SANDELL DISTRIBUTION WAREHOUSE

ZONING CODE TEXT AMENDMENT TO ALLOW "STORAGE-WAREHOUSE, INDOOR STORAGE" FACILITIES WITHIN THE CI – COMMERCIAL/INDUSTRIAL ZONING DISTRICT AND USE PERMIT AND DESIGN REVIEW TO CONSTRUCT A NEW 50,064 SQUARE FOOT COMMERCIAL/INDUSTRIAL BUILDING LOCATED AT 597 HELMAN LANE (WEST END OF BLODGETT STREET) TO BE USED AS MOVING AND STORAGE FACILITY WITH OUTSIDE STORAGE OF CONATINERS AND A PARKING REDUCTION. THE PROJECT INCLUDES TEMINATING BLODGETT STREET WITH A NEW CUL-DE-SAC ON THE PROJECT SITE.

ENVIRONMENTAL CHECKLIST AND INITIAL STUDY
DRAFT MITIGATED NEGATIVE DECLARATION

AUGUST 2021

ZONING AMENDMENT AND COMMERCIAL/INDUSTRIAL BUILDING
CEQA ENVIRONMENTAL CHECKLIST AND INITIAL STUDY

Project Title:	Zoning Code Text Amendment and Sandell Distribution Warehouse
Lead agency name and address:	City of Cotati Community Development Department 201 West Sierra Avenue Cotati, CA 94931
Contact person and email:	Joel Galbraith, Senior Planner planner@cotaticity.org
Zoning Amendment to allow Storage-Warehouse, indoor storage within CI Zoning District	
Project Location:	Parcels zoned as CI Commercial/Industrial District city-wide
Description of project:	The proposed project includes a text amendment to Section 17.22.020 (Allowable Land Uses and Planning Permit Requirements) of the Cotati Municipal Code to allow Storage-Warehouse, Indoor Storage within the CI Zoning District, with approval of a Use Permit.
Sandell Distribution Warehouse Facility	
Project Location:	597 Helman Lane at the west end of Blodgettt Street (APN 046-073-006), City of Cotati, Sonoma County, CA
File Number:	PA#21/03 and PA#21/07
Project sponsor's name and address and Property Owners:	Albert Sandell 3348 Paradise Drive Tiburon, CA 94920
General Plan Designation:	Commercial Industrial
Zoning:	Commercial/Industrial District (CI)
Description of project:	The proposed project includes the construction of a 50,064-square-foot warehouse building to operate as a moving and storage company. The project includes loading areas, outdoor storage, paved parking areas, sidewalks, and landscaping, and the construction of a cul-de-sac to terminate the west end of Blodgett Street.
Surrounding land uses and setting; briefly describe the project's surroundings:	The project site is surrounded by land designated as Commercial Industrial to the north, east, and south, and Rural Residential is located west of the project site, across Washoe Creek. Laguna de Santa Rosa abuts the site to the north.
Other public agencies whose approval is required (e.g. permits, financial approval, or participation agreements):	U.S. Fish and Wildlife Service, California Department of Fish and Wildlife.
Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?	The Federated Indians of Graton Rancheria (FIGR) was notified on March 1, 2021. The City has not received a request from FIGR for formal consultation.

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TABLE OF CONTENTS **PAGE #**

1. INTRODUCTION 6
1.1. Executive Summary 6
1.2. Initial Study/Mitigated Negative Declaration 6
1.3. City of Cotati General Plan and EIR (Tierinig) 6
2. PROJECT DESCRIPTION 7
2.1. Zoning Amendment to allow Storage-warehouse within CI Zoning District 7
2.2. Warehouse Building and Facilities 7
3. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED 14
4. DETERMINATION 15
5. EVALUATION OF ENVIRONMENTAL IMPACTS 16
5.1. Aesthetics 16
5.2. Agricultural and Forestry Resources 18
5.3. Air Quality 20
5.4. Biological Resources 35
5.5. Cultural Resources 46
5.6. Energy 50
5.7. Geology and Soils 55
5.8. Greenhouse Gas Emissions 59
5.9. Hazards/Hazardous Materials 61
5.10. Hydrology and Water Quality 65
5.11. Land Use and Planning 73
5.12. Mineral Resources 75
5.13. Noise 76
5.14. Population and Housing 81
5.15. Public Services 82
5.16. Recreation 84
5.17. Transportation 85
5.18. Tribal Cultural Resources 88
5.19. Utilities and Service Systems 90
5.20. Wildfire 95
5.21. Mandatory Findings of Significance Cal. Pub. Res. Code §15065) 97
6. REFERENCE DOCUMENTS 100
6.1. Technical Appendices 100
6.2. Other Documents Referenced 100
7. MITIGATION MONITORING AND REPORTING PROGRAM 102

ACRONMYMS AND ABBREVIATIONS

AFY	acre feet a year
Air Basin	San Francisco Bay Area Air Basin
APN	Assessor Parcel Numbers
AQP	Air Quality Plan
APN	Assessor Parcel Number
ARB	California Air Resources
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CIP	Capital Improvement Program
CI	Commercial/Industrial (Cotati Zoning District)
CORP	Army Corps of Engineers
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CRHR	California Register of Historical Resources
CRPUSD	Cotati-Rohnert Park Unified School District
CTS	California Tiger Salamander
dBA	A-weighted decibel
DEIR	Draft Environmental Impact Report
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substance Control
EIR	Environmental Impact Report
FEIR	Final Environmental Impact Report
GHG	greenhouse gas
gpd	gallons per day per acre
HI	hazard index
HRA	Health Risk Assessment
HMBP	Hazardous Material Business Plan
IRWP	Incremental Recycled Water Program
IS/MND	Initial Study/Mitigated Negative Declaration
ITP	Incidental Take Permit

LID	Low Impact Development
LWWTP	Laguna Wastewater Treatment Plant
mgd	million gallons per day
MBTA	Migratory Bird Treaty Act
MEI	Maximum Exposed Individual
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OEHHA	California Office of Environmental Health Hazards Assessment
PPV	peak particle velocity
PRC	Public Resources Code
RAFD	Rancho Adobe Fire Protection District
RCPA	Regional Climate Protection Agency
ROG	Reactive Organic Gas
RWQCB	Regional Water Quality Control Board
SCH	State Clearinghouse
SCTA	Sonoma County Transportation Authority
SCWA	Sonoma County Water Agency
SR	State Route
SRPCS	Santa Rosa Plain Conservation Strategy
SW	Storage-Warehouse
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
µg/m3	micrograms per cubic meter

1. INTRODUCTION

1.1. EXECUTIVE SUMMARY

The proposed project includes a text amendment to Section 17.22.020 of the Cotati Municipal Code to allow "Storage-Warehouse, indoor storage" (SW) within the Commercial/Industrial (CI) Zoning District, the Storage-Warehouse use would be allowed subject to the approval of a Use Permit. The proposed project includes the construction of a 50,064 square-foot building with outdoor storage and a parking reduction on an 8.47-acre site at the west terminus of Blodgett Street. The project also includes the construction of a City standard cul-de-sac on the project site to provide a formal end to Blodgett Street.

The City of Cotati prepared an Initial Study/Mitigated Negative Declaration (IS/MND) that tiers from the 2013 Cotati General Plan Update EIR. The Draft IS/MND was released for a 30-day public review period between July 2, 2021 and August 2, 2021. The Notice of Availability and Intent to Adopt a Mitigated Negative Declaration was filed with the Sonoma County Clerk on Jun29, 2019. The Notice of Completion was filed with the State Clearinghouse and circulated to State Agencies for review and comment.

1.2. INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

This IS/MND was prepared by the City of Cotati, as the lead agency, pursuant to the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code Sections 21000 et. Seq.), the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3), and the Cotati Municipal Code.

This IS/MND describes the proposed project and its environmental setting, including the project site's existing conditions and applicable regulatory requirements. The IS/MND provides an assessment of the potential impacts to environmental resources that would result from implementation of the proposed project and includes mitigation measures to ensure that there would be no significant adverse impacts on the environment.

1.3. CITY OF COTATI GENERAL PLAN AND EIR (TIERINIG)

This IS/MND tiers from the 2013 Cotati General Plan Update EIR (SCH No. 2013082037), which was certified in March 2015, to examine site-specific impacts of the proposed project. All General Plan policies adopted as mitigation apply to the project analyzed herein. The General Plan EIR reviewed potentially significant environmental effects resulting from plan implementation and developed measures and policies to mitigate impacts. Nonetheless, significant and unavoidable impacts were determined to occur under the General Plan. Therefore, the City adopted a statement of overriding considerations, which balance the merits of approving the plan despite the significant environmental effects. The effects identified as significant and unavoidable in the General Plan EIR are:

Aesthetics

- Impact 3.1-1: Substantial Adverse Effects on Visual Character, including Scenic Vistas or Scenic Resources.
- Impact 4.1: Cumulative Degradation of the Existing Visual Character of the Region

Noise

- Impact 3.10-1: Traffic Noise Sources.
- Impact 3.10-7: Cumulative Noise Impacts
- Impact 4.11: Cumulative Exposure of Noise-Sensitive Land Uses to Noise in Excess of Normally Acceptable Noise Levels or to Substantial Increases in Noise.

Traffic

- Impact 3.12-1: Acceptable traffic operation at the study intersections and roadway segments controlled by the City of Cotati, though the ability to fully fund all identified improvements is uncertain.
- Impact 3.12-2: Acceptable traffic operation on Gravenstein Highway, though the funding and timing of improvements needed to accommodate regional and local growth on the highway is uncertain.
- Impact 3.12-3: Unacceptable operation on US 101 freeway facilities.

- Impact 4.13: Cumulative Impact on the Transportation Network.

Utilities

- Impact 3.13-3: Potential to exceed wastewater treatment capacity or the requirements of the RWQCB.
- Impact 4.14: Cumulative Impact on Utilities.

