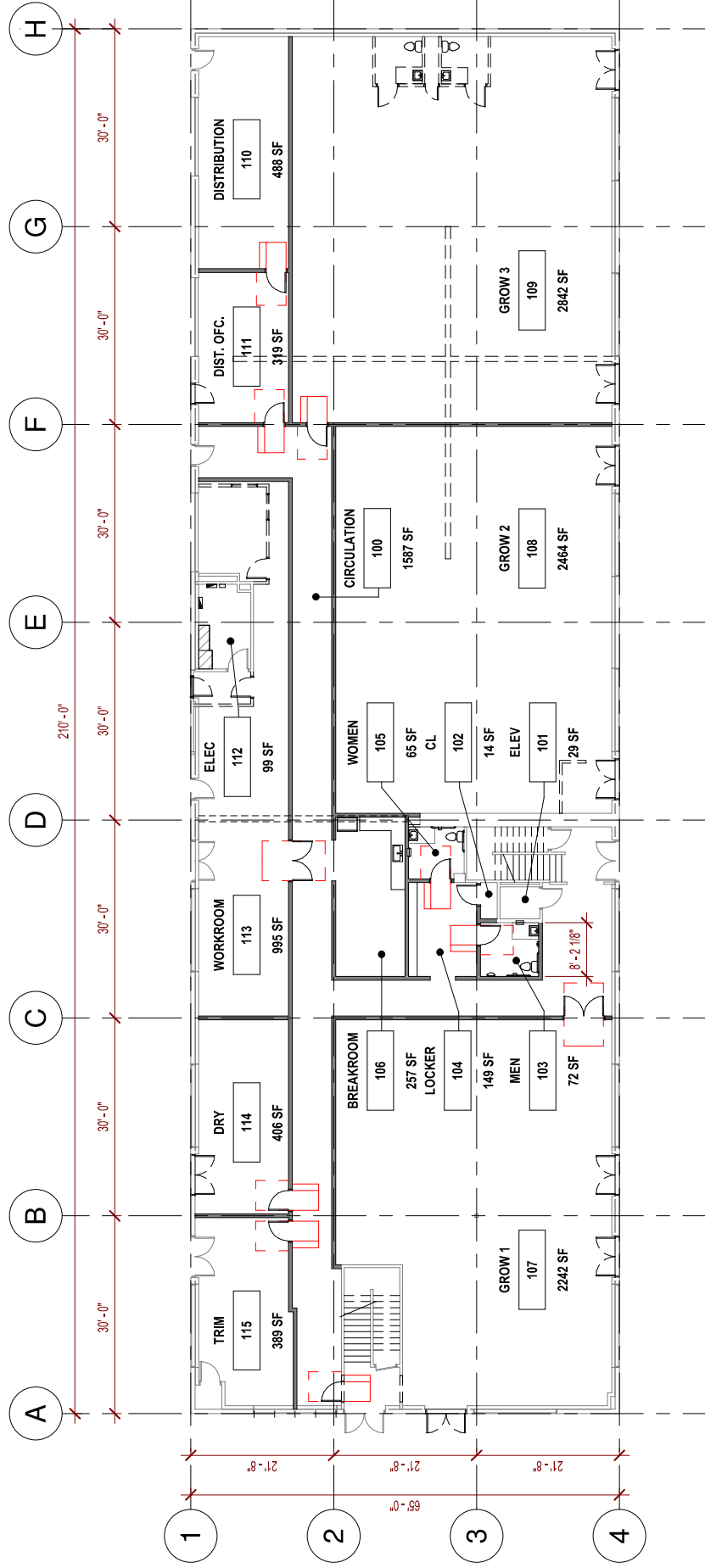
PROJECT COMMUNITY

FIGURE 3

CITY OF SANTA ROSA

MARCH 2020

Figure 4
NEW FIRST
FLOOR
PLAN



1 NEW FIRST FLOOR PLAN

1/16" = 1'-0"



Figure 5
NEW
SECOND
FLOOR
PLAN

USABLE SQUARE FOOTAGE		
ROOM NAME	ROOM NUMBER	AREA
GROW 2	108	2464 SF
GROW 3	109	2842 SF
GROW 1	107	2242 SF
DIST. OFC.	111	319 SF
DISTRIBUTION	110	488 SF
DRY	114	406 SF
WORKROOM	113	995 SF
TRIM	115	389 SF
ELEC	112	99 SF
CIRCULATION	100	1587 SF
STORAGE	205	216 SF
MANUFACTURING	207	1492 SF
CIRC	200	320 SF
BREAKROOM	106	257 SF
LOCKER	104	149 SF
WOMEN	105	65 SF
MEN	103	72 SF
GROW 4	209	2379 SF
SECURE STORAGE	204	142 SF
CL	102	14 SF
ELEV	101	29 SF
CIRCULATION	206	495 SF
STAIR	208	66 SF
ELEV	202	29 SF
CL	203	14 SF
STAIR	201	98 SF

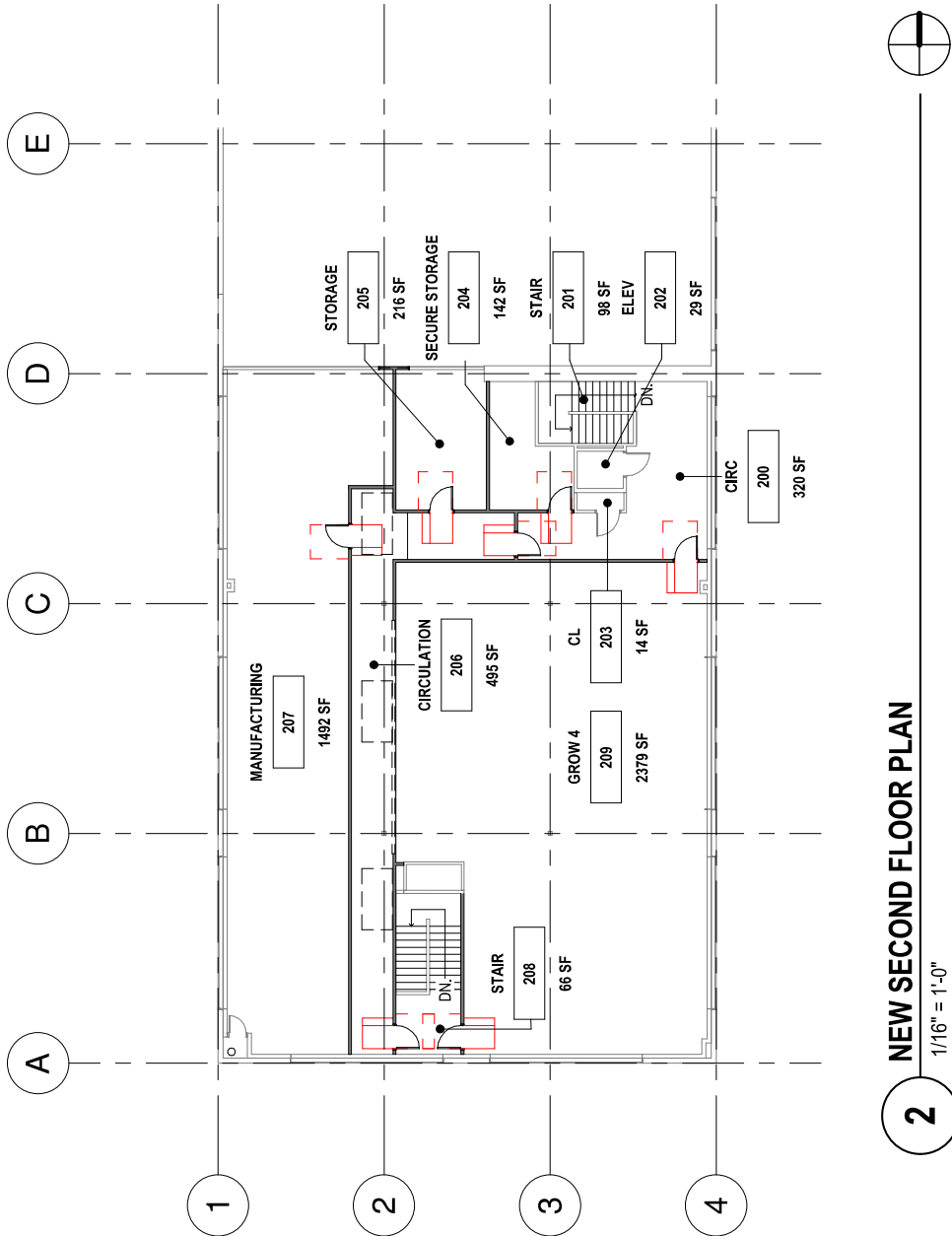
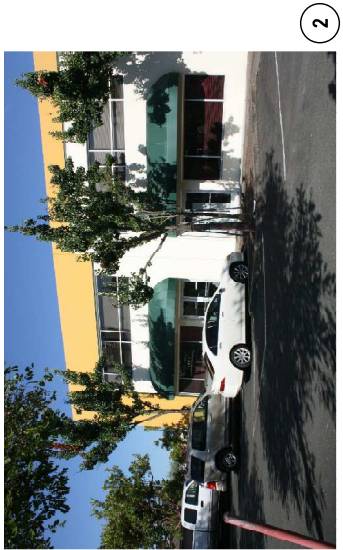
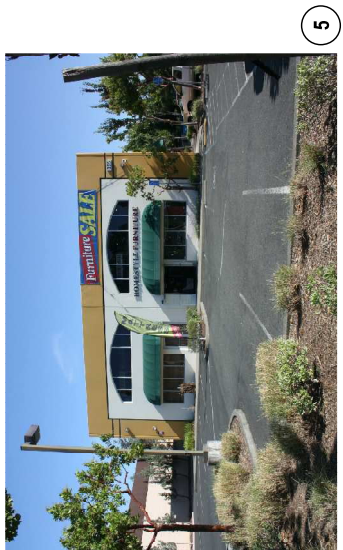
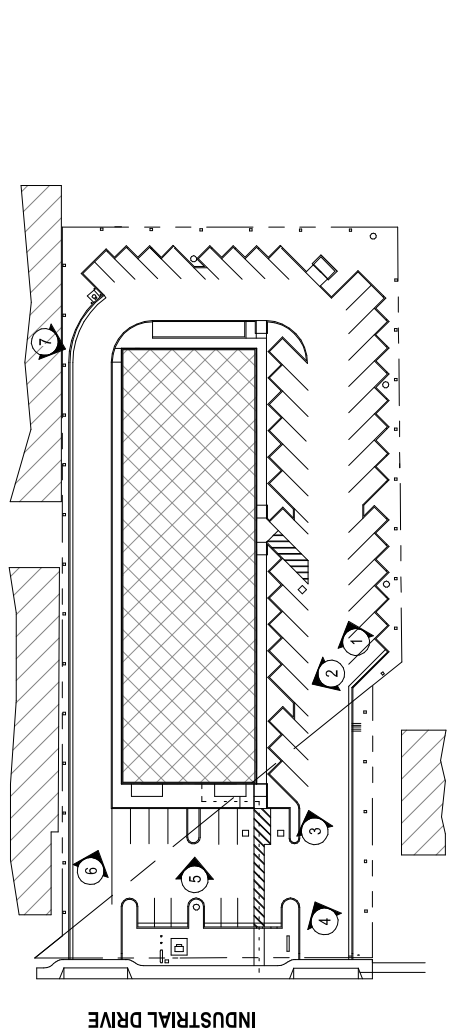
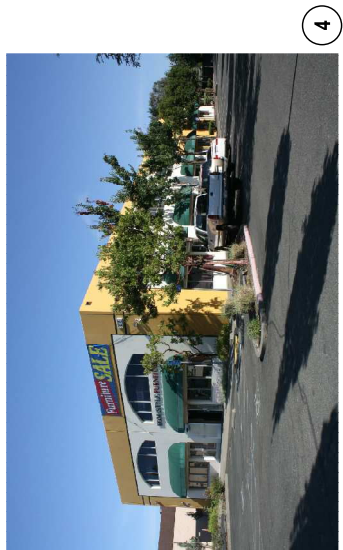
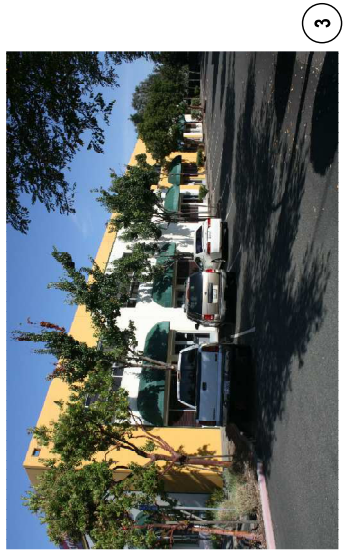
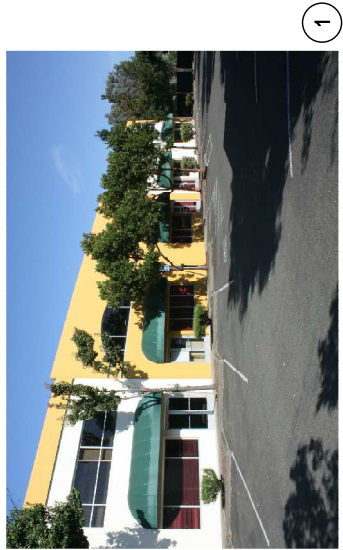


Figure 6
ELEVATION
PHOTOS

08/14/2019

3515 INDUSTRIAL CUP
3515 INDUSTRIAL DRIVE
SANTA ROSA, CA 95403

HENDERSON ARCHITECT
P.O. BOX 14874
SANTA ROSA CA, 95402
P: 707-237-5240
F: 707-237-2523



Under the IL General Plan and zoning designations, the City's ordinance would allow cultivation, manufacturing and distribution with a Conditional Use Permit. The proposed project would occur within an existing developed area and utilize an existing building surrounded by existing commercial and light industrial uses. However, due to the need to amend the General Plan for the project location to reflect Industry Light, CEQA review is required where the project would otherwise be exempt.

Please see the Land Use and Planning section of this document for further discussion on this issue.

PROJECT DESCRIPTION

The project site is currently developed with an existing 13,650 square-foot building located on APN 148-041-049 and 148-050-027 totaling 1.01 acre. Interior space is 19,500 square feet with the mezzanine level. Ingress and egress is currently via separate driveways onto Industrial Drive that would be retained. Existing parking includes 54 spaces, three of which are ADA compliant. Water and wastewater are currently provided by the City. Only minor exterior modifications are proposed, including ADA upgrades to parking and access (if necessary), building painting, exterior lighting, HVAC and the potential future addition of rooftop solar panels.

The existing building would be repurposed as a commercial cannabis microbusiness operation supporting cultivation, manufacturing and distribution, and be operated under California's Cannabis Microbusiness State License. The project does not propose any public cannabis retail sales. Interior partitioning of the existing building includes the following:

Use	Square Feet
Cultivation	9,927 and 216 storage
Manufacturing	3,282
Distribution	1,165
Ancillary	4,910

Ancillary space will be provided for storage, office, employee, and administration functions.

The project requires that the parcels' General Plan designation be changed from Retail and Business Services (RBS) to Industry Light (IL) and be rezoned from General Commercial (GC) to Industry Light (IL).

The project would be operated under and consistent with the State's Bureau of Cannabis Control Microbusiness license and the City's Cannabis Ordinance.

STAFFING

The project applicant estimates that there would be approximately ten employees with up to five employees at peak operating hours. The General Manager would be present five days a week and on call for emergencies. Shifts would be consistent with City code. Training, education, recordkeeping and reporting requirements would be consistent with regulations.

SECURITY

All access points from outside of the facility would have locks and alarms. All perimeter windows and access hatches would remain closed and locked with tamper-proof security devices and be equipped with perimeter alarms. All external doors would have two levels of security verification, requiring a key and an access code to unlock external doors. In the event of any theft or loss of cannabis, these devices will also provide a security log of those who accessed the doors. All doors would also be equipped with an alarm that would sound if they are opened without code and key or if they are damaged. The alarm system would include panic buttons and would be professionally monitored.

SECURITY PLAN

The project applicant shall develop a security plan, consistent with the City's Cannabis Ordinance.

STORAGE

Storage would be consistent with Environmental Health Safety (EHS) requirements. EHS requires that storage areas must be under continuous video-monitoring and recording and secured in accordance with their Security Plan. All cannabis storage areas would be under 24-hour security camera surveillance, including retention of video footage, in compliance with state law.

WASTE DISPOSAL AND HAZARDOUS MATERIALS

All cannabis products and any cannabis waste would be stored in an area secured with commercial-grade non-residential locks, that would not be visible to the public, and that prevents diversion, theft, loss, hazards and nuisance according to Santa Rosa, Cal., ORD-2017-25, Chapter 20 § 46.050 (G.3). All storage and handling of hazardous materials would occur in code compliant control areas. All vendors would be pre-scheduled in advance and must present valid identification. Vendors would only be granted access to the areas required for removal of waste. All waste removal vendors would be required to document and track all waste materials removed from the site.

CONSTRUCTION

Construction would be limited to interior reconfiguration and would include the construction of interior walls, lighting, HVAC equipment and ADA improvements. All work would be subject to City building permit requirements and meet current codes.

Because the building is intended to be repurposed, construction activities and equipment would be limited, would not involve grading or utility installation and would not result in additional traffic to the project area.

GROWTH INDUCEMENT POTENTIAL

The proposed project does not induce growth. The project site is currently developed and the existing building would be repurposed. Public utilities are currently provided to the site by the City and no increase in demand is anticipated.