Other

- Impact 4.15: Irreversible Effects (Consumption of Nonrenewable Resources, Irretrievable Commitments, Irreversible Physical Changes).

A copy of the City of Cotati's General Plan and EIR are available at the Community Development Department, 201 West Sierra Avenue, Cotati, California 94931, during normal business hours and online at http://cotati.generalplan.org/.

2. PROJECT DESCRIPTION

2.1. ZONING AMENDMENT TO ALLOW SW (STORAGE-WAREHOUSE) WITHIN CI (COMMERCIAL INDUSTRIAL) ZONING DISTRICT

Moving and storage warehouse facilities are currently not allowed within the Commercial/Industrial (CI), Zoning District, per the Cotati Municipal Code. The proposed project includes an amendment to Section 17.22.020 (Allowable Land Uses and Planning Permit Requirements) of the Cotati Municipal Code to allow Storage-Warehouse, indoor storage (SW) within the CI Zoning District; the use would be allowed subject to the approval of a Use Permit. Table 2-3: Allowed Land Uses and Permit Requirements for Mixed Use Corridors and Districts in Section 17.22.020 would be amended to add "Use Permit" to allow the SW land use within the CI District. **Figure 1: CI Zoning Districts**, shows all the parcels, city-wide, that are zoned as CI and subject to the proposed zoning text amendment. The proposal also includes adding "warehousing" to Section 17.20.030 Purposes of the zoning districts (C)(1) to include "warehousing" as an appropriate use within the CI District. "Warehousing" is currently included as an appropriate use with the IG District.

All future development projects that seek to construct a SW within the CI Zoning District will be subject to a Use Permit and Design Review (Section 17.62.040), which are discretionary actions that trigger review in accordance with the California Environmental Quality Act (CEQA).

The subject zoning amendment is limited to an update to the Cotati Municipal Code to allow SW within the CI Zoning Districts. As an update to the City's Municipal Code, the proposed project does not grant any right that allows physical development. Rather, it establishes that a Use Permit shall be required to consider storage-warehouse uses within the CI Zoning Districts. In accordance with Section 17.62.050, development application subject to a Use Permit are considered by the Planning Commission.

2.2. WAREHOUSE BUILDING AND FACILITIES

Project Location

The proposed project is located at the west end of Blodgett Street within the City of Cotati, Sonoma County, California (**Figure 2: Regional Location**). The 8.47-acre project site consists of one parcel, APN 046-073-006 which also includes a small remnant parcel (**Figure 3: Project Vicinity**).

General Plan and Zoning

The City of Cotati General Plan identifies the City's vision for the future and provides a framework that will guide decisions on growth, development, and conservation of open space and resources in a manner consistent with the quality of life desired by the City's residents and businesses. To ensure that this desired vision is realized, the General Plan has been designed to be internally consistent and cross-referenced with other documents, including the City's Zoning Ordinance. The project site exhibits a General Plan land use designation of CI-Commercial Industrial (**Figure 4: General Plan Land Use**).

The City of Cotati Zoning Ordinance implements the General Plan. Several different districts are identified in the Zoning Ordinance that are intended to, among other things, provide for a wide range of uses and implement the City's vision to conserve open space and resources. The project site is zoned CI Commercial/Industrial District (**Figure 5: Zoning**). The current zoning designation allows industrial uses, but the CI does not allow storage-warehouse uses. With the proposed zoning text amendment included as part of this proposed project, storage-warehousing will be allowed within the CI District, with a Use Permit.

Existing Conditions

Blodgett Street which terminates as a "stub" at the subject property, is a fully improved two-lane collector street connecting to Helman Lane serving a developed industrial area that is maintained by the City of Cotati. Blodgett Street is a fully improved public street with curbs parking, planter strips and sidewalks.

The project site is completely vacant and contains no existing structures or other improvements. Additionally, there are no trees on the project site.

The project site is regularly disked and therefore, the grassland community has developed following repeated disturbance. The grassland community consists primarily of non-native (invasive) annual grasses and non-native forbs. Non-native annual grass species observed includes oats (*Avena* sp.), rye grass (*Festuca* perennis), and soft chess (*Bromus hordeaceus)*. Non-native forb species observed within the grassland include bristly ox-tongue (*helminthotheca* echioides), carrot (*Daucus* carota), and radish (*Raphanus* sativus).

Approximately 0.88 acres of seasonal wetlands were delineated on the project site in 2008 as verified by the Army Corps of Engineers on June 3, 2010 (File No. SPN-2001-25967-N). The seasonal wetlands were dominated by hydrophytic vegetation including buttercup (*Ranunculus muricatus*), rye grass, semaphore grass (*Pleuropogon californicus*), and soft chess. Hydric soils with the eeasonal wetlands displayed a depleted matrix (10YR 3/2 or 3/1) with heavy mottling and/or oxidized rhizospheres in the top 10 inches. The presence of a biotic crust (algal matting) was the primary indicator of hydrology within the wetlands (Macmillan 2008). No special status plants have been observed on the project site.

The project site has the potential to support three special status wildlife species consisting of the white-tailed kite (WTK), burrowing owl (BW) and the California tiger salamander (CTS). Land within the project vicinity is known to have supported California tiger salamander (CTS) (*Ambystoma californiense*) in the past and the project site is located within the established Critical Habitat for the California tiger salamander.

Land uses surrounding the subject property include the channelized Laguna De Santa Rosa and a developed industrial park to the north, channelized Washoe creek and grassland to the west, Marin/Sonoma Mosquito and Vector Control District facility, and grassland to the south, and a developed industrial/business park to the east.

Project Description

The proposed project includes the construction of an approximately 50,064 square-foot, warehouse building to be used by a moving and storage company. The project also includes an outdoor storage area for containers, loading areas, paved parking areas, sidewalks, and landscaping. Development is proposed on the eastern portion of the site. Access to the project will be from a new cul-de-sac constructed on the project site to provide a terminus to Blodgett Street that complies with City of Cotati standards. No development is currently proposed on the western portion of the site.

New Structures

The proposed project site plan, architecture, preliminary improvement plans, and landscaping plans are provided in the Sandell Distribution Warehouse Re-submittal dated May 24, 2021 (**Appendix A**) and include the following:

Warehouse Building

The 50,064-square-foot warehouse building would be located in the eastern portion of the site back approximately 160 feet from the existing property line. The building would be approximately 40 feet in height not including mechanical screening 3 feet in height. The warehouse building will be used by a moving and storage company that utilizes portable on-demand storage containers.

Architecture

The architectural design for the warehouse building incorporates glass entrances and upper story windows on the east, west, and south sides. The exterior wall material is metal siding. The building incorporates metal awnings, metal roll-up doors, and a flat metal roof which is not visible. Paint finishes consist of generally earth-tone colors of grey, green and red.

Outdoor Storage

A significant component of the project is the outdoor storage of the portable containers on the west side of the building. Each container is 8-feet in height and will be stacked 3 containers high for a total of 24 feet. The containers will not be visible from the street. The projects includes 8-foot tall chain link fencing with slats and landscaping to help screen the containers from adjacent properties.

Frontage Improvements

Proposed frontage improvements include the following:

- Construction of a public 48-foot radius cul-de-sac with curbs, a 5-foot planter strip and a 5-foot concrete sidewalk.
- Access to the project from Blodgett Street includes two driveways and a sidewalk.

Landscaping

The Landscape Site Plan includes a mix of trees, shrubs, and groundcover. Trees and other landscaping are proposed along the perimeter of the project site, throughout the parking lot. Tree Planting Plan and Sheet L1.1: Layout Plan). Landscaping will feature drought tolerant plants and a high efficiency irrigation system. Landscape areas will establish buffers, provide shading, and will serve as stormwater detention facilities.

Water Supply

Potable water would be accommodated via the extension of an existing water lateral that would connect the new building to the existing 10-inch water line within Blodgett Street.

Wastewater

Wastewater would be accommodated via the installation of new sanitary sewer laterals that would connect to the existing 8-inch sanitary sewer main within Blodgett Street. The new sanitary sewer lines would collect wastewater generated onsite and conveys flows through the existing sanitary sewer system to the wastewater processing plant for treatment.

Solid Waste

One covered solid waste containment area is proposed located at the northeast corner of the site. The solid waste containment area would include two dumpsters, one for trash/landfill materials and one for recyclable materials, and would be enclosed by 6-foot-high concrete masonry unit walls with metal gates.

Storm Drainage Infrastructure

Storm drains would be utilized throughout the project site to direct stormwater from impervious areas to the vegetated bio-retention features consistent with the requirements of Low Impact Development (LID). Stormwater runoff would r discharge to the to the existing storm drain network along Blodgett Street. The project includes subsurface retention chambers underneath the parking lot to accommodate all the runoff that is conveyed from the flow-through planters for both the 10-year design storm and 100-year check storm.

Site Preparation and Construction

For the purpose of this analysis, it is assumed that site preparation and construction would occur within an approximately 12-month period.

The project would achieve a near balance of cut and fill with the possibility of the need to import approximately 1,000 cubic yards of fill. Following completion of grading activities, infrastructure improvements and building foundations would be constructed. Utilities, storm drains and catch basins would be installed and buildings erected. New driveways, sidewalks, curbs and gutters, striping, landscaping, and signage would be installed.

Construction equipment expected to be utilized during site preparation and grading includes tractors, backhoes, haul trucks, graders, pavers and water trucks. All material and equipment would be staged on-site.

Construction of the proposed project will result in no filling of the existing 0.88 acres of jurisdictional seasonal wetland regarded as waters of the U.S. and State subject to regulation by the U.S. Army Corps of Engineers and the Regional Water Quality Control Board (RWQCB).

Operation

The applicant is in negotiations with PODS Enterprises, LLC to lease the building upon completion. PODS is a moving and storage company which utilized portable on-demand containers. Approximately 85% of the PODS business in Sonoma County is from customers moving between houses locally or out-of-state. The proposed warehouse would be used to store customer household goods in containers. Additionally, empty containers ready for delivery to customers are stored/staged outside in a secure yard. When a customer orders a container for storage, PODS delivers it to the customer's home. When the container is filled, PODS picks it up and stores it in its warehouse. If a customer later requires access to his/her container, they make an appointment with 72 hours' notice and PODS brings the container outside from the warehouse at the appointed time, and then returns it to storage when the customer leaves. This happens 4 to 5 times a day. No customers are ever allowed into the warehouse. When a customer no longer requires storage, PODS delivers the container for unpacking to the customer's home, whether that is at the original location, across town or across the country.

The facility will have approximately 10 employees during normal business hours Monday through Saturday. They will use 4 local delivery trucks to deliver and retrieve the containers to local residents and business (approximately 32' long each) making between 10 to 14 trips each day. In addition there will be deliveries and/or pick-ups by 2 to 3 OTR (tractor/trailer rigs) per day to move the containers between PODS' warehouses, both within California and to other states.

Required Discretionary Actions

The project requires the following discretionary entitlements from the City of Cotati:

- Zoning text amendment to allow Storage-warehouse, indoor storage within the Commercial/Industrial Zoning Designation, with a Use Permit.
- Use Permit for the proposed warehouse to be used by a moving and storage company with a parking reduction.
- Design Review for the buildings and landscaping of the site.

Other Public Agency Review

The project requires approval from the following public agencies:

- U.S. Fish and Wildlife Service (Endangered Species Act permit)
- California Department of Fish and Wildlife Service (California Endangered Species Act permit)

California Native American Tribal Consultation

In accordance with Public Resources Code (PRC) Section 21084.2, lead agencies are required to consider Tribal Cultural Resources (TCR) including a site feature, place, cultural landscape, sacred place or object, of cultural value to the tribe and is listed on the California Register of Historic Resources (CRHR) or a local register, or the Lead agency, at its discretion, chooses to treat resources as such.

In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the Federated Indians of Graton Rancheria on March 1, 2021 which included a brief description of the proposed project and its location, the City of Cotati's contact information, and a notification that the Federated Indians of

Graton Rancheria has 30 days to request consultation pursuant to this section. Notices were also sent on June 18, 2021, to groups and individuals recommended by the NAHC.

As of August 2, 2021, the City of Cotati has not received a response requesting consultation under PRC Section 21080.3.1(b)(2) from the Federated Indians of Graton Rancheria or from the list of groups and individuals provided by the NAHC.

Figure 1: CG Zoning District

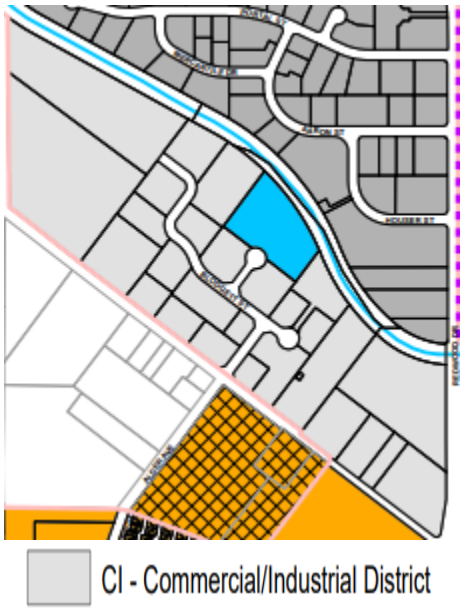
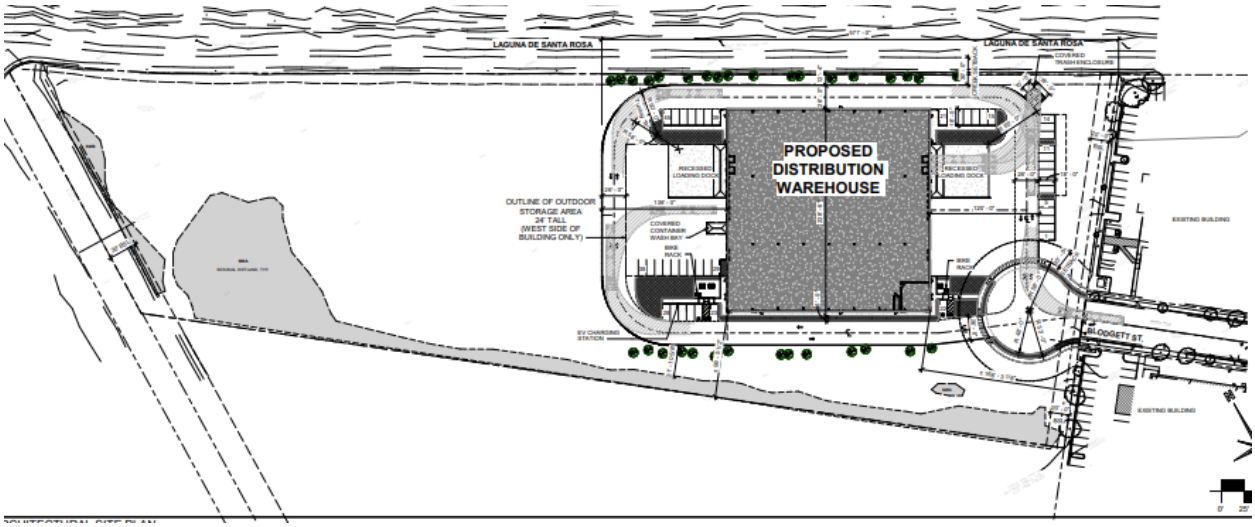


Figure 2: Regional Location

Figure 3: Project Vicinity

Figure 4: General Plan Land Use

Figure 5: Site Plan



3. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact Unless Mitigation is Incorporated" as indicated by the checklist on the following pages.

Aesthetics		Greenhouse Gas Emissions		Public Services	
Agricultural & Forestry Resources		Hazards & Hazardous Materials	X	Recreation	
Air Quality	X	Hydrology / Water Quality	X	Transportation	
Biological Resources	X	Land Use / Planning		Tribal Cultural Resources	X
Cultural Resources	X	Mineral Resources		Utilities / Service Systems	
Energy		Noise	X	Wildfire	
Geology / Soils	X	Population / Housing		Mandatory Findings of Significance	

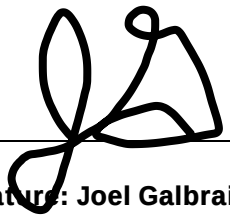
The CEQA Initial Study (IS) Checklist and written explanations are provided in Section 4 below. The IS Checklist and narrative indicate the level of significance of the potential environmental effects of the proposed project upon each of the noted environmental resources.

4. DETERMINATION

(TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

I find that the proposed project **COULD NOT** have a significant effect on the environment. 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.	**X**
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.	



August 2, 2021

Signature: Joel Galbraith, Senior Planner, City of Cotati **Date**

5. EVALUATION OF ENVIRONMENTAL IMPACTS

The following discussion addresses the potential level of impact relating to each aspect of the environment.

5.1. AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	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) 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 points.) 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?	☐	☐	☒	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; Biological Resource Analysis, prepared by Sol Ecology, February 16, 2021; Project Plans dated May 24, 2021; and California Scenic Highway Mapping System, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, Accessed October 11, 2018.

Existing Aesthetics Setting:

The City of Cotati is located in the southern portion of Sonoma County where it is surrounded by the Sonoma Mountains, old growth oaks and vineyards. Cotati is bisected by Highway 101, north of Petaluma and south of Rohnert Park. The City of Cotati exhibits a historic city core with traditional urban forms featuring minimal setbacks and large sidewalks. The remainder of the City, near the periphery, most closely resembles modern suburban patterns of development comprised primarily of detached houses with a limited number of townhomes, apartments and some retail/commercial uses. The more suburban areas of the City exhibit a uniformity that is generally absent from the downtown core.

The project site where Sandell Distribution Warehouse is proposed exhibits flat topography is undeveloped with no structures or trees. Site features include ruderal vegetation and a seasonal wetland.

The site is located at the western edge of urbanized Cotati and is bordered by existing industrial/business parks to the east and north, mosquito and vector control facilities and grassland to the south, and channelized creeks to the west and north.

Aesthetics Impact Discussion:

Zoning Text Amendment to Allow SW within CI Zoning District

5.1(a-d) (Scenic Vista, Scenic Resources, Degrade Visual Character, Conflict with Regulations Governing Scenic Quality, Light and Glare) No Impact: As shown in Figure 1, the parcels that are zoned as CI are located along the north side of Helman Lane and within the City limits. The CI District currently allows relatively large industrial buildings similar to those existing directly to the east of the subject property and located within the CI District. The proposed zoning text amendment would allow for future development applications to be received for storage and warehouse uses within the CI Zoning District. Future SW development within the CI district would introduce new buildings that are expected to be similar in size and character to those that are currently allowed in the District (e.g.,light industrial). Further, any future SW applications within the CI Zoning District would be subject to a Use Permit that would consider compatibility with surrounding uses and Design Review that would consider that the architectural style, massing, color and materials, and outdoor lighting. The proposed zoning text amendment is consistent with the General Plan and would allow SW in the CI Zoning District where similar types of uses are already allowed. Therefore, there would be no aesthetic impacts from the proposed zoning text amendment.

Storage warehouse facility

5.1(a) (Effect a Scenic Vista) Less Than Significant Impact: Scenic vistas viewed from the project site are largely confined to views of the rural Sonoma County pastureland and hills west of Cotati. The project site is not located on a designated scenic corridor, or within or adjacent to a Sonoma County designated scenic landscape. The project proposes the development of a large warehouse building 40 feet in in height, and associated site improvements. The project site is currently undeveloped and surrounded by mostly light industrial development. Development of the proposed project site will extend the existing urban landscape observed in the project vicinity. Views of the Laguna de Santa Rosa watershed, Sonoma Mountains, local hillsides, natural resources, open space and agricultural lands will not be substantially impacted by the proposed development project. Therefore, impacts associated with scenic vistas will remain below significant levels.