OTHER PUBLIC AGENCY APPROVALS

The project is under City review authority. Due to the nature of the project, the following approvals are anticipated:

State of California Bureau of Cannabis Control

- A microbusiness (Type 12) license would be required and allows a licensee to engage in the cultivation of cannabis on an area less than 10,000 square feet and to act as a licensed distributor and Level 1 manufacturer (Type 6).

City of Santa Rosa

- Conditional Use Permit: Would place conditions on the project to ensure compliance with the City's regulations.
- Rezoning: Rezone the parcel from General Commercial (GC) to Industry Light (IL), consistent with the proposed use.
- General Plan Amendment: Amend the General Plan designation from Retail and Business Services (RBS) to Industry Light (IL), consistent with the proposed use.

ENVIRONMENTAL SIGNIFICANCE CHECKLIST

The following list of questions is provided by Appendix G of the CEQA Guidelines in order to determine a project's environmental impacts. The checklist utilized herein was substantially updated by the State of California in 2019.

Based on the project description, answers to the questions fall into one of four categories:

- Potentially Significant Impact
- Less Than Significant Impact with Mitigation Incorporation
- Less Than Significant Impact
- No Impact

A “No Impact” response indicates that no impact would result from implementation of the project. A “Less Than Significant Impact” response indicates that an impact would occur, but the level of impact would be less than significant. A “Less Than Significant with Mitigation Incorporation” response indicates that an impact is involved and, with implementation of the identified mitigation measure, such impact would be less than significant. A “Potentially Significant Impact” response indicates that there is substantial evidence that impacts may be significant if mitigation measures are unknown, infeasible, or not proposed. Each response is discussed at a level of detail commensurate with the potential for adverse environmental effect.

The discussion following each checklist consists of a *Setting* section including environmental and regulatory information, an *Analysis* section, a *Cumulative Impacts* discussion, and a section for identification of *Mitigation Measures*, as necessary. The *Analysis* section includes a discussion addressing whether the project would result in potential adverse environmental impacts. All potential impacts have been considered, including on-site and off-site impacts, direct and indirect impacts, construction and operation-related effects, as well as cumulative effects. The *Cumulative Impacts* section presents information regarding the project's potential cumulative impacts and is included in this section. If an impact(s) has been identified and mitigation is required to reduce the impact to a less than significant level, then such measures are contained in the *Mitigation Measures* sections.

I AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
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 buildings within a state scenic highway?	☐	☐	☐	■
c. In nonurbanized 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 Setting

The project is located in a developed portion of Northwest Santa Rosa on Industrial Drive and is entirely surrounded by developed commercial and light industrial uses. The general project area is within the central portion of the Santa Rosa Plain and topography is generally flat. There are no vistas in the project area from which the project would be visible. The major sources of light and glare in the project vicinity are from street lighting, vehicular traffic and development-associated nighttime lighting. There are no designated scenic highways or scenic corridors in the project area⁴. Site photos are provided on Figure 5.

Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

A scenic vista is generally considered a view of an area that has remarkable scenery or a resource that is indigenous to the area. The project site is not considered to be a scenic vista for the purposes of this environmental analysis because it is entirely within a developed area of Santa Rosa along Industrial Drive and is flat. The project will not have any significant impact on a scenic vista.

⁴ http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/

The project would not result in long-term physical adverse changes to the height or bulk of structures or view blockages along a view shed. The project would utilize an existing building within an existing built-up area. Therefore, obstruction of scenic views in the project area would not occur.

Construction activities would be almost entirely internal to the existing building. Short-term construction impacts associated with the project would not have a significant impact on any scenic vista.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no scenic highways in close proximity to the project. The City has not designated any scenic corridors in the project vicinity. The existing building is not visible from a scenic highway or corridor. Any visual impacts would be extremely minor and limited to the aesthetics of the existing building.

c. In nonurbanized areas, would the project 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?

The project occurs in an urbanized area, currently zoned as General Commercial (GC). The project would not significantly degrade the existing visual character of the project area. The project would repurpose an existing building for the proposed uses and therefore would not substantially degrade the existing visual character of the site or the urban surroundings.

The project would include rezoning to Industry Light (IL) to rectify the proposed use with the City's Cannabis Ordinance but would not include any substantial modifications to the existing building. Current zoning is consistent with the existing building's visual appearance and the proposed zoning of IL permits similar building style and mass. While the project would conflict with the zoning designation currently, aesthetics have no bearing on that conflict (the existing building would not conflict visually with the current or proposed zoning designation). Further, the project would not conflict with zoning regulations specific to visual issues in the project area once the parcel is rezoned, as proposed by the project applicant.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The project would not create a new substantial source of light or glare. The existing building provides nighttime lighting. In the permit applications to the City, the project applicant has proposed that interior and exterior lighting shall utilize best management practices and technologies for reducing glare, light pollution, and light trespass onto adjacent properties and the following standards: Exterior lighting systems shall be provided for security purposes in a manner sufficient to provide illumination and clear visibility to all outdoor areas of the premises, including all points of ingress and egress. Exterior lighting shall be stationary, fully shielded, directed away from adjacent properties and public rights of way, and of an intensity compatible with the neighborhood. All exterior lighting shall be Building Code compliant and comply with Section 20-30.080 (Outdoor Lighting). Interior light systems shall be fully shielded, including adequate coverings on windows, to confine light and glare to the interior of the structure. (Santa Rosa, Cal., ORD-2017- 25, Chapter 20 § 46.80.

Cumulative Impacts

There are no adverse cumulative environmental impacts to aesthetic resources resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to aesthetic resources have been identified; therefore, no mitigation is required.

II AGRICULTURAL & FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department 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 (CalFire) 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.

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project 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. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	■
c. Would the project 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. Would the project result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Would the project 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 Setting

The project location is surrounded by a combination of Commercial General (CG) and Industrial Light (IL) zoning designations (see Figure XI-2 in the Land Use and Planning section). Land uses surrounding the project include commercial and light industrial uses. The project location and its surroundings are entirely developed with nonagricultural uses.

REGULATORY SETTING

Farmland Mapping and Monitoring Program

Agricultural lands within the state of California are rated according to soil quality and irrigation status by the Farmland Mapping and Monitoring Program (FMMP). The FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. The best quality land is called Prime Farmland, followed by Unique Farmland, Farmland of Statewide Importance, and so on, in decreasing order of importance. The maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance.

The project area is designated as Urban and Built-up Land, as shown on Figure II-1.

Williamson Act

Agricultural land in the project area may also be subject to the California Land Conservation Act of 1965, more commonly referred to as the Williamson Act. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are lower than normal because they are based on farming and open space uses as opposed to full market value.

Analysis

- a. **Would the project 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?**

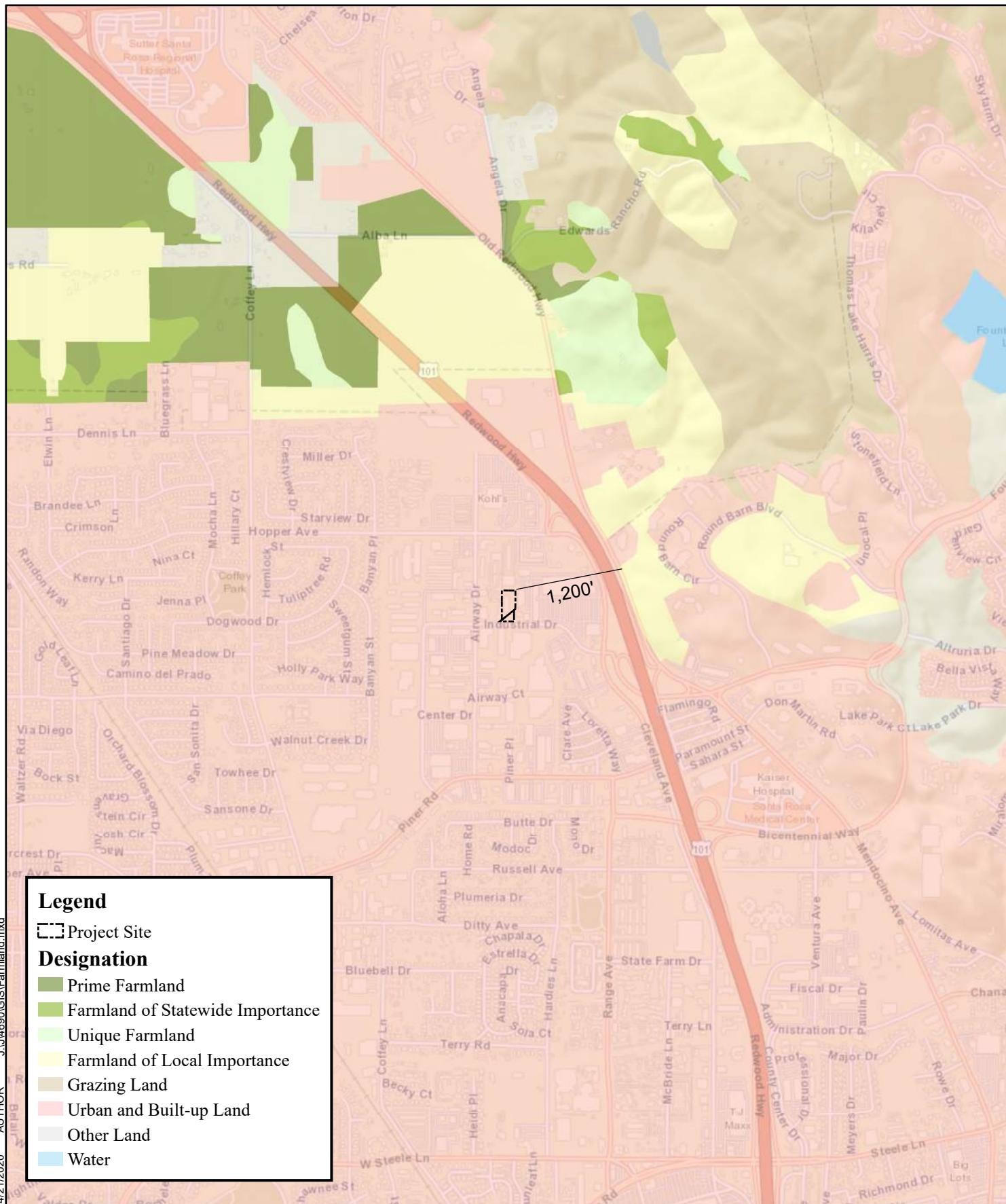
As shown on Figure II-1, the Farmland Mapping and Monitoring Program⁵ designates the project site and surrounding areas as Urban and Built-up Land. The project site is already developed and would be repurposed partially for cannabis production. The nearest designated Farmland is approximately 1,200 feet to the northeast. The project would not convert Farmland to non-agricultural uses.

- b. **Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

Zoning designations in the project area do not support agricultural uses and there are no Williamson Act contracts in the project vicinity. The project would not remove any land from agricultural production and would therefore not conflict with agricultural zoning or Williamson Act contracts.

⁵ *Sonoma County Important Farmland—2016*. Farmland Mapping and Monitoring Program of the California Resources Agency.

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AUTHOR
4/21/2020



Legend

Project Site

Designation

- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Farmland of Local Importance
- Grazing Land
- Urban and Built-up Land
- Other Land
- Water

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
California Dept. of Conservation (2016)

NORTH

0 375 750 1,500 Feet

**FIGURE II-1
IMPORTANT FARMLAND**

**CITY OF SANTA ROSA
MARCH 2020**

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

Forest land, as defined by the U.S. Forest Service, includes land at least ten percent of which is stocked by trees of any size, or land formerly having had such tree cover that would be naturally or artificially regenerated. Forest land includes transition zones, such as areas between heavily forested and non-forested lands that are at least ten percent stocked with forest trees and forest areas adjacent to urban and built-up lands.

The project does not propose any activities related to timber harvest nor would it result in the conversion of forest land to non-forest uses. As such, there would be no impact to forest land or conversion of designated land to non-forest uses. The project locations are not zoned for and do not currently support timberland nor are they zoned as timber production land by the City.

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

The project location does not currently support forest land and the project area is already developed and within the City limits. The proposed project would not result in any impact to forest land.

- e. **Would the project 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?**

The project would not impact agricultural resources in the project area or result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. The nearest designated Farmland is 1,200 feet to the northeast. There is no designated timberland within the City of Santa Rosa.

Cumulative Impacts

There are no adverse cumulative environmental impacts to agricultural and forestry resources resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to agricultural and forestry resources have been identified; therefore, no mitigation is required.

III 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:	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b. Would the project 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. Would the project expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	■
d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	■	☐	☐

Environmental Setting

BAY AREA AIR BASIN

The project is located in the San Francisco Bay Area Air Basin (BAAB) that consists of the counties surrounding the San Francisco Bay including portions of Sonoma and Solano Counties and all of Napa, Marin, San Francisco, San Mateo, Santa Clara, Alameda and Contra Costa Counties. The local air quality agency is the Bay Area Air Quality Management District (BAAQMD).

REGIONAL CLIMATE

Sonoma County's climate, like much of California, is Mediterranean in nature. Summers are warm and dry, and winters are cool and moist. Local climate variation is typical in Sonoma County. The Santa Rosa area typically has hot, dry summers and cool, wet winters. The average January high is 57 °F with an average low of 37 °F. July average high is 83 °F with an average low of 50, influenced by proximity to the San Francisco Bay and coastal fog. Rainfall predominantly occurs during the months of November through March. The normal historic rainfall average is approximately 32 inches annually.

Regulatory Setting

Air quality in the project vicinity is regulated by several jurisdictions, including EPA, ARB, and BAAQMD. These entities, described below, develop rules, regulations, and policies to attain the goals or directives imposed upon them through legislation.

FEDERAL REGULATIONS

The Clean Air Act

The Federal Clean Air Act (FCAA) required the US EPA to establish National Ambient Air Quality Standards (NAAQS) and also set deadlines for their attainment. Two types of NAAQS have been established: primary standards, which protect public health, and secondary standards, which protect public welfare from non-health-related adverse effects, such as visibility restrictions. The FCAA also required each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The federal Clean Air Act Amendments of 1990 (CAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. The US EPA has responsibility to review all state SIPs to determine conformance to the mandates of the FCAA, and the amendments thereof, and determine if implementation would achieve air quality goals. If the US EPA determines a SIP to be inadequate, a Federal Implementation Plan (FIP) may be prepared for the nonattainment area that imposes additional control measures. Failure to submit an approvable SIP or to implement the plan within the mandated time frame may result in sanctions being applied to transportation funding and stationary air pollution sources in the air basin.

STATE REGULATIONS

California Clean Air Act

The California Air Resources Board (CARB) is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act of 1988. The California Clean Air Act (CCAA) requires that all air districts in the state endeavor to achieve and maintain California Ambient Air Quality Standards (CAAQS) for ozone, CO, sulfur dioxide (SO₂), and nitrogen dioxide (NO₂) by the earliest practical date. The CCAA specifies that districts focus particular attention on reducing the emissions from transportation and area-wide emission sources, and the act provides districts with authority to regulate indirect sources. Each district plan is required to either (1) achieve a five percent annual reduction, averaged over consecutive three-year periods, in district-wide emissions of each nonattainment pollutant or its precursors, or (2) provide for implementation of all feasible measures to reduce emissions. Any planning effort for air quality attainment would thus need to consider both state and federal planning requirements.

LOCAL REGULATIONS

Bay Area Air Quality Management District

The BAAQMD is designated by law to adopt and enforce regulations to achieve and maintain ambient air quality standards. The BAAQMD was the first regional agency created by the state in 1955 that regulates stationary sources of air pollution within the BAAB. The District also regulates a variety of other programs such as Spare the Air, state Air Toxic Control Measures (ATCMs) and federal New Source Performance Standards (NSPSs) and open burning. The main purpose of the BAAQMD is to enforce local, state, and federal air quality laws, rules, and regulations in order to maintain the ambient air quality standards (AAQSs) and protect the public from air toxics through local, CARB ATCM, and federal EPA NESHAP-specific control regulations.

Because the BAAB is not an attainment area for all state and federal criteria pollutants, the BAAQMD is required to update its Clean Air Plan. The most recent update is the 2017 Clean Air Plan⁶. The BAAQMD provides the following summary of the Clean Air Plan:

The 2017 Plan provides a regional strategy to protect public health and protect the climate. To protect public health, the plan describes how the Air District will continue our progress toward attaining all state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the plan defines a vision for transitioning the region to a post-carbon economy needed to achieve ambitious greenhouse gas reduction targets for 2030 and 2050, and provides a regional climate protection strategy that will put the Bay Area on a pathway to achieve those GHG reduction targets.

The 2017 Plan includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such as particulate matter, ozone, and toxic air contaminants; to reduce emissions of methane and other “super-GHGs” that are potent climate pollutants in the near-term; and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

CRITERIA POLLUTANTS

Pollutants subject to federal ambient standards are referred to as “criteria” pollutants because the US EPA publishes criteria documents to justify the choice of standards. California and Federal standards for criteria pollutants for the year 2017 are shown below.