5.1(b) (Scenic Resources from Designated Scenic Highway) No Impact: Natural scenic resources in and around Cotati consist primarily of agricultural lands, undeveloped hillsides, undeveloped watershed habitat (open space) and creek corridors. Sonoma County has also designated various highways and roadways throughout the unincorporated County as Scenic Corridors. In the vicinity of the project site, SR 116 from Madrone Avenue to SR 1, is a Sonoma County Designated Scenic Corridor; therefore, the project site (Helman Lane and Blodgett Street) is not located near any scenic roadways.

There are no state designated scenic highways within the City of Cotati. While SR 116 is a designated scenic highway, only the portion from SR 1 to Sebastopol, outside of Cotati city limits, is designated as such. Introduction of the proposed project will not damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings viewable from a designated (or eligible) State scenic highway. Therefore, the project will have no impacts to scenic resources visible from designated scenic highways.

5.1(c) (Degrade Visual Character, Conflict with Regulations Governing Scenic Quality) Less Than Significant Impact: Construction of the proposed project would change approximately half of the project site from undeveloped land containing ruderal vegetation, a seasonal wetland, to a developed condition containing a large warehouse building, outdoor storage, parking and landscaping. New development introduced onsite would be visible from Blodgett Street, Laguna de Santa Rosa and possibly Helman Lane, local roadways and adjacent land uses.

The proposed project is subject to Design Review in order to ensure that the architectural style, massing, color and materials, and other design elements of the proposed buildings are compatible with the existing character.

The project would be located within the City Limits and would be compatible with the existing visual character of the area which includes an existing industrial/business park development (north, south and east), rural county development (west), and the channelized Laguna de Santa/Washoe Creek (north and west). Consistent with the City's General Plan the proposed project would introduce storage and warehouses uses on an underutilized parcel

within the City's existing urbanized area. Therefore, potential impacts to the existing visual character of the site and its surroundings would be less than significant.

5.1(d) (Light and Glare) Less Than Significant: The project site is adjacent to existing development and roadways that are current sources of light and glare that contribute to the ambient light conditions. Current sources of light and glare in the vicinity include Blodgett Street street lighting, and surrounding industrial development.

The project will introduce new sources of light and glare including new interior lighting as well as street lights and exterior lighting for the building, outdoor storage and parking areas. New building materials and windows have the potential to increase glare if not properly oriented and/or glazed.

Exterior lights installed in conjunction with the proposed project will result in a minimal increase of artificial light in the immediate vicinity. The proposed project is subject to Design Review to ensure that outdoor lighting and exterior materials/colors minimize the amount of light and glare that would be introduced by the project. Section 17.30.060 of the Cotati Land Use Code requires light fixtures be shielded reduce light bleed to adjoining properties and no light fixture may directly illuminate an area of the site.

While new lighting will be introduced as part of the development, the additional lighting will not adversely affect day or nighttime views in the area and impacts from light and glare will be less than significant.

Mitigation Measures: None Required.

5.2. AGRICULTURAL AND FORESTRY RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Sources: City of Cotati 2015 General Plan; General Plan EIR; and California Department of Conservation Farmland Mapping and Monitoring Program.

Agricultural and Forestry Resources Setting:

The City of Cotati contains approximately 1,104 acres of "Urban and Built-up Land," 77 acres of "Other Land," and 36 acres of "Farmland of Local Importance." According to the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), the project site is designated as "Farmland of Local Importance." Lands adjacent to and surrounding the project site are designated as "Urban and Built-up Land" and "Farmland of Local Importance"). No portion of the project site is under a Williamson Act contract.

In accordance with the definition provided in California Public Resources Code Section 12220(g), "forest land" is land that can support, under natural conditions, 10 percent native tree cover of any species, including hardwoods, and that allows for the preservation or management of forest-related resources such as timber, aesthetic value, fish and wildlife, biodiversity, water quality, recreational facilities, and other public benefits. The project site contains ruderal vegetation, no trees, and does not meet the definition of forest land pursuant to Section 12220(g) of the Public Resources Code None of the land within the project site is zoned as forest land, timberland zone, or timberland zoned Timberland Production.

Agricultural and Forestry Resources Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.2(a-e) (Farmland Conversion, Williamson Act, Forestland, Timberland) No Impact: The parcels that are zoned as CI are designated as "Urban and Built-up Land" and "Farmland of Local Importance." As such, these parcels do not contain important farmlands nor are they under a Williamson Act contract. There are no forestlands, timberlands or such zoning on the CI Zoning District parcels. Therefore, the proposed zoning amendment would have no impacts to agricultural resources or forest uses and would not result in the conversion of such lands since none exist within the CI Zoning District.

Warehouse Building and facilities

5.2(a-e) (Farmland Conversion, Williamson Act, Forestland, Timberland) No Impact: There are no forestlands, important farmlands, agricultural resources or agricultural preserves located within the project site and surrounding properties. The project site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The California Department of Conservation map shows the project site as "Farmland of Local Importance." Lands adjacent to the project site are designated as "Urban and Built-Up Land" and "Farmland of Local Importance." The project site is not under a Williamson Act contract. There are no forestlands, timberlands or such zoning on the subject site or vicinity. The proposed project would have no impacts to agricultural resources or forest uses and would not result in the conversion of such lands since none exist on-site or in the immediate project vicinity. Therefore, the project would have no impact to agricultural and forestry resources. The site is not currently used for agricultural purposes.

Mitigation Measures: None Required.

5.3. AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the	☐	☐	☒	☐

applicable air quality plan?				
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Exposure of sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; BAAQMD 2017 Bay Area Clean Air Plan; BAAQMD CEQA Guidelines 2019; and Evaluation of Air Quality and Greenhouse Gas Emissions, prepared by Illingworth & Rodkin, June 21 2021.

Air Quality Setting:

The project is located in the portion of Sonoma County that is part of the San Francisco Bay Area Air Basin. Ambient air quality standards have been established at both the State and federal level. The Bay Area meets all ambient air quality standards with the exception of ground-level ozone, respirable particulate matter (PM10) and fine particulate matter (PM2.5). In Sonoma County, measured levels of air pollutants are below air quality standards, including ozone, PM10 and PM2.5. High ozone levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NOx). These precursor pollutants react under certain meteorological conditions to form high ozone levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ozone levels. The highest ozone levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources. High ozone levels aggravate respiratory and cardiovascular diseases, reduced lung function, and increase coughing and chest discomfort.

Particulate matter is another problematic air pollutant of the Bay Area. Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM10) and fine particulate matter where particles have a diameter of 2.5 micrometers or less (PM2.5). Elevated concentrations of PM10 and PM2.5 are the result of both region-wide (or cumulative) emissions and localized emissions. High particulate matter levels aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children. Toxic air contaminants (TAC) are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer) and include, but are not limited to, the criteria air pollutants listed above. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and Federal level. Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs (based on the Bay Area average). According to the CARB, diesel exhaust is a complex mixture of gases, vapors and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the state's Proposition 65 or under the Federal Hazardous Air Pollutants programs. The most recent Office of Environmental Health Hazard Assessment (OEHHA) risk assessment guidelines were published in February of 2015.3 See Attachment 1 for a detailed description of the community risk modeling methodology used in this assessment. CARB has adopted and implemented a number of regulations for stationary and mobile sources to reduce emissions of DPM. Several of these regulatory programs affect medium and heavy duty diesel trucks that represent the bulk of DPM emissions from California highways. These

regulations include the solid waste collection vehicle (SWCV) rule, in-use public and utility fleets, and the heavy-duty diesel truck and bus regulations. In 2008, CARB approved a new regulation to reduce emissions of DPM and nitrogen oxides from existing on-road heavy-duty diesel fueled vehicles.4 The regulation requires affected vehicles to meet specific performance requirements between 2014 and 2023, with all affected diesel vehicles required to have 2010 model-year engines or equivalent by 2023. These requirements are phased in over the compliance period and depend on the model year of the vehicle. The Bay Area Air Quality Management District (BAAQMD) is the regional agency tasked with managing air quality in the region. At the State level, the California Air Resources Board (a part of the California Environmental Protection Agency) oversees regional air district activities and regulates air quality at the State level. The BAAQMD has published CEQA Air Quality Guidelines that are used in this assessment to evaluate air quality impacts of projects.

Cotati General Plan:

The 2015 Cotati General Plan Conservation Element includes an extensive list of policies and action measures that are aimed at improving air quality. Additionally, the General Plan Land Use Element and Land Use Map promotes a compact urban development pattern that emphasizes infill development and ensures that land use patterns do to not expose sensitive receptors to unhealthy pollutant concentrations. Additionally, the Circulation Element includes a range of policies and action items that would effectively reduce vehicle travel, through the use of complete streets and multi-modal transportation systems. Applicable General Plan policies include: • Policy CON 2.1: Improve air quality through continuing to require a compact development pattern that focuses growth in and around existing urbanized areas, locating new housing near places of employment, encouraging alternative modes of transportation, and requiring projects to mitigate significant air quality impacts. • Policy CON 2.2: Minimize exposure of sensitive receptors to concentrations of air pollutant emissions and toxic air contaminants. • Policy CON 2.4: Require new development or significant remodels to install fireplaces, stoves, and/or heaters which meet current BAAQMD standards. • Policy CON 2.5: Continue to require all construction projects and ground disturbing activities to implement BAAQMD dust control and abatement measures. • Policy CON 2.7: Continue to aggressively implement the greenhouse gas (GHG) reduction measures contained in the 2008 Cotati Greenhouse Gas Emissions Reduction Action Plan. • Policy CON 3.1: Continue to require all new public and privately constructed buildings to meet and comply with CALGreen Tier 1 standards. • Policy CON 3.2: Support innovative and green building best management practices, including LEED certification, for all new development, and encourage project applicants to exceed CALGreen Tier 1 standards, if feasible. • Policy CON 3.3: Promote the use of alternative energy sources in new development. • Policy CON 3.7: Encourage tree planting, including widespread use of trees as windbreaks to maximize the effects of cooling westerly winds and planting of deciduous trees to help reduce summer temperatures, either in conjunction with new development or through private sector participation. • Policy CON 3.8: Promote water conservation among water users. • Policy CON 3.9: Require the use of drought-tolerant and regionally native plants in landscaping. • Policy CON 3.10: Ensure that the layout and design of new development and significant remodels encourages the use of transportation modes other than automobiles and trucks. • Policy CON 3.16: Improve and maintain landscaping around commercial areas in order to minimize the "heat island" effect, provide shade, soften the harshness of such commercial areas, and create a more leisurely ambience.