Pollutant	Averaging Time	State Standard	Federal Primary Standard
Ozone	1-Hour 8-Hour	0.09 ppm 0.07 ppm	-- 0.070 ppm
PM10	Annual 24-Hour	20 ug/m ³ 50 ug/m ³	-- 150 ug/m ³
PM2.5	Annual 24-Hour	12 ug/m ³ ---	12 ug/m ³ 35 ug/m ³
Carbon Monoxide	8-Hour 1-Hour	9.0 ppm 20.0 ppm	9.0 ppm 35.0 ppm
Nitrogen Dioxide	Annual 1-Hour	0.03 ppm 0.18 ppm	.053 ppm 100 ppb
Sulfur Dioxide	24-Hour 3-Hour 1-Hour	0.04 ppm -- 0.25 ppm	.14ppm -- 75 ppb
Lead	30-Day Avg. Calendar Quarter 3-Month Avg.	1.5 ug/m ³ -- --	-- 1.5 ug/m ³ 0.15 ug/m ³

ppm = parts per million

⁶ 2017 Clean Air Plan: Spare the Air, Cool the Climate. BAAQMD. April 9, 2017.

ppb = parts per billion

ug/m³ = micrograms per cubic meter

MONITORING STATION DATA

Ambient air quality measurements are routinely conducted at nearby air quality monitoring stations. The nearest monitoring station to the project is located in Santa Rosa. Both CARB and the US EPA use this type of monitoring data to designate areas according to attainment status for criteria air pollutants established by the agencies. The purpose of these designations is to identify those areas with air quality problems and thereby initiate planning efforts for improvements. The three basic designation categories are nonattainment, attainment, and unclassified. Unclassified is used in an area that cannot be classified on the basis of available information as meeting or not meeting the standards. In addition, the California designations include a subcategory of the nonattainment designation, called nonattainment-transitional. The nonattainment-transitional designation is given to nonattainment areas that are progressing and nearing attainment.

The BAAB is currently designated as nonattainment for several state and national ambient air quality standards shown below.

Standard	2017 State Status ⁷	2018 Federal Status
Ozone 8-Hour	Nonattainment	Nonattainment
Ozone 1-Hour	N/A	N/A
PM2.5	Nonattainment	Nonattainment
PM10	Nonattainment	Unclassified
Carbon Monoxide	Attainment	Unclassified/Attainment
Nitrogen Dioxide	Attainment	Unclassified/Attainment
Sulfur Dioxide	Attainment	Unclassified/Attainment
Sulfates	Attainment	N/A
Lead	Attainment	Unclassified/Attainment
Hydrogen Sulfide	Unclassified	N/A
Visibility Reducing Particles	Unclassified	N/A

Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The project site is within the BAAQMD. The project would not conflict with or obstruct the BAAQMD's 2017 Clean Air Plan, intended to provide an integrated control strategy to reduce ozone, particulate matter (PM), toxic air contaminants, and greenhouse gases. The project proposes repurposing the existing building from a retail furniture store/warehouse to a cannabis microbusiness without retail sales. Because the project is a small scale microbusiness proposed to be located in an

⁷ <http://www.arb.ca.gov/design/adm/adm.htm>

existing building and does not include public retail sales (only employees and vendors will travel to the site), the project will not increase trips to/from the project area that would result in significantly increased vehicular emissions. The traffic report⁸ for the project indicates there would be a net reduction of 80 trips per day between the existing and proposed use.

Because the project will not directly increase on-going emissions of monitored air pollutants and will not impact the area's attainment status, any impact to the BAAQMD's Clean Air Plan, and Ozone Strategy would be less than significant.

b. Would the project 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?

The BAAQMD is responsible for monitoring and reporting air quality data for the county within the BAAB. Both the U. S. Environmental Protection Agency and the California Air Resources Board have established ambient air quality standards for common pollutants. These ambient air quality standards represent safe levels that avoid specific adverse health effects associated with each pollutant, termed criteria pollutants. The BAAB is currently designated as nonattainment for several state and national ambient air quality.

The BAAQMD provides useful guidance in assessing project impacts on attainment status. The BAAQMD's 2017 Air Quality Guidelines⁹ establish recommended thresholds of significance for criteria pollutants for project construction and operation for CEQA analysis. The Air Quality Guidelines also provide screening levels to determine if it is necessary to conduct an analysis of potential project-related air quality impacts.

Assessment of construction-related impacts are not necessary due to the building's existence and only minor modifications to it. For potential operational air quality impacts, the BAAQMD screening levels for light industrial and manufacturing land uses contained in Table 3-1 of the Air Quality Guidelines are shown below.

Land Use Type	Operational Criteria Pollutant Screening Size (square feet)	Operational GHG Screening Size (square feet)	Construction-Related Screening Size (square feet)
General Light Industry	541,000	121,000	259,000
Manufacturing	992,000	89,000	259,000

The proposed division of interior 19,500 square-foot space within the existing building for the project includes the following:

Use	Square Feet
Cultivation	9,927 and 216 storage
Manufacturing	3,282
Distribution	1,165
Ancillary	4,910

⁸ T&L Industrial Cannabis Project Letter Report. Transpedia Consulting Engineers. August 20, 2019.

⁹ California Environmental Quality Act Air Quality Guidelines. Bay Area Air Quality Management District. May 2017.

None of the proposed uses individually or collectively approach the screening levels established by the BAAQMD. The project is therefore not required to undergo an air quality analysis and is considered to have a less than significant impact to criteria pollutants.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

The nearest potential sensitive receptors are residential uses to the northwest, west and south, all of which are greater than one-quarter mile away. The project will not expose sensitive receptors to substantial pollution concentrations. Sources of pollution from the project would include vehicle emissions and odors (discussed below). Vehicle emissions would be lower than those experienced under the current use of the building that includes retail furniture sales and deliveries.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The project would include cultivation, processing and storage of cannabis. The project applicant retained Burke Mechanical Engineering to prepare an odor mitigation plan¹⁰ that was submitted to the City with the application package. Burke Mechanical Engineering concluded that the project will be consistent with the City's Cannabis Ordinance provided the recommended measures in the study are included in the project. Mitigation Measure AQ1 requires the City to include those recommendations in the project conditions of approval.

Cumulative Impacts

There are no adverse cumulative environmental impacts to air quality resulting from implementation of the proposed project.

Mitigation Measures

AQ1

The City shall ensure that all measures contained in the August 2019 Odor Control Study prepared by Burke Mechanical Engineering are incorporated into the project conditions of approval.

¹⁰ *Odor Control Study, 3515 Industrial Drive*. Burke Mechanical Engineering. August 2019.

IV BIOLOGICAL RESOURCES

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	☐	☐	☐	■
b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	■
c. Would the project 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. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	■
e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	■
f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

Setting

There are no special status biological communities present at the project site. There are no special status plant or animal species present at the project site. There is no riparian, aquatic or wetland habitat at the project site. The site has been completely developed with a building, parking and landscaping and occurs within a commercial/light industrial area since 2004. Landscape trees and bushes provide some shelter for local bird species but there are no other biological resources of note at the project site or in the project area.

Analysis

- a. **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?**

Based on the developed and maintained nature of the site and lack of habitat suitable for special status species, no federal or state listed species are likely to be present on the project site. The project occurs within a developed commercial site surrounded by developed commercial and light industrial uses. There are no special biological communities in the project area and no habitat at the project site. Similarly, the project site does not support any listed plant species based on its ongoing and continuous maintenance.

Typically, nesting birds would be a concern during project development. However, because the project would repurpose an existing building with only minor exterior modifications, there is no potential to disturb nesting birds and no trees would be removed by the project.

- b. **Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?**

No sensitive communities are present on the project site. The site is entirely developed and surrounded by commercial and light industrial uses.

- c. **Would the project 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?**

The project would not impact any riparian habitat or wetlands as no such habitat is present on the project site. No sensitive biological communities are present at the project site.

- d. **Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

The project site does not support wildlife nursery sites and is not representative of a wildlife migratory corridor. Because of the level of development in the project area and surrounding commercial and light industrial uses, the length of time the area has been developed, and continued intensive maintenance of the project area, the project area is not characteristic of a wildlife migratory corridor and does not support the use of wildlife species.

- e. **Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

The project does not conflict with local policies protecting biological resources. The project would not impact biological resources or trees as no biological resources are present and no trees would be removed.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project location is not part of an adopted Habitat Conservation Plan or Natural Community Conservation Plan.

Cumulative Impacts

There are no adverse cumulative environmental impacts to biological resources resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to biological resources have been identified; therefore, no mitigation is required.

V CULTURAL RESOURCES

Section 15064.5(a) of CEQA includes a broad definition of historical and archaeological resources as follows:

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).
- (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:
 - (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - (B) Is associated with the lives of persons important in our past;
 - (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
 - (D) Has yielded, or may be likely to yield, information important in prehistory or history.
- (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	■
b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	■
c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	■

Setting

The project site is completely developed with an existing building, parking areas and perimeter landscaping. Construction occurred in 2004. Because the project does not include ground disturbing work and is not historic, a cultural resources assessment was not considered to be necessary.

Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

City data indicates the building was constructed in 2004. There are no buildings or structures within the project site that would be considered to be a historical resource based on the relatively recent construction. Because no ground disturbing construction is anticipated or proposed, there would not be a risk of accidental discovery of historic resources, so no mitigation is required.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The project proposes to repurpose an existing building on a developed site. There are no known archaeological resources at the project site. Because no ground disturbing construction is anticipated or proposed, there would not be a risk of accidental discovery of archaeological resources, so no mitigation is required.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

There are no known human remains at the project site. The site is entirely developed. No ground disturbing activities are proposed so there is no potential for accidental discovery of human remains, no mitigation is required.

Cumulative Impacts

There are no adverse cumulative environmental impacts to cultural resources resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to cultural resources have been identified; therefore, no mitigation is required.

VI ENERGY

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	■	☐
b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	■

Setting

The California Energy Commission (Energy Commission) was charged with developing the state's Renewable Energy Program in 1998, following deregulation of electric utilities. The Energy Commission provides a brief history of its actions with regard to the Renewable Energy Program:

In 2002, California established its Renewables Portfolio Standard (RPS) Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent by 2017. The Energy Commission's 2003 Integrated Energy Policy Report recommended accelerating that goal to 2010, and the 2004 Energy Report Update urged increasing the target to 33 percent by 2020. Governor Schwarzenegger, the Energy Commission, and the California Public Utilities Commission (CPUC) endorsed this enhanced goal for the state as a whole. Achieving these renewable energy goals became even more important with the enactment of AB 32 (Núñez, Chapter 488), the California Global Warming Solutions Act of 2006. This legislation sets aggressive greenhouse gas reduction goals for the state and its achievements will depend in part on the success of renewable energy programs.

SBX1-2 was signed by Governor Edmund G. Brown, Jr., in April 2011 to codify the ambitious 33 percent by 2020 goal. In his signing comments, Governor Brown noted that "This bill will bring many important benefits to California, including stimulating investment in green technologies in the state, creating tens of thousands of new jobs, improving local air quality, promoting energy independence, and reducing greenhouse gas emissions."

This new RPS applied to all electricity retailers in the state including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must adopt the new RPS goals of 20 percent of retail sales from renewables by the end of 2013, 25 percent by the end of 2016, and the 33 percent requirement being met by the end of 2020.

In October 2015, Governor Brown signed Senate Bill 350 to codify ambitious climate and clean energy goals. One key provision of SB 350 is for retail sellers and publicly

owned utilities to procure “half of the state’s electricity from renewable sources by 2030.”¹¹

These goals were accelerated in 2016 with passage of SB 32 requiring lowering greenhouse gas emissions to 40 percent below 1990 levels by 2030. Further, “In 2018, Senate Bill 100...set a planning target of 100 percent zero-carbon electricity resources by 2045 and increased the 2030 renewables target from 50 percent to 60 percent. On the same day of signing SB 100, then-Governor Brown signed Executive Order B-55-18 with a new statewide goal to achieve carbon neutrality (zero-net GHG emissions) by 2045 and to maintain net negative emissions thereafter. The executive order covers all sectors of the economy¹².”

Today, California’s energy policies are intertwined with goals of reducing greenhouse gases. The Energy Commission produces the biennial Integrated Energy Policy Report. The report contains an integrated assessment of major energy trends and issues facing California’s electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state’s economy; and protect public health and safety. The most recent report was divided into two sections. Volume I was produced in 2018 and Volume II was released in February 2019¹³.

CURRENT ENERGY USAGE AND SOURCES

California uses the least electricity of any state with a 2016 (most recent electricity California Energy Commission date) usage of 6,536 kWh per capita¹⁴. The census states that Sonoma County had an estimated population of 499,942 in 2017¹⁵ and the California Energy Commission indicates the Sonoma County used a total (residential and non-residential) of 3039.184630 gigawatt hours (GWh) of electricity in 2017¹⁶ for a per capita use of 6,079 kWh, somewhat below the state average.

Sonoma County is provided electricity by Sonoma Clean Power, a community choice aggregation, over PG&E maintained infrastructure. As of 2018, Sonoma Clean Power’s power mix was ahead of California’s goal and supplied 45 percent of its electricity from renewable resources under the California Renewables Portfolio Standard. Additionally, in 2018, 42 percent of Sonoma Clean Power’s supply was hydroelectric, for a total of 87 percent greenhouse gas free electricity¹⁷. In contrast, the overall power mix in California is 29 percent renewable, 15 percent hydroelectric and nine percent nuclear, or 53 percent greenhouse gas free electricity. In 2018, total renewable electricity in California was 34 percent¹⁸. There is a potential for opting out of Sonoma Clean Power and instead purchasing power directly from PG&E. Similar to Sonoma Clean Power, PG&E acquired 86 percent of its power from greenhouse fee sources in 2018¹⁹.

¹¹ <https://www.energy.ca.gov/renewables/history.html>

¹² Ibid.

¹³ https://www.energy.ca.gov/2018_energy/policy/

¹⁴ https://www.energy.ca.gov/almanac/electricity_data/us_per_capita_electricity.html

¹⁵ <https://www.census.gov/quickfacts/fact/table/sonomacountycalifornia,US/PST045218>

¹⁶ <http://www.ecdms.energy.ca.gov/elecbycounty.aspx>

¹⁷ <https://sonomacleanpower.org/annual-report>

¹⁸ https://www.energy.ca.gov/2018publications/CEC-100-2018-001/Exec_Summary_CEC-100-2018-001-V2-CMF.pdf

¹⁹ https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page

Analysis

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The project applicant proposes to repurpose an existing building on an existing developed site. Very little energy would be utilized in the process of reconfiguring interior space.

Operationally, indoor cannabis cultivation can be energy intensive. The project site is currently developed as a retail furniture store and provided with overhead fluorescent lighting (either T12 or T8). The project applicant has proposed the use of high efficiency LED lights for cultivation, representing an energy savings of approximately 45 percent over T12 (T12 lighting was phased out in 2012) lighting or 30 percent over T8 lighting²⁰. PG&E has found that converting florescent lighting to LED can reduce energy consumption by 43 percent²¹.

Replacement of existing light bulbs in the existing building would reduce current energy demands by 30 to 45 percent, allowing for additional growing lights within the existing energy budget. Additionally, use of LED lighting would reduce cooling loads associated with the building and the new HVAC system would be rated to current efficiency standards in place of the existing less efficient HVAC system.

It is reasonable to assume that some increase in energy demand would occur even with the lighting and HVAC replacement. The state recognizes cannabis as a useful and regulated product for medical treatment as well as recreation. Cannabis also contributes to the state and local economy through tax revenue and jobs. Use of energy for cannabis would therefore not be wasteful, inefficient or unnecessary and any impact would be less than significant.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As indicated previously, electricity to the project is currently provided by Sonoma Clean Power (or PG&E) which is exceeding the state's renewable energy goals. Additionally, all interior improvements would be required to meet the most current CalGreen energy standards, consistent with the state's energy efficiency goals.

Cumulative Impacts

There are no adverse cumulative environmental impacts to energy resulting from implementation of the proposed project.

²⁰ <https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/power-smart/guides-tips/fluorescent-led-comparison-chart.pdf>

²¹ <https://cltc.ucdavis.edu/sites/default/files/files/publication/TLED%20Benchmark%20Report%20-%20Final%202017-11-1.pdf>

Mitigation Measures

No adverse environmental impacts to energy have been identified; therefore, no mitigation is required.

VII GEOLOGY & SOILS

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project 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. Would the project result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c. Would the project 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. Would the project 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. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Environmental Setting

REGIONAL GEOLOGY AND TOPOGRAPHY

The project site is located within the northern Coast Ranges geomorphic province of California, generally characterized by a series of northwesterly trending, structurally controlled, elongated ridges and valleys. The City of Santa Rosa is largely located within the Santa Rosa Plain. The Santa Rosa Plain is generally flat and surrounded by the Coast Range to the east and west.