Green Building Standards:

CALGreen is a set of mandatory green building standards for new construction that went into effect throughout California on January 1, 2011. The 2013 California Green Building Standards Code went into effect on January 1, 2014. New, more stringent standards went into effect in January 2017. These building standards apply to all new public and privately-constructed commercial and residential buildings. CALGreen is referred to officially as the California Green Building Standards Code and includes a matrix of mandatory requirements tailored to residential and non-residential building classifications, as well as two sets of voluntary measures (CALGreen Tier 1 and Tier 2) that provide a host of more stringent sustainable building practices and features. Cotati's City Council rescinded Cotati's Sustainable Building Program and replaced it with the CALGreen Mandatory plus Tier 1, which includes a detailed list of green building features that address energy efficiency, water efficiency, waste

reduction, material conservation and indoor air quality. The requirements apply to new construction of residential and non-residential facilities. Among the key mandatory provisions are requirements that new buildings: • Reduce indoor potable water use by at least 20% below current standards; • Recycle or salvage at least 50% of construction waste; • Utilize low VOC-emitting finish materials and flooring systems; • Install separate water meters tracking non-residential indoor and outdoor water use; • Utilize moisture-sensing irrigation systems for larger landscape areas; • Mandatory inspections by local officials of building energy systems, such as HVAC and mechanical equipment, to verify performance for non-residential buildings exceeding 10,000 square feet; and • Include parking for fuel-efficient and carpool vehicles.

Table 1. BAAQMD CEQA Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
ROG	54	54	10
NO_x	54	54	10
PM_{10}	82 (Exhaust)	82	15
$PM_{2.5}$	54 (Exhaust)	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	
Health Risks and Hazards	**Single Sources Within 1,000-foot Zone of Influence**	**Combined Sources (Cumulative from all sources within 1000-foot zone of influence)**	
Excess Cancer Risk	>10 per one million	>100 per one million	
Hazard Index	>1.0	>10.0	
Incremental annual $PM_{2.5}$	>0.3 µg/m³	>0.8 µg/m³	
Greenhouse Gas Emissions			
Land Use Projects – direct and indirect emissions	Compliance with a Qualified GHG Reduction Strategy OR 1,100 metric tons annually or 4.6 metric tons per service population *		

Note: ROG = reactive organic gases, NOx = nitrogen oxides, PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less. GHG = greenhouse gases.
*BAAQMD does not have a recommended post-2020 GHG threshold.

Air Quality Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.3(a-d) (Conflict with Applicable Air Quality Plan, Cumulatively Considerable Net Increase of Criteria Pollutant, Expose Sensitive Receptors to Pollutant Concentrations, Other Emissions?) ***No Impact:*** The proposed zoning text amendment does not involve any physical development and would not conflict with the Air Quality Plan for the Region. The amendment provides for an additional type of industrial related use (SW) in an area where other types of light industrial uses are already allowed by the zoning code. However, potential air quality impacts including construction and operation as well as exposure of sensitive receptors would be evaluated on a project by project basis through the Use Permit process at the time such a development application were received. The proposed zoning text amendment would not result in any physical development, nor would it substantially change the types of uses allowed in the CI District (i.e. light industrial uses are currently permitted). Therefore, there would be no significant air quality impacts from the proposed zoning text amendment.

Warehouse Building and Facilities

Illingworth & Rodkin prepared an Evaluation of Air Quality and Greenhouse Gas Emissions for the proposed development project (see **Appendix B**). The results of the evaluation have been incorporated into the impact discussion below.

5.3(a) (Conflict with or obstruct implementation of the Applicable Air Quality Plan?) ***Less Than Significant Impact:*** The BAAQMD adopted the 2017 Bay Area Clean Air Plan (CAP) on April 19, 2017 to comply with state air quality planning requirements set forth in the California Health & Safety Code. The 2017 CAP includes a wide range of control measures designed to decrease emissions of the air pollutants most harmful to Bay Area residents and which include particulate matter (PM), ozone (O_3), and toxic air contaminants (TACs). The CAP further endeavors to reduce emissions of methane and other "super-greenhouse gases (GHGs)" that are potent climate pollutants in the near-term and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

The proposed control strategy for the 2017 CAP consists of 85 distinct measures targeting a variety of local, regional, and global pollutants. The CAP includes control measures for stationary sources, transportation, energy, buildings, and agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Implementation of some of the control measures could involve retrofitting, replacing, or installing new air pollution control equipment, changes in product formulations, or construction of infrastructure that have the potential to create air quality impacts.

The BAAQMD CEQA Guidelines set forth criteria for determining consistency with the CAP. In general, a project is consistent if a) the project supports the primary goals of the CAP, b) includes control measures and c) does not interfere with implementation of the CAP measures.

The proposed project would have a less than significant impact due to a conflict with the Clean Air planning efforts since, a) the project supports the goals of the CAP in that it limits urban sprawl by proposing development within city limits; b) includes control measures to protect air quality during construction by implementing best control measures set forth by BAAQMD; and c) would generate air quality emissions well below the BAAQMD criteria pollutant thresholds (see Section 5.3(b) below). The project would be required to comply with City requirements including applicable General Plan policies and implementing actions. Therefore, the project will have less than significant impacts due to a conflict with the regional air quality plan.

5.3(b) (Cumulatively Considerable Net Increase of Criteria Pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?) ***Less Than Significant with Mitigation*****:** The Bay Area is considered a non-attainment area for ground-level ozone and

PM2.5 under both the Federal Clean Air Act and the California Clean Air Act. The area is also considered nonattainment for PM10 under the California Clean Air Act, but not the federal act. The area has attained both State and federal ambient air quality standards for carbon monoxide. As part of an effort to attain and maintain ambient air quality standards for ozone and PM10, the BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for ozone precursor pollutants (ROG and NOX), PM10, and PM2.5 and apply to both construction period and operational period impacts.

Construction Period Emissions:

The California Emissions Estimator Model (CalEEMod) Version 2020.4.0 was used to estimate emissions from on-site construction activity, construction vehicle trips, and evaporative emissions. The project land use types and size, and anticipated construction schedule were input to CalEEMod. Traffic generated by construction (i.e., off-site construction activities), which included worker trips, vendor deliveries and material hauling trip were computed separately using the CARB EMission FACtors 2021 model (EMFAC2021). 6 The model output from CalEEMod along with construction inputs are included as Attachment 2. EMFAC2017 calculations and outputs are included as Attachment 3.

CalEEMod Inputs

Land Uses

The proposed project land uses were entered into CalEEMod as described in Table 2

Table 2. Summary of Project Land Use Inputs

Project Land Uses	Size	Units	Square Feet	Acreage
Unrefrigerated Warehouse-No Rail	50.06	1,000 sf	50,600	3.40
Parking Lot	45.00	Space	40,000	

Construction Inputs

CalEEMod computes annual emissions for construction that are based on the project type, size, and acreage. The model provides emission estimates for both on-site and off-site construction activities. On-site activities are primarily made up of construction equipment emissions, while offsite activity includes worker, hauling, and vendor traffic. The CalEEMod model develops default construction values for typical construction site scenarios that this project would meet. For this project, the construction schedule and soil hauling volumes were based on data provided by the project applicant. Since the site is undeveloped, there would not be a demolition phase. Equipment usage, worker traffic and vendor traffic were based on the CalEEMod default assumptions. The construction schedule assumed that the earliest possible start date would be October 2021 with the project completed before July 2022. During that period, there would be at least 228 construction workdays. The earliest full year of operation was assumed to be 2023.

Construction Traffic Emissions

Construction would produce traffic in the form of worker trips and truck traffic. The traffic-related emissions are based on worker and vendor trip estimates produced by CalEEMod and haul trips that were computed based on the soil material imported and/or exported to the site, and the estimate of cement and asphalt truck trips. CalEEMod provides daily estimates of worker and vendor trips for each applicable phase. The total trips for those were computed by multiplying the daily rate by the number of days in that phase. Haul trips for demolition and grading were estimated from the provided demolition and grading volumes by assuming each truck could carry 10 tons per load. The number of asphalt total round haul trips was provided for the project and converted to total one-way trips, assuming two trips per delivery. The latest version of the CalEEMod model is based on the older version of the CARB EMFAC 2017 motor vehicle emission factor model. This model has been superseded by the

EMFAC2021 model; however, CalEEMod has not been updated to include EMFAC2021. Therefore, construction traffic information was combined with EMFAC2021 motor vehicle emissions factors to estimate construction site trip emissions. EMFAC2021 provides aggregate emission rates in grams per mile for each vehicle type. The vehicle mix for this study was based on CalEEMod default assumptions, where worker trips are assumed to be comprised of light-duty autos (EMFAC category LDA) and light duty trucks (EMFAC category LDT1and LDT2). Vendor trips are comprised of delivery and large trucks (EMFAC category MHDT and HHDT) and haul trucks, including cement trucks, are comprised of large trucks (EMFAC category HHDT). Travel distances are based on CalEEMod default lengths, which are 10.8 miles for worker travel, 7.3 miles for vendor trips and 20 miles for hauling (demolition material export and soil import/export). Since CalEEMod does not address cement or asphalt trucks, these were treated as vendor travel distances (7.3 miles). Each trip was assumed to include an idle time of 5 minutes. Emissions associated with vehicle starts were also included. On road emissions in Sonoma County for the years 2021-2022 were used in these calculations. Table 3 provides the traffic inputs that were combined with the EMFAC2021 emission database to compute vehicle emissions.