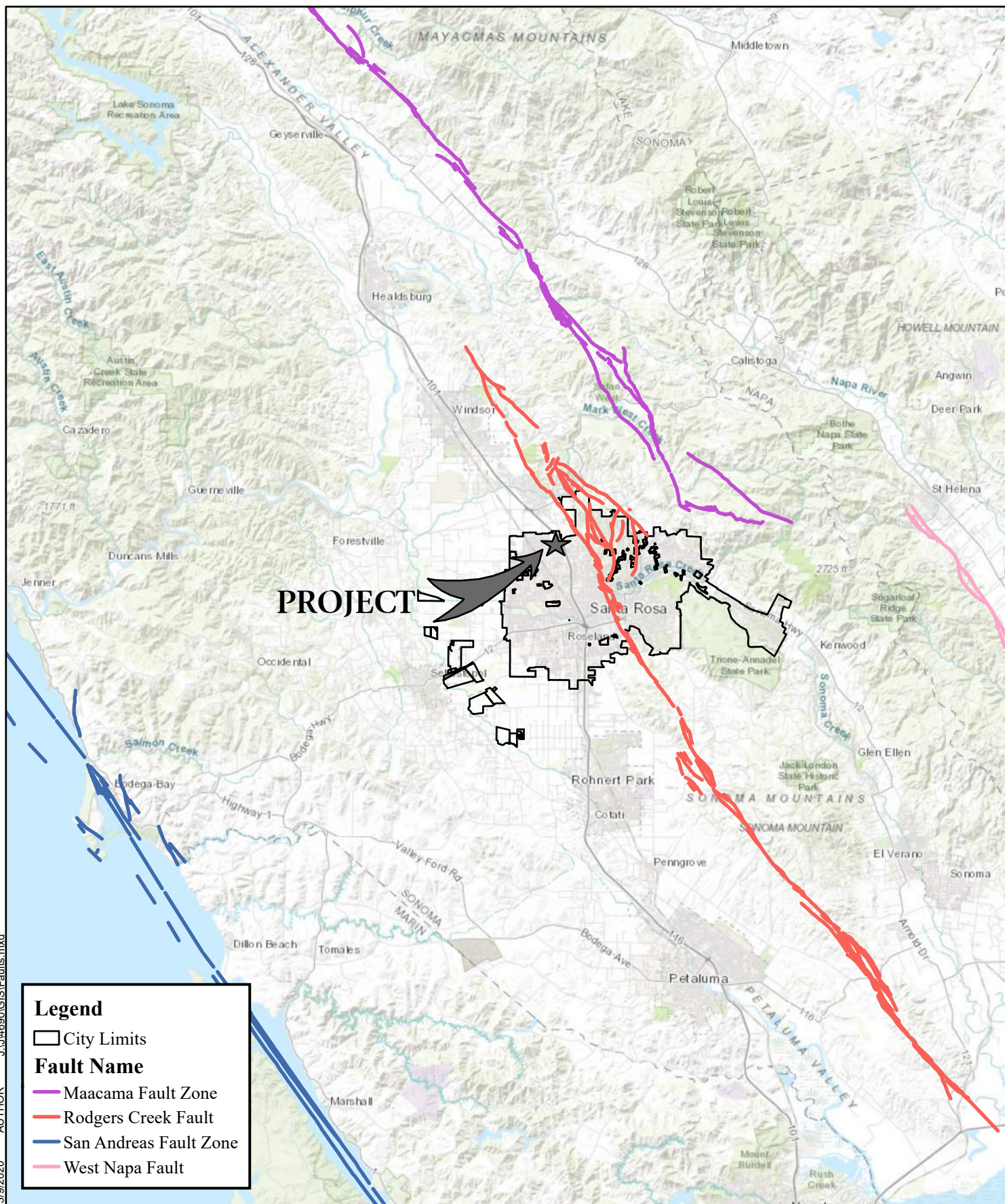
LIQUEFACTION

Liquefaction is the process where water is combined with unconsolidated soils, generally from ground motions and pressure, which causes the soils to behave like quicksand. Liquefaction potential is determined from a variety of factors including soil type, soil density, depth to the groundwater table, and the expected duration and intensity of ground shaking. Liquefaction is most likely to occur in deposits of water-saturated alluvium or areas of considerable artificial fill.

SEISMIC CONDITIONS

Similar to all of Sonoma County, the project area is within a seismically active area. The nearest faults considered to be 'Holocene-active' (experiencing surface rupture within about the last 11,000 years) are shown below and on Figure VII-1; other faults in the project area are considered to be in the 700,000 to two million year old range and considered less likely to result in seismic activity. These faults have the potential to produce earthquakes in the project area.

Fault	Approximate Distance to Fault (miles)	Direction to Fault
Rogers Creek Fault	1	Northeast
Maacama	5	Northeast
San Andreas	12	West
Konocti	27	Northeast



Legend

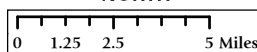
City Limits

Fault Name

- Maacama Fault Zone
- Rodgers Creek Fault
- San Andreas Fault Zone
- West Napa Fault

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
 Projection: Lambert Conformal Conic
 Datum: North American 1983
 Units: Foot US

Data Source Information:
 USGS (2019)



**FIGURE VII-1
 EARTHQUAKE FAULTS**

**CITY OF SANTA ROSA
 MARCH 2020**

Regulatory Setting

FEDERAL REGULATIONS

Clean Water Act 402 and National Pollutant Discharge Elimination System

The CWA is discussed in detail in the Hydrology and Water Quality section of this document. However, because CWA Section 402 is directly relevant to excavation, additional information is provided below. Amendments in 1987 added Section 402p to establish a framework for regulating municipal and industrial stormwater discharges under National Pollutant Discharge Elimination System (NPDES) program. The EPA has delegated to the State Water Resources Control Board (SWRCB) the authority for the NPDES program in California, which is implemented by the state's nine regional water quality control boards. Under the NPDES Phase II Rule, construction activity disturbing one acre or more must be permitted under the state's General Construction Permit. General Construction Permit applicants are required to prepare a Notice of Intent and a Stormwater Pollution Prevention Plan (SWPPP) and implement and maintain Best Management Practices (BMPs) to avoid adverse effects on receiving water quality as a result of construction activities, including earthwork.

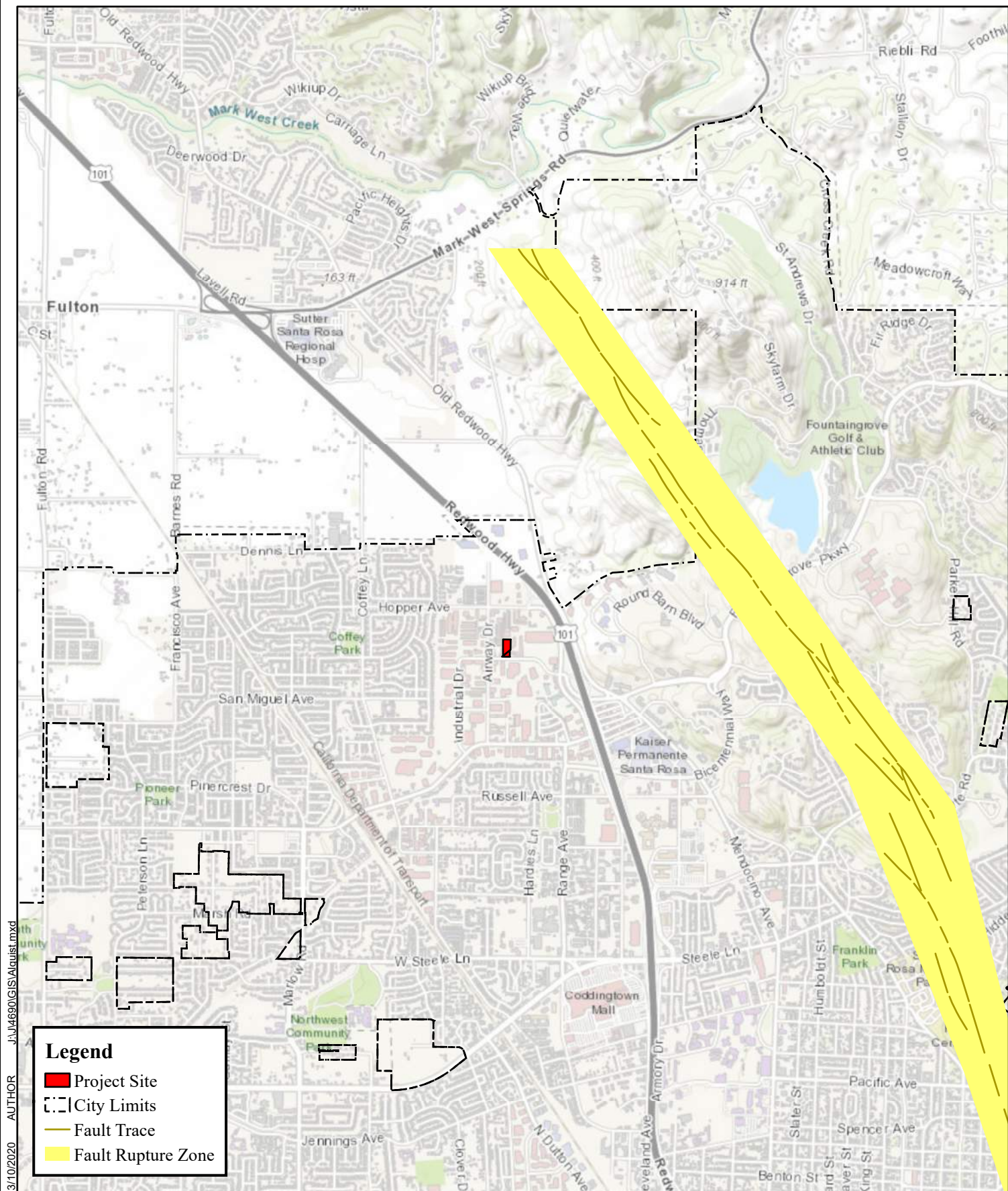
STATE REGULATIONS

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 (prior to January 1, 1994, known as the Alquist-Priolo Special Studies Zones Act – CCR, Title 14, Section 3600) sets forth the policies and criteria of the State of California in regards to building within active fault zones mapped pursuant to the Act. The Alquist-Priolo Earthquake Fault Zoning Act outlines cities' and counties' responsibilities in prohibiting the location of developments and structures for human occupancy across the trace of active faults. The policies and criteria are limited to potential hazards resulting from surface faulting or fault creep within Earthquake Fault Zones delineated on maps officially issued by the State Geologist. Figure VII-2 shows the project relative to the nearest mapped fault zone.

Seismic Hazard Mapping Act

Like the Alquist-Priolo Act, the Seismic Hazards Mapping Act of 1990 (PRC 2690 2699.6) is intended to reduce damage resulting from earthquakes. The Seismic Hazards Mapping Act addresses earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. The state is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards, and cities and counties are required to regulate development within mapped Seismic Hazard Zones. Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Specifically, cities and counties are prohibited from issuing development permits for sites in Seismic Hazard Zones until appropriate site-specific geologic or geotechnical investigations have been carried out, and measures to reduce potential damage have been incorporated into the development plans.



Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
 Projection: Lambert Conformal Conic
 Datum: North American 1983
 Units: Foot US

Data Source Information:
 Dept. of Conservation (2018)

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 1775 Redwood Blvd., Suite 120, Santa Rosa, CA 95403

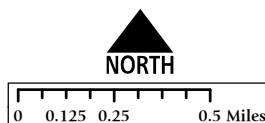


FIGURE VII-2
ALQUIST PRIOLO ZONES

CITY OF SANTA ROSA
 MARCH 2020

California Building Code

The California Code of Regulations, Title 24, also known as the California Building Standard Code or the California Building Code (CBC), establishes guidance for foundation design, shear wall strength, and other structurally related concerns. The CBC modified common building regulations for specific conditions found in California and included a large number of more detailed and/or more restrictive regulations. For example, CBC includes common engineering practices requiring special design and construction methods that reduce or eliminate potential expansive soil-related impacts. The CBC requires structures to be built to withstand ground shaking in areas of high earthquake hazards and the placement of strong motion instruments in larger buildings to monitor and record the response of the structure and the site of the seismic activity. Compliance with CBC regulations ensures the adequate design and construction of building foundations to resist soil movement. In addition, the CBC also contains drainage requirements in order to control surface drainage and to reduce seasonal fluctuations in soil moisture content.

Analysis

- a. **Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:**
 - a.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.**

The project would be not be located within an Alquist-Priolo Zone. As shown on Figure VII-2, the project is approximately 0.8 mile west of the nearest fault rupture zone. Any proposed improvements to the existing building would be required to implement California Building Code Seismic Design Category Requirements into the project design for applicable features to minimize hazards associated with potential fault rupture, ground shaking, and liquefaction. Based on incorporation of appropriate geotechnical design recommendations and engineering standards, the risk to the project from fault rupture is considered to be less than significant.

- a.ii. **Strong seismic ground shaking?**

The project location is subject to strong seismic ground shaking from earthquakes originating in surround faults shown on Figure VII-1. As indicated in a.i.) above, any proposed improvements to the building would be designed and constructed in strict adherence with current standards for earthquake-resistant construction, as is standard practice. Risk to the project is considered to be less than significant.

- a.iii. **Seismic-related ground failure, including liquefaction?**

As indicated in a.ii.) above, seismic ground shaking could occur in the project area. Any proposed building improvements would be designed and constructed in strict adherence with current standards for earthquake-resistant construction, as is standard practice. Risk to the project is considered to be less than significant.

a.iv. Landslides?

The project area is generally flat and not subject to landslides.

b. Would the project result in substantial soil erosion or the loss of topsoil?

The proposed project would repurpose an existing building on an already developed site. The project is located in a developed area of the City with an existing stormwater system consisting of roadside gutters draining to storm drains. Because the project site is already developed, no construction-related soil disturbance would occur and there is no need for permit coverage under the State Water Resources Control Board (SWRCB) Construction General Permit or the City's SUSUMP program. Because the project would not require activities that could result in erosion, there would be no impact.

c. Would the project 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?

The project proposes to repurpose an existing building. Any proposed building improvements would be designed and constructed in strict adherence with current standards. Risk to the project is considered to be less than significant.

d. Would the project 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?

The project proposes to repurpose an existing building. Any proposed building improvements would be designed and constructed in strict adherence with current standards. Risk to the project is considered to be less than significant.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Wastewater service in the project area and to the existing building is provided by the City. No septic systems are required.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are no known paleontological resources or unique geologic features in the project area. Because the project proposes to repurpose an existing building, no ground disturbing activities are proposed so the project would not impact paleontological resources even if present.

Cumulative Impacts

There are no adverse cumulative environmental impacts to geology and soils resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to geology and soils have been identified; therefore, no mitigation is required.

VIII GREENHOUSE GAS EMISSIONS

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b. Would the project Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

To fully understand global climate change it is important to recognize the naturally occurring “greenhouse effect” and to define the greenhouse gases (GHG) that contribute to this phenomenon. The temperature on Earth is regulated by this “greenhouse effect,” which is so named because the Earth’s atmosphere acts like a greenhouse, warming the planet in much the same way that an ordinary greenhouse warms the air inside its glass walls. Like glass, the gases in the atmosphere let in light yet prevent heat from escaping.

Greenhouse gases are naturally occurring gases such as water vapor, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) that absorb heat radiated from the Earth’s surface. Greenhouse gases are transparent to certain wavelengths of the Sun’s radiant energy, allowing them to penetrate deep into the atmosphere or all the way to Earth’s surface. Clouds, ice caps, and particles in the air reflect about 30 percent of this radiation, but oceans and land masses absorb the rest (70 percent of the radiation received from the Sun) before releasing it back toward space as infrared radiation. The greenhouse gases and clouds effectively prevent some of the infrared radiation from escaping; they trap the heat near the Earth’s surface where it warms the lower atmosphere.

In addition to natural sources, human activities are exerting a major and growing influence on climate by changing the composition of the atmosphere and by modifying the land surface. Particularly, the increased consumption of fossil fuels (natural gas, coal, gasoline, etc.) has substantially increased atmospheric levels of greenhouse gases. Measured atmospheric levels of certain greenhouse gases such as CO₂, NH₄, and N₂O have risen substantially in recent decades. This increase in atmospheric levels of greenhouse gases unnaturally enhances the “greenhouse effect” by trapping more infrared radiation as it rebounds from the Earth’s surface and thus trapping more heat near the Earth’s surface.

California Implications

In 2016, CARB published the 2016 California GHG Emissions Inventory, a review and analysis of GHG emissions from 2000 to 2014. According to the report, in 2014, total California GHG emissions were 441.5 million metric tons of CO₂ equivalent (MMT_{CO2e}), a decrease of 2.8 MMT_{CO2e} compared to 2013. This represents an overall decrease of 9.4 percent since peak levels in 2004. During the 2000 to 2014 period, per capita GHG emissions in California have continued to drop from a peak in 2001 of 13.9 tons per person to 11.4 tons per person in 2014; an 18 percent decrease²². State regulations have begun lowering California’s

²² https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2014/ghg_inventory_trends_00-14_20160617.pdf

GHG contribution to global GHG levels, but managing GHG emissions remains an ongoing priority in California.

State Regulations

CLIMATE CHANGE REGULATORY FRAMEWORK

In September 2006, Governor Arnold Schwarzenegger signed AB 32, the California Global Warming Solutions Act, which created a comprehensive, multi-year program to reduce GHG emissions in California. AB 32 required CARB to develop a Scoping Plan, adopted in 2008, that describes the approach California will take to reduce GHGs to achieve the goal of reducing emissions to 1990 levels by 2020. The Scoping Plan recognizes that local GHG reduction commitments and climate action plans are essential to the state meeting its targeted emissions reductions. In 2016, the Legislature passed SB 32, which codified a 2030 GHG emissions reduction target of 40 percent below 1990 levels by 2030. The Scoping Plan was updated in 2017.

California's energy policies are intertwined with goals of reducing greenhouse gases. "In 2018, Senate Bill 100...set a planning target of 100 percent zero-carbon electricity resources by 2045 and increased the 2030 renewables target from 50 percent to 60 percent. On the same day of signing SB 100, then-Governor Brown signed Executive Order B-55-18 with a new statewide goal to achieve carbon neutrality (zero-net GHG emissions) by 2045 and to maintain net negative emissions thereafter. The executive order covers all sectors of the economy... Executive Order B-55-18 follows the spirit of what is required at a global scale to achieve the climate goals of the Paris Agreement, in which signatory nations worldwide agree to sufficiently reduce GHG emissions to avoid catastrophic climate change. This is also consistent with a special report by the Intergovernmental Panel on Climate Change, which found that to avoid catastrophic climate change, global carbon dioxide emissions must decline by about 45 percent below 2010 levels by 2030 and reach net zero by about 2050²³."