Table 3. Construction Traffic Data Used for EMFAC2021 Model Runs

CalEEMod Run/Land Uses and Construction Phase	Trips by Trip Type			Notes
	Worker Trips[1]	Vendor Trips[1]	Haul Trips[2]	
Vehicle mix[1]	67% LDA 6.4% LDT1 26.6% LDT2	7.1% MHDT 92.9% HHDT	100% HDDT	
Trip Length (miles)	10.8	7.3	20.0 (Demo/Soil) 7.3 (Cement/Asphalt)	CalEEMod default distance with 5-min truck idle time.
Site Preparation	162	-	-	CalEEMod default worker trips.
Grading	495	-	375	3,000-cy soil export. CalEEMod default worker trips.
Trenching	300	-	-	CalEEMod default worker trips.
Building Construction	3,420	1,350	370	CalEEMod default worker and vendor trips with cement truck delivery trips.
Architectural Coating	144	-	-	CalEEMod default worker trips.
Paving	360	-	186	928 cy (93 deliveries) asphalt truck round trips CalEEMod default worker trips.

Notes: [1] Based on 2021-2022 EMFAC20 light-duty vehicle fleet mix for Sonoma County.
[2] Includes grading trips estimated by CalEEMod based on estimated amount of material to be removed. Cement and asphalt trips estimated based on plans provided by the applicant.

Summary of Computed Construction Period Emissions:

Average daily emissions were annualized for each year of construction by dividing the annual construction emissions and dividing those emissions by the number of active workdays during that year. Table 4 shows the annualized average daily construction emissions of ROG, NOX, PM10 exhaust, and PM2.5 exhaust during construction of the project. As indicated in Table 4, predicted annualized project construction emissions would not exceed the BAAQMD significance thresholds during any year of construction.

Table 4. Construction Period Emissions

Year	ROG	NOx	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Construction Emissions Per Year (Tons)				
2021	0.06	0.66	0.03	0.03
2022	0.37	0.93	0.05	0.04
Average Daily Construction Emissions Per Year (pounds/day)				
2021 (88 construction workdays)	1.99	20.92	1.01	0.91
2022 (179 construction workdays)	5.79	14.45	0.74	0.67
BAAQMD Thresholds (pounds per day)	*54* lbs./day	*54* lbs./day	*82* lbs./day	*54* lbs./day
Exceed Threshold?	No	No	No	No

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM10 and PM2.5. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less-than-significant if best management practices are implemented to reduce these emissions. Mitigation Measure AQ-1 would implement BAAQMD-recommended best management practices.

Mitigation Measure AQ-1: **Include measures to control dust and exhaust during construction**.

During any construction period ground disturbance, the applicant shall ensure that the project contractor implement measures to control dust and exhaust. Implementation of the measures recommended by BAAQMD and listed below would reduce the air quality impacts associated with grading and new construction to a less-than-significant level. Additional measures are identified to reduce construction equipment exhaust emissions. The contractor shall implement the following best management practices that are required of all projects: 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph). 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. 8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Effectiveness of Mitigation Measure AQ-1

The measures above are consistent with BAAQMD-recommended basic control measures for reducing fugitive particulate matter that are contained in the BAAQMD CEQA Air Quality Guidelines.

Operational Period Emissions:

Operational air emissions from the project would be generated primarily from autos driven by future employees. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are typical emissions from these types of uses. CalEEMod was used to estimate emissions from operation of the proposed project.

Operational Period Emissions:

Operational air emissions from the project would be generated primarily from autos driven by future employees. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are typical emissions from these types of uses. CalEEMod was used to estimate emissions from operation of the proposed project.

CalEEMod Inputs

Land Uses

The project operational land uses were entered into CalEEMod as described above for the construction period modeling.

Model Year

Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates utilized by CalEEMod. The earliest full year of operation would be 2023.

Traffic Information

CalEEMod allows the user to enter specific vehicle trip generation rates. Therefore, the projectspecific daily trip generation rate provided by the traffic consultant was entered into the model. As described, the project would produce 87 daily trips. Approximately 48 of these would be delivery trips, assumed to be Medium heavy-duty trucks (MHDT) that use diesel. There would be approximately 8 large trucks assumed to be Heavy heavy-duty truck trips powered by diesel. The rest of the vehicles were assumed to be light-duty automobiles (LDT) or light-duty trucks (LDT). The default trip types and lengths specified by CalEEMod were used.

EMFAC2021 Adjustment

The vehicle emission factors and fleet mix used in CalEEMod are based on EMission FACtors from 2021 (EMFAC2021), which is an older CARB emission inventory for on road and off road mobile sources. Since the release of CalEEMod Version 2020.4.0, new emission factors have been produced by CARB. EMFAC2021 became available for use in April 2021. It includes the latest data on California's car and truck fleets and travel activity. Additionally, CARB has recently released EMFAC off-model adjustment factors to account for the Safer Affordable Efficient (SAFE) Vehicle Rule Part one.9,10 The SAFE vehicle Rule Part One revoked California's authority to set its own GHG emission standards and set zero emission vehicle mandates in California. As a result of this ruling, mobile criteria pollutant and GHG emissions would increase. Therefore, the CalEEMod vehicle emission factors and fleet mix were updated with the emission rates and fleet mix from EMFAC2021, which were adjusted with the CARB EMFAC off-model adjustment factors. More details about the updates in emissions calculation methodologies and data are available in the EMFAC2021 Technical Support Document.

Energy

CalEEMod defaults for energy use were used, which include the 2016 Title 24 Building Standards. GHG emissions modeling includes those indirect emissions from electricity consumption. The electricity produced emission rate was modified in CalEEMod. CalEEMod has a default emission factor of 203.98 pounds of CO2 per megawatt of electricity produced, which is based on PG&E's 2019 emissions rate.

Other Inputs

Default model assumptions for emissions associated with solid waste generation and water/wastewater use were applied to the project.

Summary of Computed Operational Emissions

Annual emissions were predicted using CalEEMod and daily emissions were estimating assuming 365 days of operation. Table 5 shows average daily construction emissions of ROG, NOX, total PM10, and total PM2.5 during operation of the project. The operational period emissions would not exceed the BAAQMD significance thresholds.

Table 5. Operational Period Emissions

Scenario	ROG	NOx	PM_{10}	$PM_{2.5}$
2023 Annual Project Operational Emissions (*tons/year*)	0.27	0.41	0.10	0.03
BAAQMD Thresholds (tons /year)	*10 tons*	*10 tons*	*15 tons*	*10 tons*
Exceed Threshold?	*No*	*No*	*No*	*No*
2023 Daily Project Operational Emissions (*pounds/day*)[1]	1.47	2.25	0.56	0.18
BAAQMD Thresholds (pounds/day)	*54* lbs.	*54* lbs.	*82* lbs.	*54* lbs.
Exceed Threshold?	*No*	*No*	*No*	*No*
Notes: [1]Assumes 365-day operation.				

Impact AIR-3: Expose sensitive receptors to substantial pollutant concentrations? Less-Than-Significant Impact.

Project impacts related to increased community risk can occur either by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the project vicinity or by significantly exacerbating existing cumulative TAC impacts. This project would introduce new sources of TACs during construction (i.e., on-site construction and truck hauling emissions) and operation (i.e., standby diesel generator).

Project construction activity would generate dust and equipment exhaust that would affect nearby sensitive receptors. The project would also include truck traffic and a forklift powered by a diesel engine, which would produce TAC and air pollutant emissions.

Project impacts to existing sensitive receptors were addressed for temporary construction activities and long-term operational conditions. There are also several sources of existing TACs and localized air pollutants in the vicinity of the project. The impact of the existing sources of TAC was also assessed in terms of the cumulative risk which includes the project contribution.

Community Risk Methodology for Construction and Operation:

Community risk impacts were addressed by predicting increased cancer risk, the increase in annual PM2.5 concentrations and computing the Hazard Index (HI) for non-cancer health risks. The risk impacts from the project are the combination of risk from construction and operation sources. These sources include on-site construction activity, construction truck hauling, and increased traffic from the project. To evaluate the increased cancer risks from the project, a 30-year exposure period was used, per BAAQMD guidance, with the sensitive receptors being exposed to both project construction and operation emissions during this timeframe.

The project increased cancer risk is computed by summing the project construction cancer risk and operation cancer risk contribution. Unlike, the increased maximum cancer risk, the annual PM2.5 concentration, and HI values are not additive but based on an annual maximum risk for the entirety of the project. The project maximally exposed individual (MEI) is identified as the sensitive receptor that is most impacted by the project's

construction and operation. The methodology for computing community risks impacts is contained in Attachment 1. This involved the calculation of TAC and PM2.5 emissions, dispersion modeling of these emissions, and computations of cancer risk and non-cancer health effects.

Modeled Sensitive Receptors:

Receptors for this assessment included locations where sensitive populations would be present for extended periods of time (i.e., chronic exposures). This includes the nearby existing residences to the north and south of the project site, as shown in Figure 1. Residential receptors are assumed to include all receptor groups (i.e., third trimester, infants, children, and adults) with almost continuous exposure to project emissions.

Community Risks from Project Construction:

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. These exhaust air pollutant emissions would not be considered to contribute substantially to existing or projected air quality violations. Construction exhaust emissions may still pose health risks for sensitive receptors such as surrounding residents. The primary community risk impact issue associated with construction emissions are cancer risk and exposure to PM2.5. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors. A health risk assessment of the project construction activities was conducted that evaluated potential health effects to nearby sensitive receptors from construction emissions of DPM and PM2.5. 13 This assessment included dispersion modeling to predict the offsite and onsite concentrations resulting from project construction, so that increased cancer risks and non-cancer health effects could be evaluated.