LOCAL REGULATIONS

CARB works with 35 air pollution districts in California to enforce air pollution regulations, including GHGs. Many metropolitan air pollution districts, cities, and counties have adopted Local Climate Action Plans consistent with CARB Scoping Plan goals. The City adopted its Climate Action Plan in 2012²⁴ to guide new development within the City consistent with its GHG reduction goals. The City subsequently adopted its Municipal Operations Climate Action Plan in 2013.

The City's Climate Action Plan follows both the State CEQA Guidelines and BAAQMD's guidelines by incorporating the standard elements of a Qualified GHG Reduction Strategy. Standard elements of a Qualified GHG Reduction Strategy include measures or a group of measures (including performance standards) that demonstrates with substantial evidence that, if implemented on a project-by-project basis, these measures would collectively achieve specified emissions levels. The City also developed the Santa Rosa CAP Checklist for New Development (Appendix E of the CAP) that includes required and optional measures for development projects to determine a project's compliance with the CAP. Projects that are determined to

²³ 2018 Integrated Energy Policy Report Update Volume II. California Energy Commission. January 2019.

²⁴ Climate Action Plan. City of Santa Rosa. June 5, 2012.

be compliant with the CAP Checklist for New Development are considered to be less than significant and do not require quantification of GHG emissions.

During the 2017 update to the BAAQMD's CEQA Air Quality Guidelines²⁵, the BAAQMD adopted applicable screening criteria contained in Table 3-1 of the Guidelines indicating categories and sizes of projects that would not exceed the 1,100 MT of CO₂e/yr GHG threshold of significance for project operations. Projects that do not fall under a Local Climate Action Plan but are within the limits established by Table 3-1 of the Guidelines do not need to quantify GHG emissions and are considered to have a less than significant impact. Projects exceeding those screening limits are required to quantify GHG emissions.

Analysis

a. **Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

The proposed project would result in the generation of GHG emissions during construction and operation. Construction activities would generate limited GHG emissions from worker trips, and material delivery and hauling—no heavy off-road construction equipment would be required. Construction GHG emissions are short-term and would cease once construction is complete. Operation of the proposed project would result in GHG emissions from onsite lighting, heating, and cooling of the building, as well as the treatment and transport of water and wastewater for the life of the project. Additionally, GHGs from operation would result from vehicle trips associated with workers and product distribution.

The City's Climate Action Plan follows both the State CEQA Guidelines and BAAQMD's guidelines by incorporating the standard elements of a Qualified GHG Reduction Strategy. Standard elements of a Qualified GHG Reduction Strategy include measures or a group of measures (including performance standards) that demonstrates with substantial evidence that, if implemented on a project-by-project basis, these measures would collectively achieve specified emissions levels. The GHG reduction measures included in the CAP demonstrate the City's ability to reach a GHG reduction target of 25% below 1990 levels, by year 2020. Emissions reductions contained in the CAP were also quantified for three other years: 2010, 2015 and 2035. Emissions reductions for 2010 demonstrated the emissions reduction progress that the City had already made by implementing measures of the CAP, while the 2015, 2020 and 2035 emissions reductions indicated the potential reductions that will be achieved by implementation of these measures over the next several years.

The BAAQMD's identified thresholds of significance for GHGs associated with land use development projects (i.e., the project) through the year 2020 are:

- annual emissions less than 1,100 metric tons per year (MT/yr) of CO₂e, or
- annual emissions of 4.6 MT CO₂e/service population/yr (residents + employees), or
- compliance with a qualified GHG Reduction Strategy

²⁵ *California Environmental Quality Act Air Quality Guidelines*. Bay Area Air Quality Management District. May 2017.

The BAAQMD has not yet updated their recommended GHG emissions thresholds to address target reductions past year 2020. However, consistent with current State directives (AB 32 and AB 398), the updated target is expected to require an additional 40% reduction in GHG emissions by year 2030. Applied to the BAAQMD 2020 service population threshold, this would equate to standard of 2.8 metric tons carbon dioxide equivalent (MTCO₂e) per year per service population, by year 2030. The Santa Rosa CAP calculated GHG emissions reductions with implementation of the CAP not just for comparison to the 2020 targets but also out to year 2035, to be consistent with the planning horizon of the General Plan. As summarized on page ES-7 of the CAP, implementation of the measures of the Santa Rosa CAP are expected to decrease GHG emissions to 2.3 MTCO₂e per person per year by year 2035. While this timeframe is five years after an assumed 2030 target threshold, the CAP notes that a reduction to 2.9 MTCO₂e per person per year in 2020, and with assumed steady reductions over time, it can be concluded that emissions would be below 2.8 MTCO₂e per person per year (or a 40% reduction below 2020 thresholds) by year 2030.

The Santa Rosa CAP demonstrates that it would meet the anticipated State 2030 GHG emissions reductions targets. If the project can demonstrate consistency with the Santa Rosa CAP, its impacts related to GHG emission by year 2030 would be considered less than significant and fully consistent with State GHG emissions reduction requirements, with no need to quantify project-specific emissions. This is consistent with BAAQMD guidelines related to the analysis of projects under the 2020 GHG emissions reduction targets, as applied to the updated 2030 targets.

To be determined in compliance with the CAP, all measures below are required in development projects, unless otherwise specified. If a project cannot meet one or more of the mandatory requirements, substitutions may be made at the discretion of the Community Development Director. The items required to be in compliance with the Santa Rosa CAP Checklist for New Development (Appendix E of the CAP) are included below, with a description of whether and how the project complies with each measure.

Santa Rosa CAP Appendix E—Required Compliance Items					
#	Description	Compliance			Discussion
		Complies	Noncompliant	N/A	
1.1.1	Comply with CALGreen Tier 1 Standards	X			Compliance occurs during building permit process
1.1.3	After 2020, all development will utilize net zero electricity			X	Project is not a development project, site is already developed
1.3.1	Install real-time energy monitors to track energy use	X			Included in Mitigation Measure GHG1
1.4.2	Comply with the City's tree preservation ordinance	X			No trees will be removed
1.4.3	Provide public & private trees in compliance with the Zoning Code			X	No changes to existing landscaping is proposed, trees already exist
1.5	Install new sidewalks and paving with high solar reflectivity materials			X	No new site work is proposed
4.1.2	Install bicycle parking consistent with regulations	X			Bicycle parking is included, per regulations
4.3.5	Encourage new employers of 50+ to provide subsidized transit passes			X	Proposed use does not meet 50+ threshold
5.2.1	Provide alternative fuels at new refueling stations			X	Proposed use is not a refueling station
6.1.3	Increase diversion of construction waste			X	Construction waste will be minor and diversion consistent with regulations
7.1.1	Reduce potable water use for outdoor landscaping			X	No alterations to existing landscaping or infrastructure proposed
7.1.3	Use water meters which track real-time water use	X			Included in Mitigation Measure GHG1
7.3.2	Meet on-site meter separation in locations with current or future recycled water capabilities			X	Project area is not in the vicinity of existing or proposed recycled water
9.1.3	Install low water use landscapes			X	No alterations to existing landscaping is proposed
9.2.1	Minimize construction idling time to 5 minutes or less			X	No off-road construction
9.2.2	Maintain construction equipment per manufacturer's specs			X	Contained in Mitigation Measure AQ1
9.2.3	Limit GHG construction equipment emissions by using electrified or alternative fuels			X	No heavy off-road construction equipment proposed; site already developed

With inclusion of Mitigation Measure GHG1, the project complies with all applicable items contained in the Santa Rosa CAP Checklist for New Development and is considered to be less than significant and consistent with the CAP. Because the project propose to reuse and existing developed site, many of the compliance items are not applicable (N/A).

Additionally, the traffic report²⁶ prepared for the project indicates that retail sales currently associated with the existing furniture store generate approximately 123 daily trips to the project location. Traffic associated with a permitted use under the existing zoning of general commercial could generate up to 736 trips per day. The proposed use and rezoning would result in approximately 43 trips, an 80 trip per day reduction under the existing use and a 693 trip reduction under other allowable uses based on the existing zoning designation. Because transportation is the largest emitter of GHGs in Santa Rosa (51 percent²⁷) and the County of Sonoma (53 percent²⁸), a net reduction in trips is beneficial to the overall GHG mitigation strategies.

Under the BAAQMD Air Quality Guidelines, quantification of construction related GHG impacts are not necessary due to the building's existence and only minor modifications to it. For potential operational GHG impacts, the BAAQMD screening levels for light industrial and manufacturing land uses contained in Table 3-1 of the Air Quality Guidelines are shown below.

Land Use Type	Operational Criteria Pollutant Screening Size (square feet)	Operational GHG Screening Size (square feet)	Construction-Related Screening Size (square feet)
General Light Industry	541,000	121,000	259,000
Manufacturing	992,000	89,000	259,000

As indicated in the Air Quality section, none of the proposed uses individually or collectively (19,500 interior square feet) approach the screening levels established by the BAAQMD. The project is therefore not required to undergo a GHG analysis and is considered to have a less than significant impact to GHGs.

The proposed project would not have significant impact to GHGs and the proposed rezone and General Plan amendment could actually reduce potential GHGs from other permitted uses of the site under current designations.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The City has adopted a Climate Action Plan. As described in a.) above, the project is considered to be consistent with the CAP. The rezoning and General Plan amendment could reduce potential vehicle trips allowed under existing designations and reduce transportation-associated GHG emissions, consistent with the Climate Action Plan. The proposed project would be subject to all CalGreen energy regulations and would reduce daily trips associated with the existing use by approximately 43 trips per day. The project would not conflict with the City's CAP, the BAAQMD's Air Quality Guidelines or the state's goals of reducing GHGs.

²⁶ T&L Industrial Cannabis Project Letter Report. Transpédia Consulting Engineers (TCE). August 20, 2019.

²⁷ <https://srcity.org/DocumentCenter/View/10762/Climate-Action-Plan-PDF?bidId=>

²⁸ <https://rcpa.ca.gov/data-and-reports/sonoma-county-greenhouse-gas-inventory/>

Cumulative Impacts

As indicated in a.) above, the project is consistent with the City's CAP and would be below screening levels that might result in a significant impact. Because the project would reduce daily vehicle trips compared to the existing use and would greatly reduce vehicle trips associated with potentially permitted uses, the project would not have a cumulative impact to GHGs.

Mitigation Measures

GHG1

To comply with the City's CAP Checklist for New Development, the project shall install real-time energy monitors to track energy use (Checklist Item 1.3.1) and use water meters which track real-time water use (Checklist Item 7.1.3).

IX HAZARDS & HAZARDOUS MATERIALS

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	■
b. Would the project 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. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	■
d. Would the project 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. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	■

Environmental Setting

The project occurs in a developed area of Santa Rosa surrounded by commercial and light industrial uses. Based on surrounding uses, it can be assumed that limited quantities of hazardous materials and hazardous waste are transported, stored and used/produced by surrounding businesses. Regulations of hazardous materials and hazardous waste transportation, storage and handling are complex and occur at the federal, state, county and local level. The California Division of Occupational Safety and Health (Cal/OSHA) has specific industry health and safety guidelines developed for the cannabis industry.

There are no known designated hazardous materials sites (pursuant to Government Code Section 65962.5) on or adjacent the proposed project. Sites listed on California's Geotracker system are shown on Figure IX-1. The nearest designated site is located at 3550 Industrial Drive related to a leaking underground fuel storage tank. The site was remediated and closed in 1993²⁹.

REGULATORY SETTING

Federal Regulations

Hazardous materials in the project area are subject to applicable federal regulations, including the Resource Conservation and Recovery Act and the Comprehensive Environmental Response, Compensation, and Liability Act. Other applicable federal regulations are contained primarily in CFR Titles 29, 40, and 49.

State Regulations

California regulations are as stringent as or more stringent than federal regulations. The EPA has granted the State of California primary oversight responsibility for administering and enforcing hazardous waste management programs. State regulations require planning and management to ensure that hazardous wastes are handled, stored, and disposed of properly to reduce risks to human and environmental health.

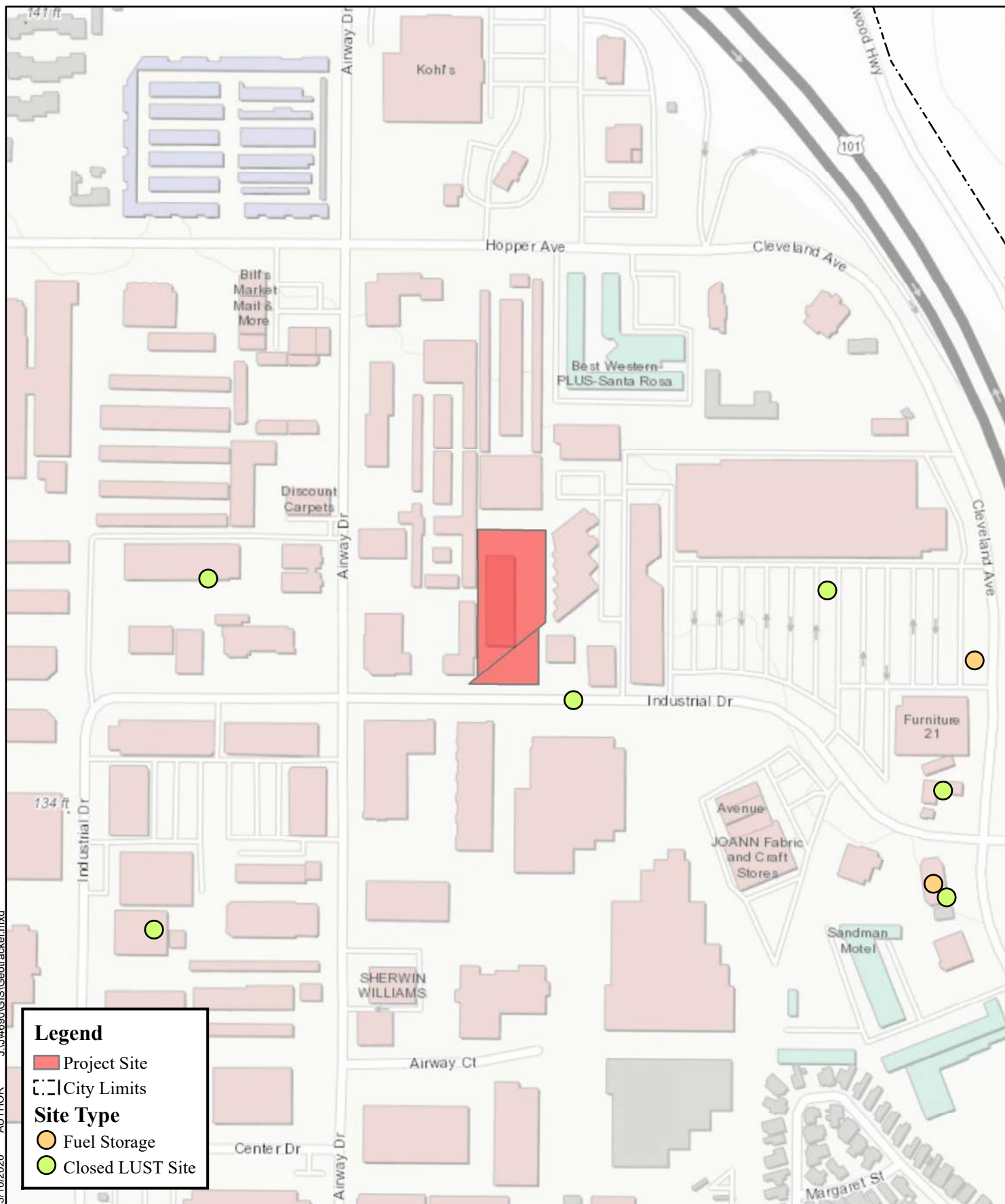
Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The project would repurpose an existing building as a cannabis microbusiness. The proposed project would be required to comply with all federal, state, and local regulations regarding the storage, handling, disposal, and cleanup of hazardous materials as part of its state and local operating permit. The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

²⁹ https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0609700665

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Legend

Project Site

City Limits

Site Type

Fuel Storage

Closed LUST Site

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
Water Resources Control Board, Geotracker (2020)

NORTH

0 75 150 300 Feet

FIGURE IX-1
HAZARDOUS MATERIALS

CITY OF SANTA ROSA
MARCH 2020

- b. Would the project 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?**

As indicated above, the project would be subject to all federal, state and local regulations related to hazardous materials as part of its operating permit. The project would not create a significant hazard related to hazardous materials.

- c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

There are no existing or proposed schools within one-quarter mile of the proposed project. The project site is surrounded by commercial and light industrial uses.

- d. Would the project 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?**

The proposed project is not on or adjacent to formally identified hazardous materials sites listed by the State Water Resources Control Board's GeoTracker system (that implements Government Code Section 65962.5) as shown on Figure IX-1. There are no listed sites within 500 feet of any of the proposed project components. The nearest designated site is located at 3550 Industrial Drive related to a leaking underground fuel storage tank. The site was remediated and closed in 1993. Because there is no ground disturbing work associated with the proposed project, any contamination that may have migrated away from the leaking tank would not be exposed by the project.

- 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?**

The nearest public use airport, Charles M. Schulz–Sonoma County Airport, is located approximately four linear miles northwest of the project site. The project is not located within the airport's airport land use plan area. Therefore, there would be no impact.

- f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The City prepared its Local Hazard Mitigation Plan (LHMP) in 2016 that assessed potential risks to the City³⁰. The LHMP identifies the City as being at high risk to seismic events, flood, drought and wildfire. Industrial Drive is not designated as an evacuation route in the LHMP. The Santa Rosa Fire Department and the Santa Rosa Police Department coordinate emergency response and evacuations based on the LHMP, nature of the emergency and coordination with the County of Sonoma, as required.

³⁰ *City of Santa Rosa Local Hazard Mitigation Plan*. City of Santa Rosa. October 2016.

Since the LHMP was adopted, the City has experienced two catastrophic wildfire events, the October 2017 Tubbs fire and the 2019 Kincadee fire. Additional information related to the wildfires is contained in the Wildfire section of this document.

The project would be served by the City's fire and police departments just as the current building is. Because the project would repurpose an existing building, there would not be any temporary construction-related impacts or long-term impacts to emergency response or evacuation.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The 2017 Tubbs Fire heavily impacted the project area but not the project site. While wildland fires are a risk in the project area, the project includes repurposing an existing building and will not expose people or structures to a significant risk of loss due to wildfires beyond existing conditions.

Cumulative Impacts

There are no adverse cumulative environmental impacts to or from hazards/hazardous materials resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to hazards and hazardous materials have been identified; therefore, no mitigation is required.

X HYDROLOGY & WATER QUALITY

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Would the project 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 a 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?	☐	☐	☐	☒
iv. impede or redirect flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Environmental Setting

SURFACE WATER

The proposed project site is located within the Russian River watershed. Piner Creek is the nearest large creek and flows through the project area approximately one-quarter mile north and west of the project site. There are numerous streams in the project area, as shown on Figure X-1. There are no designated wild or scenic rivers in the project area.

The surrounding project area is developed with commercial and light industrial uses and stormwater from impervious surfaces is directed to the existing City storm drain facilities. Stormwater in the project area is directed via the City's existing storm drain network to channelized creeks.

GROUNDWATER RESOURCES

The City's water supply is primarily from water stored in Lake Mendocino and Lake Sonoma and provided by Sonoma Water. The City also operates two groundwater wells to augment its supply. The proposed project does not include any new wells and does not introduce impervious surfaces as it repurposes an existing developed site. As shown on Figure X-2, the project is located above the Santa Rosa Plain Aquifer.

FLOODING

The project area is not designated as being at risk for flooding by FEMA, as shown on Figure X-3. None of the project area is located within designated flood zones.

Regulatory Setting

Clean Water Act

Important applicable sections of the federal CWA (33 USC 1251–1376) are identified below:

- Sections 303 and 304 provide water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the CWA. Certification is provided by the Regional Water Quality Control Board (RWQCB).
- Section 402 establishes the NPDES permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the RWQCB.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) is responsible for implementing the Clean Water Act and issues NPDES permits to cities and counties through regional water quality control boards. The project location is regulated by the North Coast Regional Water Quality Control Board (Regional Board).

The SWRCB has issued a statewide General Permit (Water Quality Order No. 99-08-DWQ) for construction activities within the state. The Construction General Permit (CGP) is implemented and enforced by the RWQCBs. The CGP applies to construction activity that disturbs one acre or more and requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that identifies best management practices (BMPs) to minimize pollutants from discharging from the construction site to the maximum extent practicable.

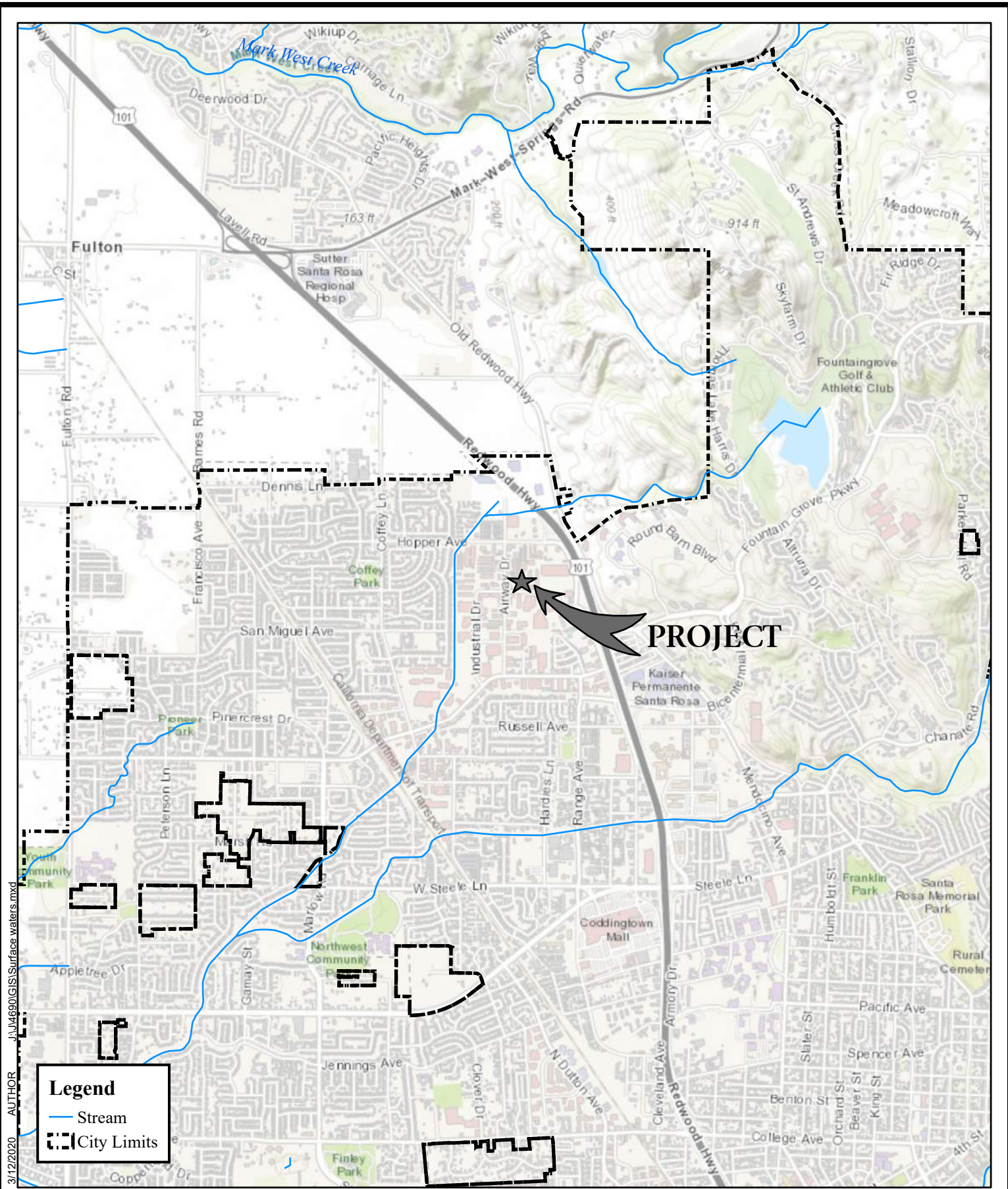
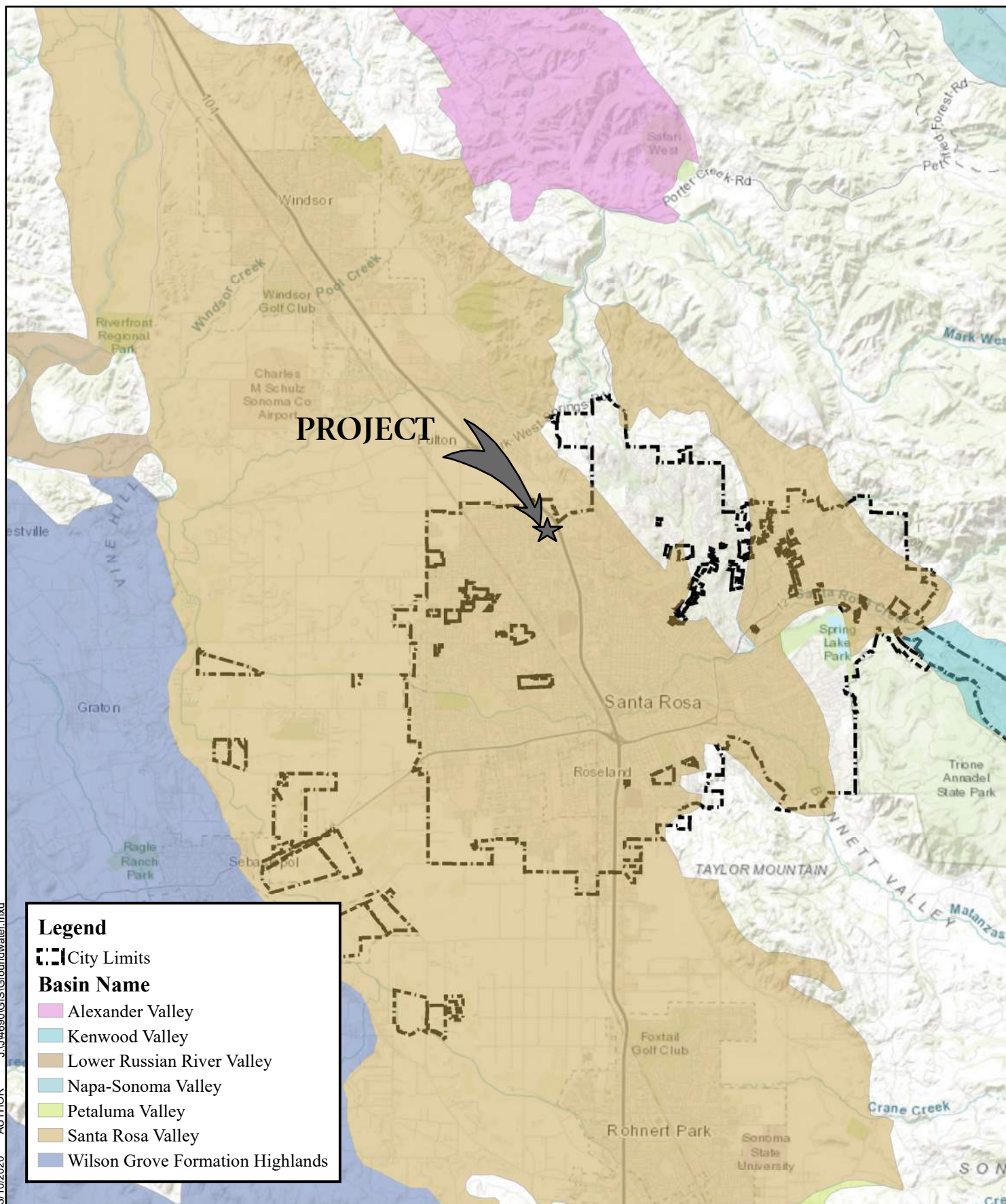


FIGURE X-1
SURFACE WATERS

CITY OF SANTA ROSA
 MARCH 2020

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AUTHOR
3/10/2020



Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
Department of Water Resources (2017)

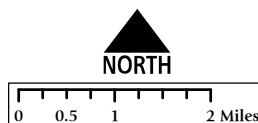
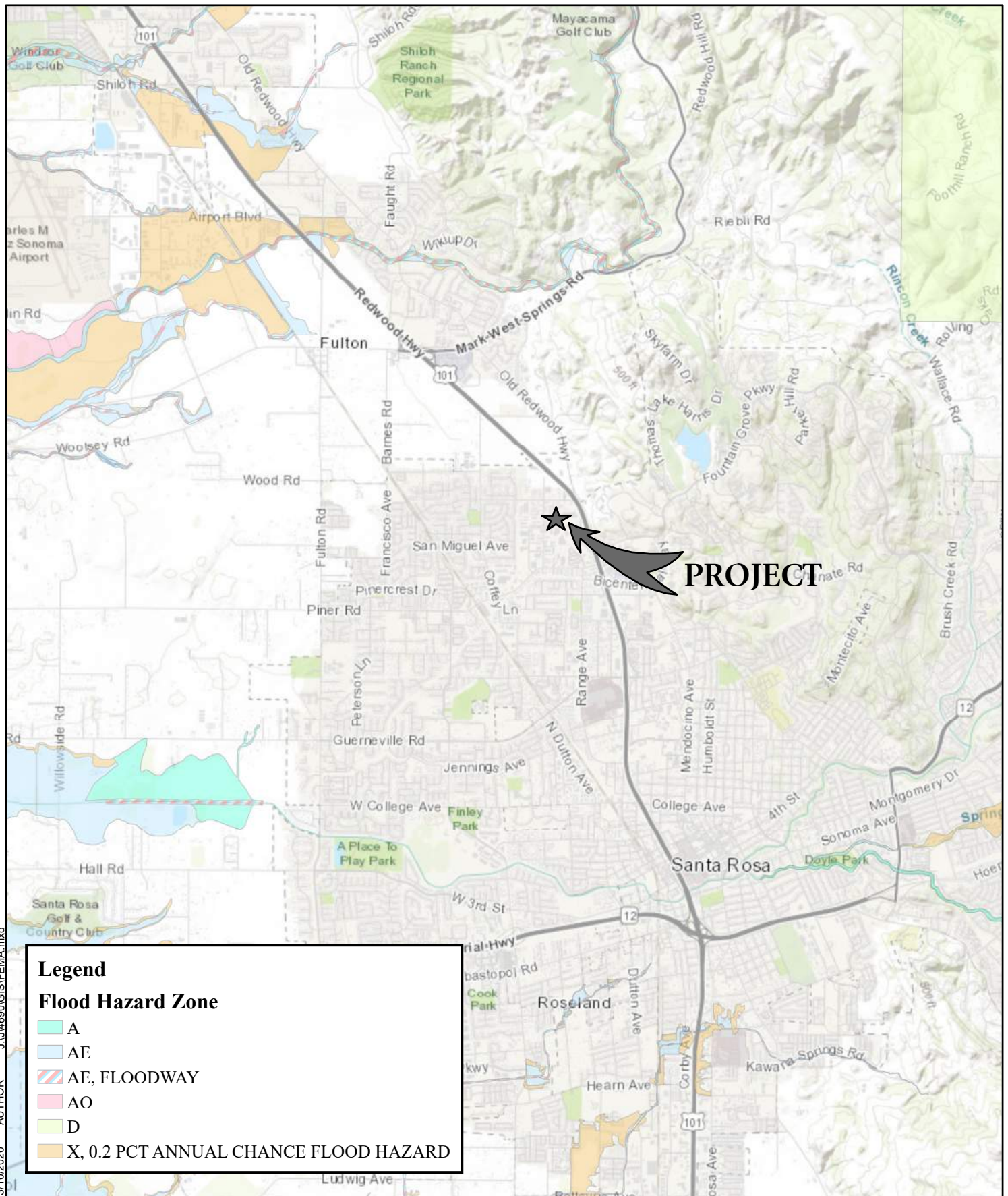


FIGURE X-2
GROUNDWATER BASINS

3/10/2020 AUTHOR J:\4690\GIS\FEMA.mxd



Legend

Flood Hazard Zone

- A
- AE
- AE, FLOODWAY
- AO
- D
- X, 0.2 PCT ANNUAL CHANCE FLOOD HAZARD

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
Flood Hazard: FEMA (2017)

NORTH

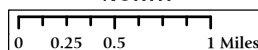


FIGURE X-3
FEMA

CITY OF SANTA ROSA
MARCH 2020

The SWRCB has also issued a statewide General Permit (Water Quality Order No. 97-03-DWQ) for regulating stormwater discharges associated with industrial activities. This General Permit requires the implementation of management measures that will achieve the performance standard of best available technology economically achievable and best conventional pollutant control technology. It also requires the development of a SWPPP, a monitoring plan, and the filing of an annual report.

Porter-Cologne Water Quality Act

The State of California's Porter-Cologne Water Quality Control Act (California Water Code, Section 13000 et seq.) provides the basis for water quality regulation in California. This Act requires a Report of Waste Discharge for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. Based on the report, the RWQCBs issue waste discharge requirements to minimize the effect of the discharge.

Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The project proposes to repurpose an existing developed site. Because the project would not include ground disturbing activities, there is no potential to cause construction-related violations of water quality standards. The project would not be subject to the City's SUSUMP requirements for post-construction stormwater treatment. However, the net reduction in vehicular traffic to the project site would result in a similar reduction of stormwater loading of pollutants associated with vehicles, a beneficial impact to surface waters.

The project would not include any activities that would result in the need for waste discharge requirements. The site would continue to be served by the existing storm drain system and no new facilities would be required.

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

The proposed project would repurpose an existing building and developed site that is already provided with municipal water service. The project is not growth inducing and would not impact existing demands or groundwater levels in the project area or elsewhere in any significant way. While cannabis cultivation can be water intensive, such use is encompassed in the City's municipal planning through the Cannabis Ordinance. The project does not introduce any new impervious surfaces and would not substantially interfere with groundwater recharge or groundwater basin management.

- c. Would the project 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:**

- c.i. result in a substantial erosion or siltation on- or off-site?**

The project would not alter the existing area drainage. No new impermeable surfaces would be introduced and no ground disturbing activities that could result in erosion or siltation would occur.

- c.ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?**

The project would not alter the course of a stream or river and would not alter the existing drainage pattern of the project area. The project would not substantially increase the rate or amount of existing surface runoff and would not result in on- or off-site flooding.

- c.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?**

The project would repurpose an existing developed site and would not introduce any new impervious surfaces that would impact local stormwater systems or result in substantial additional sources of polluted runoff.