Construction Emissions:

The CalEEMod model provided total annual PM10 exhaust emissions (assumed to be DPM) for the off-roadconstruction equipment and for exhaust emissions from on-road vehicles, with total emissions from all construction stages of 0.08 tons (157 pounds). The on-road emissions are a result of haul truck travel during demolition and grading activities, worker travel, and vendor deliveries during construction. A trip length of one mile was used to represent vehicle travel while at or near the construction site. Uncontrolled fugitive PM2.5 dust emissions were calculated by CalEEMod and EMFAC2021 as 0.10 tons (201 pounds) for the overall construction period.

Dispersion Modeling:

The U.S. EPA ISCST3 dispersion model was used to predict DPM and PM2.5 concentrations at sensitive receptors (residences) in the vicinity of the project construction area. The ISCST3 dispersion model is a BAAQMD-recommended model for use in modeling analysis of these types of emission activities for CEQA projects.14,15 Emission sources for the construction site were grouped into two categories: exhaust emissions of DPM and fugitive PM2.5 dust emissions.

To represent the construction equipment exhaust emissions, an area source emission release height of 20 feet (6 meters) was used for the area sources.16 The release height incorporates both the physical release height from the construction equipment (i.e., the height of the exhaust pipe) and plume rise after it leaves the exhaust pipe. Plume rise is due to both the high temperature of the exhaust and the high velocity of the exhaust gas. It should be noted that when modeling an area source, plume rise is not calculated by the AERMOD dispersion model as it would do for a point source (exhaust stack). Therefore, the release height from an area source used to represent emissions from sources with plume rise, such as construction equipment, should be based on the height the exhaust plume is expected to achieve, not just the height of the top of the exhaust pipe.

For modeling fugitive PM2.5 emissions, a near-ground level release height of 7 feet (2 meters) was used for the area source. Fugitive dust emissions at construction sites come from a variety of sources, including truck and equipment travel, grading activities, truck loading (with loaders) and unloading (rear or bottom dumping), loaders and excavators moving and transferring soil and other materials, etc. All of these activities result in fugitive dust

emissions at various heights at the point(s) of generation. Once generated, the dust plume will tend to rise as it moves downwind across the site and exit the site at a higher elevation than when it was generated. For all these reasons, a 7-foot release height was used as the average release height across the construction site. Emissions from the construction equipment and on-road vehicle travel were distributed throughout the modeled area sources.

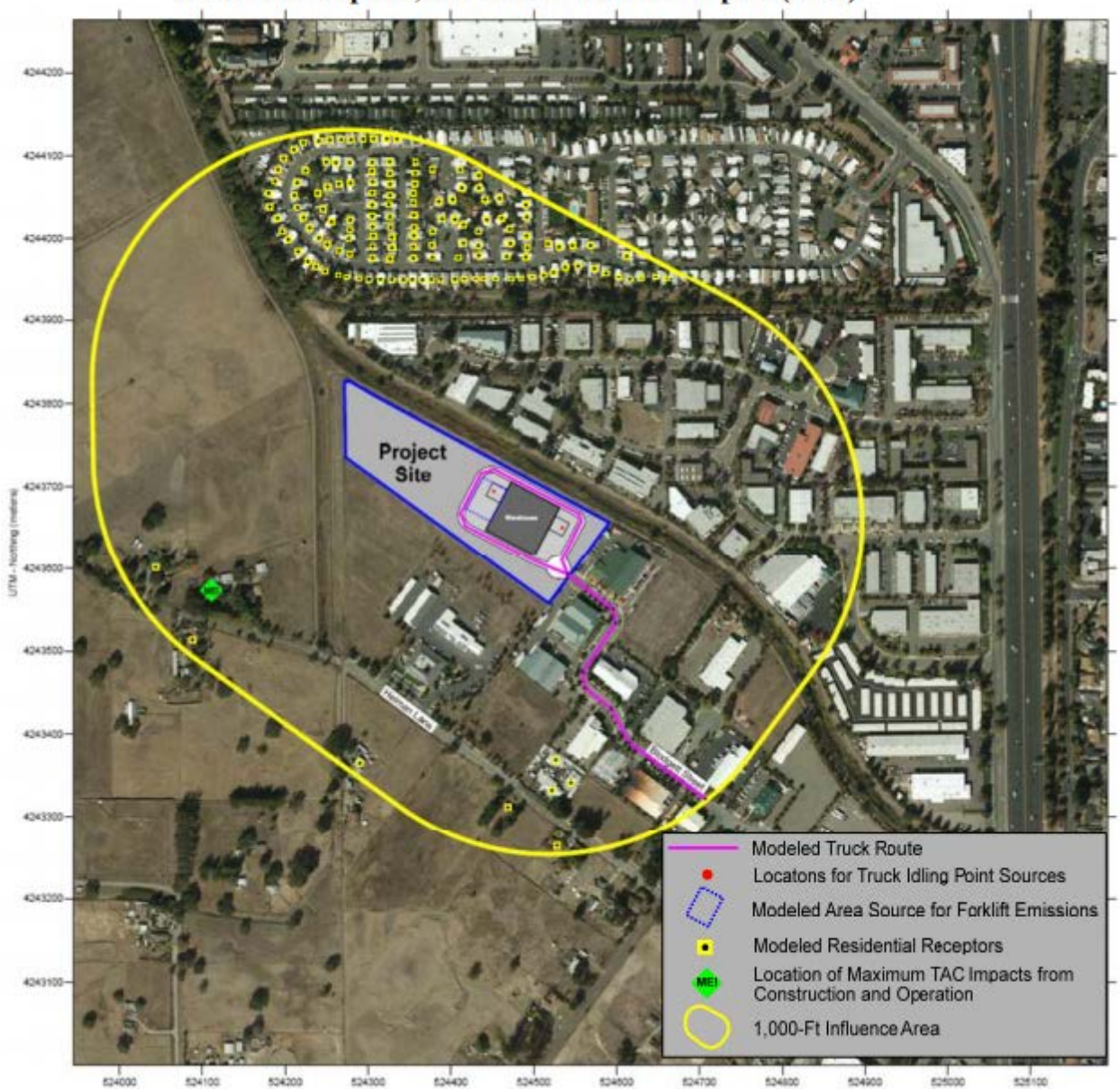
Health risk impacts from construction operation were based on the construction emissions computed by CalEEMod and modeled with the ISCST3 model using 5 years of meteorological data (1990-1994) from the BAAQMD Valley Ford meteorological station The Valley Ford station is about 10 miles west-southwest from the project site. DPM and PM2.5 emissions from construction activities during 2021 and 2022 were modeled as area sources. Concentrations were calculated at nearby residential receptors at a receptor height of 1.5 meters. There are no other sensitive receptor types within 1,000 feet of the project site. Construction was assumed to occur for 9 hours per day (7:00am – 4:00pm).

Summary of Construction Community Risk Impacts:

The increased cancer risk calculations were based on applying the BAAQMD recommended age sensitivity factors to the TAC concentrations, as described in Attachment 1. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing TACs. Infant and adult exposures were assumed to occur at all residences during the entire construction period.

The maximum modeled annual PM2.5 concentration was calculated based on combined exhaust and fugitive concentrations. The maximum computed HI values was based on the ratio of the maximum DPM concentration modeled and the chronic inhalation refence exposure level of 5 µg/m3 . The maximum modeled annual DPM and PM2.5 concentrations, which includes both the DPM and fugitive PM2.5 concentrations, were identified at nearby sensitive receptors to find the MEI. The maximum construction impacts occurred at a residence southwest of the project site (see Figure 1). Table 6 lists the community risks from construction at the location of the residential MEI. Attachment 4 to this report includes the emission calculations used for the construction modeling and the cancer risk calculations.

Figure 1. Location of Project Construction Site, Modeled Project Operations, Off-Site Sensitive Receptors, and Maximum TAC Impact (MEI)



Community Risks from Project Operation – Traffic and Off-Road Equipment:

Operation of the project would have long-term emissions from mobile sources (i.e., truck traffic and forklift). While these emissions would not be as intensive at or near the site as construction activity, they would contribute to long-term effects to sensitive receptors. Operational impacts were calculated for project operation beginning in 2023. Emission sources evaluated included truck travel, truck idling at loading docks, and forklift operation.

Diesel powered vehicles are the primary traffic concern with local traffic-generated TAC impacts. This project would generate approximately 48 delivery (MHDT) and 8 large (HHDT) truck trips assumed to be diesel powered.

Truck travel emissions were calculated for travel on Blodgett Street within 1,000 feet of the project site and for on-site travel. DPM (PM10 exhaust) and PM2.5 (PM2.5 exhaust and tire and brake wear) emissions were calculated using MHDT and HHDT diesel truck aggregate speed emission factors from the EMFAC2021 model for Sonoma County (SF) with the county default vehicle mix. Fugitive PM2.5 paved road dust emissions were calculated using an emission factor from the CTEMFAC2017 model for Sonoma County traffic. Truck travel emissions were modeled using line volume sources. Emissions were assumed to occur 24 hours per day and modeled as such. The road segment used in modeling on- and off-site truck travel is shown in Figure 1.

daily emissions were annualized for each year of construction by dividing the annual construction emissions and dividing those emissions by the number of active workdays during that year. Table 4 shows the annualized average daily construction emissions of ROG, NOX, PM10 exhaust, and PM2.5 exhaust during construction of the project. As indicated in Table 4, predicted annualized project construction emissions would not exceed the BAAQMD significance thresholds during any year of construction.