- c.iv. Would the project impede or redirect flows?**

The project site is not within a mapped 100-year flood hazard area, as shown on Figure X-3. The project would not impede or redirect flood flows.

- d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?**

The project site is not within a mapped 100-year flood hazard area and the project area is not at risk from tsunami or in a seiche zone.

- e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

Please see a.), above.

Cumulative Impacts

There are no adverse cumulative environmental impacts to hydrology/water quality resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to hydrology/water quality have been identified; therefore, no mitigation is required.

XI LAND USE & PLANNING

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project physically divide an established community?	☐	☐	☐	■
b. Would the project 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?	☐	☐	☐	■

Regulatory Overview

Development in the project area is governed by the City of Santa Rosa General Plan³¹ and zoning ordinance. The project area is entirely developed according to those planning documents. The General Plan outlines the purpose of general plans as follows:

State law requires each California city and county to prepare a general plan. A general plan is defined as, “a comprehensive, long-term plan for the physical development of the county or city, and any land outside its boundaries which in the planning agency’s judgment bears relation to its planning.” State requirements call for general plans that, “comprise an integrated, internally consistent and compatible statement of policies for the adopting agency.”

The Santa Rosa General Plan addresses issues related to physical development, growth management, transportation services, public facilities, community design, energy efficiency, greenhouse gas reduction strategies, and conservation of resources in the Planning Area. The General Plan:

- Outlines a vision of long-range physical and economic development that reflects the aspirations of the community, and provides specific implementing policies that will allow this vision to be accomplished;
- Establishes a basis for judging whether specific development proposals and public projects are in harmony with said vision;
- Allows city departments, other public agencies, and private developers to design projects that will enhance the character of the community, preserve and enhance critical environmental resources, and minimize hazards; and
- Provides the basis for establishing and setting priorities for detailed plans and implementing programs such as the Zoning Code, specific and area plans, and the Capital Improvement Program.

Virtually all municipal planning is based on the General Plan and its long-term projections. Demographics, public utility, public services, housing, safety, transportation, open space and recreation needs are forecast

³¹ *Santa Rosa General Plan*. City of Santa Rosa. November 3, 2009.

dependent on the General Plan. Therefore, amending the General Plan is subject to City Council and Planning Commission review and only occurs three times per year.

The City's zoning code is used to implement the goals and policies of the General Plan and specifies zoning designations compatible with the General Plan's land use designations. The zoning code further provides allowable land uses and conditional uses (subject to conditional use permits) and defines development standards. Development standards include minimum lot size, density, setbacks, lot coverage, height limits and other criteria compatible with each zoning designation.

The project area's General Plan designations are shown on Figure XI-1 and zoning designations are shown on Figure XI-2. Because the cannabis microbusiness land use was not included with the current site designations in the City's Cannabis Ordinance, the project applicant is proposing to amend the General Plan and zoning to be consistent with the proposed use. The existing and proposed designations are:

General Plan	Existing: Retail and Business Services (RBS)
Designation:	Proposed: Industry Light (IL)
Zoning:	Existing: General Commercial (GC)
	Proposed: Industry Light (IL)

Analysis

a. Would the project physically divide an established community?

The project would not physically divide an established community. The project site is located in an area designated for commercial and light industrial uses and almost entirely built out. The project would repurpose an existing building and would not have any physical impact to the established community beyond those described in this document.

b. Would the project 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?

The proposed project would repurpose an existing developed site within a commercial and light industrial area to a new cannabis microbusiness. Essentially, this would include changing the use from a furniture retail use to the proposed use. No significant modifications to the existing building's exterior would occur and the developed site would similarly only have minor modifications. The potential physical environmental impacts of this proposed project are relatively few and discussed in this document. From a traffic and GHG emissions perspective, the project would actually have a beneficial impact to the environment by reducing traffic trips and associated GHG emission. No other physical impacts have been identified that could not be reduced to a level of less than significant with the incorporation of mitigation.

The project is not consistent with the existing General Plan and zoning designations, as established by the City's Cannabis Ordinance. The proposed project would include a General Plan amendment and rezoning to bring the proposed use into compliance with the Cannabis Ordinance. The project applicant provided the following information regarding the planning element.

The purpose of the General Plan amendment is to modify the current General Plan designations for two project Assessor's parcels. The General Plan amendment is intended to support the proposed development of the two assessor's parcels... In addition to the General Plan amendment, a rezoning application has been submitted to rezone the two assessor's parcels to conform to the proposed General Plan designations.

The site at 3515 Industrial Drive shares a common 145 ft. with the property located at 3570 Airway Drive, which is zoned IL. The property is otherwise sited with other General Commercial properties [as shown on Figure XI-2].

Due to the rezoning component, City staff raised the issue of spot zoning. Spot Zoning is the application of zoning to a specific parcel or parcels of land within a larger zoned area when the rezoning is at odds with a city's master plan and current zoning restrictions. Typically, it applies only where an isolated parcel has zoning inconsistent with the surrounding zoning or land uses. However, spot zoning of an isolated parcel is permissible "where rational reason in the public benefit exists for such classification." *Avenida San Juan Partnership v. City of San Clemente*, 201 Cal. App. 4th 1256 (2011).

The small size of the parcel is not the sole defining characteristic of a spot zone. Rather, the defining characteristic is the narrowness and unjustified nature of the benefit to the particular property owner, to the detriment of a general land use plan or public goals.

Here, the Applicants seek to rezone a General Commercial property to Light Industry. As is clear from the neighborhood context map, the parcel is not surrounded by CG zoning [see Figure XI-2]. Rather, the property shares 145 feet of property line with a parcel zoned IL, which is itself a gateway parcel to a large swath of the City's industrial properties. Thus, a rezoning to IL designation would be appropriate given the change in nature of the uses of the surrounding properties. Additionally, the property itself is engaged in commercial and industrial activities already, as are many of the surrounding properties, thus providing further evidence that the nature of activities and uses in the area has changed over time. Finally, the City's zoning code, in Section 20-24.020, indicates that the IL designation is appropriate for "light industrial uses, as well as commercial service uses..." which reflects the activities currently underway thus foreclosing the prospect that the rezoning would leave the parcel incompatible with its neighbors in violation of Santa Rosa's general land use plans or public goals.

Based on the project applicant's analysis of the compatibility of the proposed land use and zoning designations with existing surrounding uses, the proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Cumulative Impacts

There are no adverse cumulative environmental impacts to land use and planning resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to land use and planning have been identified; therefore, no mitigation is required.

XII MINERAL RESOURCES

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project 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. Would the project 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 Setting

SANTA ROSA GENERAL PLAN

The project area is almost entirely built out. The City's General Plan does not indicate the presence of mineral resources of value or importance in the project area.

Analysis

a. Would the project 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?

The project site does not include any known mineral resource that would be of value to the region and the residents of the state. The project would not affect the availability of any such resource.

b. Would the project 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?

The project area is not delineated in the City's General Plan or the County's Aggregate Resource Management Plan as a locally important mineral resource recovery site.

Cumulative Impacts

There are no adverse cumulative environmental impacts to mineral resources resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to mineral resources have been identified; therefore, no mitigation is required.

XIII NOISE

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project result in 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. Would the project result in generation of excessive ground borne vibration or ground borne 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?	☐	☐	☐	■

Environmental Setting

Existing ambient sound levels in the project area can be considered typical of a collector roadway adjacent to commercial and light industrial uses. Sources of noise in the area come primarily from traffic along Industrial Drive and light industry. Traffic and land use noise is highest during the daytime hours and subsides during the night. Because the project would repurpose and existing building with a less intensive use, no noise study was conducted.

NOISE-SENSITIVE USES

Noise-sensitive land uses in the project area are nearby single and multi-family residences, approximately one-quarter mile to the north, west and south. Uses in the immediate project area are commercial and light industrial and not considered noise-sensitive uses.

Regulatory Setting

LOCAL REGULATIONS

City of Santa Rosa Noise Exposure Limits

The General Plan and zoning ordinance are the primary ways the City regulates noise levels and compatible uses. The City's ambient noise levels associated with zoning districts is shown below (Santa Rosa City Section Code 17-16.030). Code Section 17-16.120 states: It is unlawful for any person to operate any machinery, equipment, pump, fan, air-conditioning apparatus or similar mechanical device in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient base noise level by more than five decibels. City Code Section 17-16.150 "Motor-driven vehicles-Noise" provides

vehicle noise level limitations as set forth in Section 23130 of California Vehicle Code. This allows for higher noise levels for vehicles.

Zone	Time	Sound Level A (decibels) Community Environment Classification
R1 and R2	10 p.m. to 7 a.m.	45
R1 and R2	7 p.m. to 10 p.m.	50
R1 and R2	7 a.m. to 7 p.m.	55
Multi-family	10 p.m. to 7 a.m.	50
Multi-family	7 a.m. to 10 p.m.	55
Office & Commercial	10 p.m. to 7 a.m.	55
Office & Commercial	7 a.m. to 10 p.m.	60
Intensive Commercial	10 p.m. to 7 a.m.	55
Intensive Commercial	7 a.m. to 10 p.m.	65
Industrial	Anytime	70

Analysis

- a. **Would the project result in 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?**

The project would not result in any long-term increases in noise levels in the project vicinity. The proposed project repurposes an existing developed site currently used as a retail furniture store. Exterior noise making activities of the proposed project would be similar to, but less intensive than, existing operations and are primarily related to loading and unloading delivery trucks. Noise levels associated with odor control would be similar to the existing HVAC equipment. Because the proposed use would be less intensive in terms of trip generation, there would be a decrease in traffic related noise. Interior noise associated with the proposed project would also be similar to existing conditions. The proposed project includes manufacturing (processing of cannabis) but this is not a machinery-intensive process and is mostly done by hand. The project would not result in an increase in long-term ambient noise levels and would be consistent with Santa Rosa City Section Code 17-16.030.

- b. **Would the project result in generation of excessive groundborne vibration or groundborne noise levels?**

Implementation of the project would not result in the exposure of people to or the generation of groundborne vibration or noise levels. None of the proposed activities would utilize equipment that would result in groundborne vibration or 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?**

There are no active public use airports within two miles of the project area. The project would not alter the existing noise environment resulting from air traffic.

Cumulative Impacts

There are no adverse cumulative environmental impacts to noise resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to noise have been identified; therefore, no mitigation is required.

XIV POPULATION & HOUSING

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project 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. Would the project displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

Analysis

- a. **Would the project 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)?**

The project would repurpose an existing building for a cannabis microbusiness and would not induce population growth.

- b. **Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No housing would be displaced by the project. The project repurposes an existing building in an area built out with commercial and light industrial uses.

Cumulative Impacts

There are no adverse cumulative environmental impacts to population and housing resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to population and housing have been identified; therefore, no mitigation is required.

XV PUBLIC SERVICES

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

Environmental Setting

The City generally provides all of the public services in the project area. The project is located entirely within the City's Fire Department service area and police department service area. The project area is served by Santa Rosa City Schools.

Analysis

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

a.i. Fire protection?

The project would not have any negative effect on fire protection services. The project will repurpose an existing building. All interior modifications associated with the project will be subject to City building department approval and fire department review to ensure improvements meet current codes.

a.ii. Police protection?

The project would not impact police protection. The project applicant would comply with the City's Cannabis Ordinance, including provision of required site security measures, on-site security

guard and video surveillance. Regulating cannabis industry under the Cannabis Ordinance ensures police department input into permitting requirements.

a.iii. Schools?

The proposed project would not have an impact to schools. Pursuant to Health and Safety Code Section 11362.768 and the City's Cannabis Ordinance, the site is over 600 feet from any K-12 school.

a.iv. Parks?

The project would not impact any parks.

a.v. Other public facilities?

The project would not impact other public facilities.

Cumulative Impacts

There are no adverse cumulative environmental impacts to public services resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to public services have been identified; therefore, no mitigation is required.

XVI RECREATION

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
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 Setting

The City's Recreation and Parks Department operates parks within the City limits. The nearest formal recreation areas are Coffee Park, approximately one-half mile to the west and the Piner Creek Trail, approximately one-quarter mile to the west.

Analysis

- 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?**

The project would not be growth inducing and would not increase use of existing neighborhood and regional parks or other recreational facilities. The project would not be located near any parks or recreational facilities.

- 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?**

The project would not include any recreational facilities or require construction or expansion of recreational facilities. The project would repurpose an existing building.

Cumulative Impacts

There are no adverse cumulative environmental impacts to recreation resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to recreation has been identified; therefore, no mitigation is required.

XVII TRANSPORTATION

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	■	☐
b. Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☐	■
c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	■	☐	☐
d. Would the project result in inadequate emergency access?	☐	☐	☐	■

Environmental Setting

Industrial Drive is a two lane road running east to west from Cleveland Avenue and looping south to Piner Road. The area is served by Highway 101 via Hopper Avenue. Both sides of Industrial Drive have sidewalks. Santa Rosa CityBus route 10 runs along Hopper Road to the north and Cleveland Avenue to the East and serves the project area. Industrial Drive does not currently have, and is not planned to have, a designated bike lane in the 2018 Bicycle and Pedestrian Master Plan Update³².

Transpedia Consulting Engineers (TCE) prepared a letter report³³ for potential traffic impacts of the proposed project. This section utilizes excerpts of that report.

Analysis

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. TCE utilized the following operations plan for their analysis of trip generation:

³² <https://srcity.org/2711/Bicycle-and-Pedestrian-Master-Plan>

³³ T&L Industrial Cannabis Project Letter Report. Transpedia Consulting Engineers. August 20, 2019.

It is anticipated to have 10 employees to operate the business with a maximum of 5 employees at peak hours. The general manager will be present five days a week. In addition, an outsourced security firm will provide a security guard 24/7.

Business deliveries to and shipments from the facility will occur 1-2 times per week. These deliveries and shipments will be by van-sized vehicles, but occasionally, a freight truck will be necessary. Product testing will be done onsite by an outside laboratory company.

Trip generation is an estimate for the number of vehicles that would likely access the project during a typical weekday. The trip generation of the existing, permitted, rezoned and proposed uses of the development site were partially or fully estimated based on rates provided in *Trip Generation, Institute of Transportation Engineers (ITE)*, 10th Edition, 2017.

TCE reported the following results. Tabulated results are available in their report.

As a worst-case scenario, it is assumed that all morning shift 5 employees would arrive during am peak hour and leave during pm peak hour; all afternoon 5 shift employees would arrive during pm peak hour; the general manager would arrive during am peak hour and leave during pm peak hour; security guards would arrive and leave during am and pm peak hours; an outside testing company employee would arrive and leave during am and pm peak hours; and a business delivery or shipment would arrive and leave during am and pm peak hours.

In comparison to the existing use, the proposed project would generate 80 net daily trips less, 6 net trips more during am peak and pm hours each. However, in comparison to the site permitted use, the proposed project would generate 693 net daily trips less, 7 net trips less during am peak hour, and 58 net trips less during pm peak hour. Moreover, in comparison to the site rezoned use, the proposed project would generate 54 net daily trips less, 3 net trips less during am peak hour, and 4 net trips more during pm peak hour.

In the worst-case scenario, the project would generate 6 additional trips during am or pm peak hours, which is below the 50 peak hour trips threshold when the City would require a full traffic study for a proposed project.

Because the project's worst case traffic impacts are below the City's threshold for requiring a full traffic study, the impact would be less than significant and not conflict with a program, plan, ordinance or policy addressing the circulation system.

Beyond the peak traffic periods, CTE reports that the proposed project would result in decreased trips overall, as shown below. The "permitted use" and "rezoned use" are estimates of maximum trip generation under the existing and proposed zoning designation.

Land Use Scenario	Total Daily Trips	Net Trip Reduction from Land Use Scenario
Existing Use	123	No change
Proposed Use	43	80 trip reduction
Permitted Use—General Commercial	736	693 trip reduction
Rezoned Use—Light Industrial	97	54 trip reduction

The proposed use would result in a net daily trip reduction of 80 trips.

The project will not impact bicycle facilities. There are no formal bicycle routes along Industrial Drive. ETC reports that two bicycle parking spaces would be needed to meet City regulations. The project applicant would install a new bicycle rack for five, exceeding regulations.

ETC reports that the site currently provides 54 vehicle parking spaces, 3 of which are ADA compliant parking spaces. Twenty two vehicle parking spaces would be required by code for the proposed use. The project site's proposed parking supply exceeds the rezoned use parking requirements as well as proposed project's parking requirements

Both sides of Industrial Drive are equipped with sidewalks. The project would not alter that or otherwise impact pedestrian access. ADA improvements would be made to the project site, where required, consistent with City permits.

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

CEQA Guidelines § 15064.3 requires Lead Agencies to adopt thresholds of significance for vehicle miles traveled (defined as “the amount and distance of automobile travel attributable to a project”). State-wide compliance with § 15064.3 begins July 1, 2020. The City has not yet adopted thresholds of significance for vehicle miles traveled and analysis is similarly not required for CEQA documents circulated prior to that date. CEQA Guidelines § 15064.3, subdivision (b) is therefore not applicable to this document. However, a qualitative analysis is provided below.

CEQA Guidelines § 15064.3, subdivision (b) includes criteria for analyzing transportation impacts. For land use projects, it states:

Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

The project would be considered to be less than significant based on the project decreasing existing traffic conditions. The project would not increase vehicle trips to or from the project area. TCE reported that the proposed project would result in a daily decrease of 80 trips from the existing use. While this is not a vehicle miles traveled analysis, § 15064.3 (b) (3) allows for qualitative analysis. In this case, an 80 trip per day decrease would almost certainly reduce overall vehicle miles travelled given the current retail sales and furniture delivery operations currently at the site. Therefore, a vehicle miles traveled analysis would not be required and can be presumed to have a less than significant transportation impact. The project would not conflict with and is not inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

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

The project would not increase design hazards, with incorporation of ETC recommendations included in Mitigation Measure T1. ETC reports that:

Sight distance at project's two driveways onto Industrial Drive was evaluated based on Caltrans sight distance standards (Caltrans Highway Design Manual, July 2, 2018). There is a speed limit signs on Industrial Drive in the project vicinity of 30 miles per hour. The Manual requires a minimum stopping sight distance of 200 feet for a 30-mph design speed.

The sight distance measured from a 3.5-foot height at the location of the driver and 15-feet back from the road edge-line. The sight distance currently provided at the two project driveways is approximately 550-625 feet when looking to the east and west, which exceeds Caltrans minimum sight distance requirements (200 feet).

Project site access and internal circulation would be provided by two two-way driveways onto Industrial Drive. All internal project roadways are adequately wide for moving traffic and parked vehicles. Roadway channelization markings and a stop sign are recommended to be placed at each project driveway. It is also recommended to install a "DO NOT ENTER" sign at the southwestern corner of the building and install pavement markings for traffic circulation path.

Mitigation Measure T1 includes the above recommendations to ensure they are made part of the project's conditions of approval.

d. Would the project result in inadequate emergency access?

The project would not have any impact to emergency access. The project would retain both driveways into the site and full building perimeter access.

Cumulative Impacts

There are no adverse cumulative environmental impacts to transportation resulting from implementation of the proposed project.

Mitigation Measures

T1

To improve driveway safety, the project shall be conditioned to include roadway channelization markings and a stop sign to be placed at each project driveway. A "DO NOT ENTER" sign shall be placed at the southwestern corner of the building and the applicant shall install pavement markings for traffic circulation path.

XVIII TRIBAL CULTURAL RESOURCES

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) 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	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

REGULATORY SETTING

Assembly Bill 52 (AB52), the Native American Historic Resource Protection Act, sets forth a proactive approach intended to reduce the potential for delay and conflicts between Native American and development interests. AB52 established a formal consultation process of California Native American Tribes to be conducted during the CEQA process. All projects that file a Notice of Intent to adopt a Mitigated Negative Declaration after July 1, 2016, are subject to AB52 which added tribal cultural resources (TCR) protection under CEQA. A TCR is defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register, or included in a local register of historical resources. A Native American Tribe or the lead agency, supported by substantial evidence, may choose at its discretion to treat a resource as a TCR. AB52 also mandates lead agencies to consult with tribes, if requested by the tribe, and sets the principles for conducting and concluding consultation.

Senate Bill 18 (SB18) was passed in 2004 and requires agencies to allow the opportunity for Tribal consultation prior to adoption or amendment of General Plans. Because this project would amend the General Plan designation at the project location, SB18 compliance is required.

Analysis

- a. **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- a.i. **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)?**

City data indicates the building was constructed in 2004. There are no buildings or structures within the project site that would be considered to be a historical resource based on the relatively recent construction. Because no ground disturbing construction is anticipated or proposed, there would not be a risk of accidental discovery of historic resources, so no mitigation is required.

- a.ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

The City sent a request to the Native American Heritage Commission (NAHC) for a record search of the Sacred Lands File (SLF). The NAHC responded on January 30, 2020³⁴, indicating that the SLF check was negative for the project's APE. The NAHC also included a Native American Contacts List of known Tribes in the project area. The City sent SB18 letters to the following Tribes on October 18, 2019 and AB52 letters on January 30, 2020.

- Cloverdale Rancheria of Pomo Indians, Patricia Hermosillo, Chairperson
- Dry Creek Rancheria Band of Pomo Indians, Chris Wright, Chairperson
- Federated Indians of Graton Rancheria, Gene Buvelot
- Federated Indians of Graton Rancheria, Greg Sarris, Chairperson
- Guidiville Indian Rancheria, Merlene Sanchez, Chairperson
- Kashia Band of Pomo Indians of the Stewarts Point Rancheria, Dino Franklin Jr., Chairperson
- Lytton Rancheria, Marjorie Mejia, Chairperson
- Middletown Rancheria, Jose Simon III, Chairperson
- Mishewal-Wappo Tribe of Alexander Valley, Scott Gabaldon, Chairperson

No responses were received for the AB52 notification. One response was received related to the SB18 notification from Brenda Tamaras representing the Lytton Rancheria³⁵. Ms. Tamaras indicated Lytton Rancheria would not request further consultation. No Tribes responded requesting consultation or indicating the potential presence of Tribal Cultural Resources. The project will not impact a resource set forth in Public Resources Code Section 5024.1.

³⁴ Letter from the Native American Heritage Commission. Sarah Fonseca. January 30, 2020.

³⁵ Email response from Brenda L. Tamaras to Kristinae Toomians. November 4, 2019.

Cumulative Impacts

There are no adverse cumulative environmental impacts to tribal cultural resources resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to tribal cultural resources have been identified; therefore, no mitigation is required.

XIX UTILITIES & SERVICE SYSTEMS

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	■
b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	■
c. Would the project 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. Would the project 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. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	■

Environmental Setting

The City currently provides water and sewer service to the project site and surrounding project area. Solid waste disposal and recycling is provided by Recology. Electricity and natural gas delivery infrastructure is owned by PG&E and electricity is generally provided by Sonoma Clean Power (some customers may opt-out and be provided by PG&E). Telephone and internet service are provided by AT&T and Comcast or Sonic, respectively.

Analysis

- a. **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities. The project includes repurposing an existing building and developed site from a retail furniture store to

a cannabis microbusiness. All utilities currently exist to service the site. The project is not growth inducing and would not increase demand for utilities in the service area.

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

No new water entitlements would be required. While cannabis cultivation can be water intensive depending on the methodology used to cultivate it, the project is limited in scale (9,927 square feet of cultivation) and would comply with the City's Cannabis Ordinance. While not anticipated, as a municipal water service provider, the City has the ability to adjust water rates to address conservation in the event of multiple dry years.

c. Would the project 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?

Similar to water usage, the proposed use would comply with the City's Cannabis Ordinance. Wastewater service is currently provided to the site and would continue to be provided. The proposed use is not characteristic of a use that would impact the City's wastewater system operational capacity or require pretreatment.

d. Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No increase in solid waste generation would occur as the project would not increase solid waste demands in any significant way above existing uses of the site. Security and disposal of cannabis waste product would occur consistent with the City's Cannabis Ordinance.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The project would comply with all federal, state, and local statutes and regulations related to solid waste.

Cumulative Impacts

There are no adverse cumulative environmental impacts to utilities and service systems resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to utilities and service systems have been identified; therefore, no mitigation is required.

XX WILDFIRE

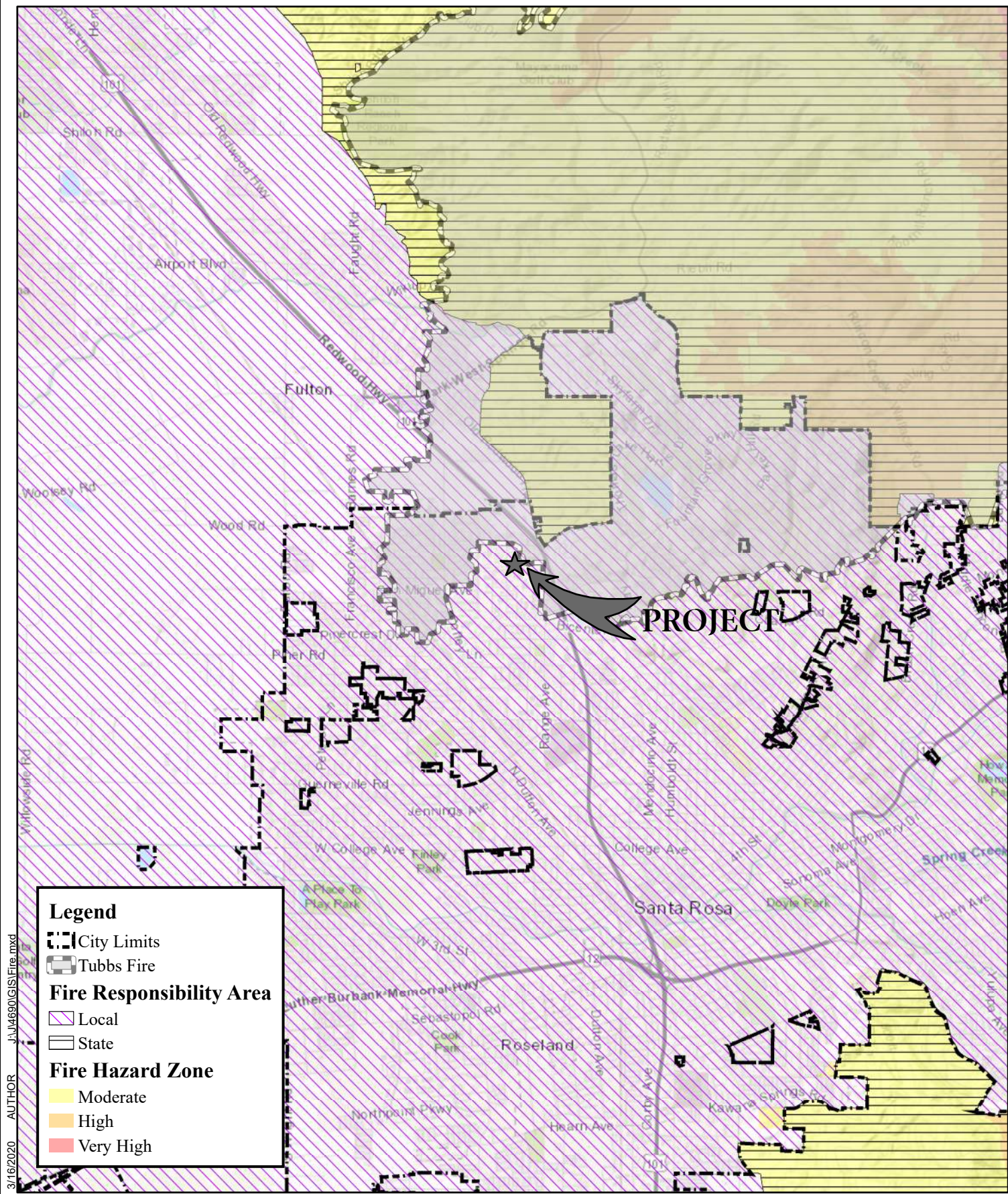
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Substantially impair an adopted emergency 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 Setting

The City prepared its Local Hazard Mitigation Plan (LHMP) in 2016 that assessed potential risks to the City. The LHMP identifies the City as being at high risk to seismic events, flood, drought and wildfire. The Santa Rosa Fire Department and the Santa Rosa Police Department coordinate emergency response and evacuations based on the LHMP, nature of the emergency and coordination with the County of Sonoma, as required.

Since the LHMP was adopted, the City has experienced two catastrophic wildfire events, the October 2017 Tubbs fire and the 2019 Kincadee fire. Evacuations were required during both fires and the Tubbs fire burned portions of the project area to the north, west and east. The westerly perimeter of the Tubbs Fire is shown on Figure XX-1. The project site itself was not damaged.

The project area is served by the City's Fire Department and is not located within a state responsibility area, as shown on Figure XX-1. The project area is not classified as a High Fire Severity Zone.



3/16/2020 AUTHOR J:\4690\GIS\Fire.mxd

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
 Projection: Lambert Conformal Conic
 Datum: North American 1983
 Units: Foot US

Data Source Information:
 CalFire (2019)

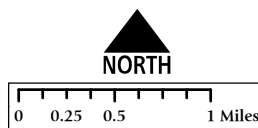


FIGURE XX-1
FIRE RESPONSIBILITY AREA

Analysis

- a. **Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**

The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The project would not have any long-term impact to emergency access since it would repurpose an existing developed site. Existing driveway access and building perimeter access would be retained.

- b. **Would the project 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?**

The project would not exacerbate wildfire risks. Repurposing an existing building will have no impact to existing known wildfire risks.

- c. **Would the project 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?**

The project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk. The project site is already served by City infrastructure.

- d. **Would the project 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?**

The project would not alter existing risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The project simply repurposes an existing developed building.

Cumulative Impacts

There are no adverse cumulative environmental impacts from wildfire resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to or from wildfires have been identified; therefore, no mitigation is required.

XXI 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?**

The project would not have a significant adverse impact on the habitat of any plant or animal species or historic or prehistoric resource. Furthermore, the project would not substantially degrade the environment or reduce the level of an endangered or otherwise important plant or animal population below self-sustaining levels. The project repurposes an existing developed site and no such resources are present.

- 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)?**

The project repurposes an existing building within an existing built out area of the City. Potential impacts are generally very limited and are in no way cumulatively considerable. The project would operate under local and state permitting and would be consistent with surrounding uses. No significant utility demands are associated with the project.

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

The project would not cause substantial effects on human beings either directly or indirectly. Cannabis has been recognized by the state as a legal medical treatment. The proposed project meets state and local regulations with regard to siting considerations related to effects on human beings such as distances from schools, generation of odors and security.

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 measures 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.

Kristinae L. Toomians

Signature

Kristinae L. Toomians

Printed Name

06/23/2020

Date

For:

City of Santa Rosa

DOCUMENT PREPARATION AND SOURCES

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<https://srcity.org/2711/Bicycle-and-Pedestrian-Master-Plan>

Prepared by:

Justin Witt—Environmental Planner

APPENDIX A: MITIGATION MONITORING AND REPORTING PLAN

T&L Commercial Microbusiness Facility, PRJ19-039

June 19, 2020

Pursuant to Section 21081.6 of the State CEQA Guidelines¹, the mitigation measures listed in this Mitigation Monitoring and Reporting Plan (MMRP) are to be implemented as part of the proposed project. The MMRP identifies the time at which each mitigation measure is to be implemented and the person or entity responsible for implementation. The initials of the designated responsible person will indicate completion of their portion of the mitigation measure. The City of Santa Rosa's (City) project planner's signature on the Certification of Compliance will indicate complete implementation of the MMRP.

The mitigation measures included in the MMRP are considered conditions of approval of the proposed project. The Project Applicant agrees to implement the mitigation measures proposed in the MMRP. Implementation of the mitigation measures included in the MMRP is expected to avoid, minimize, rectify, reduce, or compensate potentially significant impacts to a less than significant level.

TIME OF IMPLEMENTATION

Project Design: The mitigation measure will be incorporated into the project conditions of approval prior to approving the project.

Construction: The mitigation measure will be implemented during construction.

RESPONSIBLE PERSONS AND DEPARTMENTS

The City as Lead Agency will be responsible for ensuring overall implementation of the MMRP through oversight of the Project Applicant's compliance with the MMRP. The City's project planner will sign off on the mitigation measures included in the MMRP. Periodically, other City staff, consultants or regulatory agencies will be involved in the implementation of specific mitigation measures. In these instances, the staff, department, or agency will be identified in the MMRP.

CERTIFICATION OF COMPLIANCE

The City will be responsible for providing signatures on the Certification of Compliance. The Certification of Compliance is a double-check to ensure that the MMRP was fully implemented.

RECORD KEEPING

The City's project planner will maintain the records of the MMRP. When the MMRP is fully implemented, the original signed copy will be maintained by the City.

¹ California Code of Regulations Title 14.

CERTIFICATION OF COMPLIANCE

Complete the Certification of Compliance after mitigation measures have all been initialed. Use this Certification of Compliance to ensure the full implementation of each mitigation measure.

Project Design

The City's project planner has reviewed the project design, the plans, and the contract special provisions to verify that designated mitigation measures have been incorporated.

Signature & title

Date

Construction

The City's project planner has verified that designated mitigation measures were implemented during construction.

Signature & title

Date

AIR QUALITY

AQ1 The City shall ensure that all measures contained in the August 2019 Odor Control Study prepared by Burke Mechanical Engineering (Odor Control Study, 3515 Industrial Drive. Burke Mechanical Engineering. August 2019.) are incorporated into the project conditions of approval.

Implementation & Monitoring

Project Design: The City's project planner will verify that the mitigation measure is incorporated into the project Conditions of Approval prior to issuing final project approvals.

Initials

Date

Construction: The City's project planner or Building Division shall ensure that Mitigation Measure AQ1 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials

Date

GREENHOUSE GASES

GHG1 To comply with the City's CAP Checklist for New Development, the project shall install real-time energy monitors to track energy use (Checklist Item 1.3.1) and use water meters which track real-time water use (Checklist Item 7.1.3).

Implementation & Monitoring

Project Design: The City's project planner will verify that the mitigation measure is incorporated into the project Conditions of Approval prior to issuing final project approvals.

Initials

Date

Construction: The City's project planner or Building Division shall ensure that Mitigation Measure GHG1 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials

Date

TRANSPORTATION

- T1** To improve driveway safety, the project shall be conditioned to include roadway channelization markings and a stop sign to be placed at each project driveway. A “DO NOT ENTER” sign shall be placed at the southwestern corner of the building and the applicant shall install pavement markings for traffic circulation path.

Implementation & Monitoring

Project Design: The City’s project planner will verify that the mitigation measure is incorporated into the project Conditions of Approval prior to issuing final project approvals.

Initials

Date

Construction: The City’s project planner or Building Division shall ensure that Mitigation Measure AQ1 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials

Date