Truck idling is expected to occur at the project loading docks for arriving and departing trucks. There are two loading docks at the project warehouse, one on the east side of the warehouse and the other on the west side. MHDT and HHDT truck idling DPM and PM2.5 emissions were calculated based on EMFAC2021 emission factors for travel at 5 mph and assuming 5 minutes idle per trip for a total of 10 minutes per truck visiting the site. Idling emissions were modeled using two point sources, one at each loading dock (see Figure 1). Emissions were assumed to occur 24 hours per day. Idle emission calculations and emission source parameters are contained in Attachment 4. Dispersion modeling was conducted for operational sources in the same manner as described above for construction activities.

Summary of Project-Related Community Risks at the Offsite Project MEI:

The risk impacts from a project are the combination of construction and operation sources. These sources include on-site construction activity, project forklift, and increased truck traffic from the project. The project impact is computed by adding the construction cancer risk for an infant to the increased cancer risk for the project operational conditions for the roadway and forklift at the MEI over a 30-year period. The project MEI is identified as the sensitive receptor that is most impacted by the project's construction and operation.

Summary of Project-Related Community Risks at the Offsite Project MEI The risk impacts from a project are the combination of construction and operation sources. These sources include on-site construction activity, project forklift, and increased truck traffic from the project. The project impact is computed by adding the construction cancer risk for an infant to the increased cancer risk for the project operational conditions for the roadway and forklift at the MEI over a 30-year period. The project MEI is identified as the sensitive receptor that is most impacted by the project's construction and operation.

Project risk impacts are shown in Table 6. The maximum increased cancer risks, maximum PM2.5 concentration, and health hazard indexes from construction at the MEI do not exceed their respective BAAQMD single-source thresholds.

Table 6. Project Construction and Operation Risk, and Cumulative Risk Impacts at the Off-Site Project MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Impacts			
Project Construction:			
Year 1-2 Unmitigated	5.2 (infant)	0.06	0.01
Project Operation:			
Trucks Years 2-30 Unmitigated	0.2 (infant)	<0.01	<0.01
Forklift Years 2-30 Unmitigated	1.9 (infant)	<0.01	<0.01
Project Total/Maximum:			
Unmitigated	7.3 (infant)	0.06	0.01
BAAQMD Threshold – Project Sources	**10**	**0.3**	**1.0**
Exceed Threshold?	No	No	No

Cumulative Community Risks of all TAC Sources at the Off-Site Project MEI:

Community health risk assessments typically look at all substantial sources of TACs that can affect sensitive receptors that are located within 1,000 feet of a project site (i.e., influence area). These sources include freeways or highways, rail lines, busy surface streets, and stationary sources identified by BAAQMD.

A review of the project area and based on provided traffic information indicated that no roadways within the influence area would have traffic exceeding 10,000 vehicles per day. A review of BAAQMD's stationary source map website identified three stationary sources with the potential to affect the project MEI. Figure 2 shows the location of the sources affecting the MEI. Community risk impacts from these sources upon the MEI reported in Table 6. Details of the cumulative modeling and community risk calculations are included in Attachment 5.

BAAQMD Permitted Stationary Sources Permitted stationary sources of air pollution near the project site were identified using BAAQMD's Permitted Stationary Sources 2018 GIS website,17 which identifies the location of nearby stationary sources and their estimated risk and hazard impacts, including emissions and adjustments to account for new OEHHA guidance. Three sources were identified using this tool with one source being a gas dispensing facility and the other two sources unknown. A Stationary Source Information Form (SSIF) containing the identified sources was prepared and submitted to BAAQMD. BAAQMD provided input and clarification about the stationary sources.18 BAAQMD identified Sources #8674 and #10411 as permit shutdowns, so these two

sources we not assessed.

Figure 2. Project Site and Nearby TAC and $PM_{2.5}$ Sources

BAAQMD Permitted Stationary Sources:

Permitted stationary sources of air pollution near the project site were identified using BAAQMD's Permitted Stationary Sources 2018 GIS website,17 which identifies the location of nearby stationary sources and their estimated risk and hazard impacts, including emissions and adjustments to account for new OEHHA guidance. Three sources were identified using this tool with one source being a gas dispensing facility and the other two sources unknown. A Stationary Source Information Form (SSIF) containing the identified sources was prepared and submitted to BAAQMD. BAAQMD provided input and clarification about the stationary sources.18 BAAQMD identified Sources #8674 and #10411 as permit shutdowns, so these two sources we not assessed.

The screening level risks and hazards provided by BAAQMD for the one stationary source was adjusted for distance using BAAQMD's Distance Adjustment Multiplier Tool for Gas Dispensing Facilities. Community risk impacts from the stationary sources upon the MEI are reported in Table 7.

Summary of Cumulative Risks at the Project MEI:

Table 7 reports both the project and cumulative community risk impacts at the sensitive receptors most affected by construction (i.e., the MEI). The project's community risk from project construction and operational activities would not exceed the maximum increased cancer risk, maximum PM2.5 concentration, or HI single-source

thresholds. In addition, the combined project and cumulative sources impacts would not exceed the cumulative-source thresholds.

Table 7. Cumulative Community Risk Impacts at the Location of the Project MEI

Source		Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Impacts				
Total/Maximum Project Impact	Unmitigated	7.3 (infant)	0.06	0.01
BAAQMD Single-Source Threshold		***10***	***0.3***	***1.0***
Exceed Threshold?	Unmitigated	*No*	*No*	*No*
Cumulative Sources				
Marin/Sonoma Mosquito & Vector Control (Facility ID #100856, Gas Dispensing Facility), MEI at 1000+ feet		<0.1	-	-
Combined Sources	Unmitigated	<7.4	0.06	0.01
BAAQMD Cumulative Source Threshold		***100***	***0.8***	***10.0***
Exceed Threshold?	Unmitigated	*No*	*No*	*No*

5.3(d) (Other Emissions) Less Than Significant Impact: There may occasionally be other emissions which could lead to localized odors during site development associated with construction equipment, paving and the application of architectural coatings. Any emissions that lead to odors generated during construction would be temporary and not likely to be noticeable beyond the immediate construction zone. As a warehouse to be used by a moving and storage company operation of the project will not create other emissions adversely affecting a substantial number of people. Therefore, the project will have less than significant impacts to air quality due to other emissions.

5.4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (Formerly Fish and Game) or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations, or by the California Department of Fish and Wildlife (formerly Fish and Game) or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or	☐	☐	☒	☐

other means?

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; Santa Rosa Plain Conservation Strategy, prepared by U.S. Fish and Wildlife Service, December 2005; Recovery Plan for the Santa Rosa Plain, prepared by U.S. Fish and Wildlife Service, May 2016; Biological Resource Analysis, prepared by Dana Riggs, Sole Ecology, February 16, 2021 and email from Dana Riggs, Sole Ecology to Department of Fish and Wildlife dated July 21, 2021; Letter from Sol Ecology to Bert Sandell, June 24, 2021; project plans dated May 24, 2021; California Department of Fish and Wildlife MND comment letter dated July 20, 2021.

Biological Resources Setting:

Biological resources are protected by state and federal statutes including the Federal Endangered Species Act (FESA), the California Endangered Species Act (CESA), the Clean Water Act (CWA), and the Migratory Bird Treaty Act (MBTA). These regulations provide the legal protection for plant and animal species of concern and their habitat at the state and federal level. As reported in the General Plan, the biological diversity within the City limits includes agriculture (63 acres), annual grassland (87 acres), and freshwater emergent wetland (2 acres).

The project site, like of much of Cotati and Sonoma County, is designated as critical habitat for California tiger salamander (CTS). The CTS was federally listed as endangered in 2003 and state-listed as a threatened species in 2010. In 2011, the USFWS designated revised critical habitat for the Sonoma County "Distinct Population Segment" of the California tiger salamander. In total, approximately 47,383 acres of land were designated as critical habitat for the Sonoma County "Distinct Population Segment" of the California tiger salamander under the revised Final Rule. The project site is within the mapped critical habitat.

CTS occur in grasslands and open oak woodlands that provide suitable aestivation (over summering) and/or breeding habitats. They spend most of their lives underground and typically only emerge from their subterranean refugia for a few nights each year during the rainy season to migrate to breeding ponds. The maximum migration distance of California tiger salamanders to/from their breeding pools to upland over-summering habitat is typically 1.3 miles.

In Sonoma County, subterranean refugia likely include Botta's pocket gopher (*Thomomys bottae*) burrows, deep fissures in desiccated clay soils, and debris piles (e.g., downed wood, rock piles). Stock ponds, seasonal wetlands, and deep vernal pools typically provide most of the breeding habitat used by California tiger salamanders. Occasionally, they are found breeding in slow moving streams or ditches. Seasonal wetlands that are used for breeding typically must hold water into the month of May to allow enough time for larvae to fully metamorphose. Typically, in Sonoma County pools that are 16 inches or deeper in the peak winter months will remain inundated long enough to provide good breeding conditions for California tiger salamanders. Late spring rainfall events often allow California tiger salamanders to successfully breed in shallower pools.

A site-specific Biological Resource Analysis was prepared by Sole Ecology (**Appendix C**). On January 12, 2021, Sol Ecology, Inc. (Sol Ecology) performed a biological resources survey at 597 Helman Lane in Cotati, Sonoma County, California (Project Study Area, see Appendix A – Figure 1). The purpose of the survey was to gather information necessary to complete a review of potential biological resource impacts from development of the proposed project, under the guidelines of the California Environmental Quality Act (CEQA) for the County of Sonoma Permit and Resource Management Department and other applicable state and federal regulations. This report describes the results of the Project Study Area survey and assessment for the presence of sensitive biological resources protected by local, state, and federal laws and regulations. This report also contains an evaluation of potential impacts to sensitive biological resources that may occur from the proposed project and potential mitigation measures to compensate for those impacts as warranted. This report is based on information available at the time of the study and on-site conditions that were observed on the dates of the site visits.

On January 12, 2021, the Project Study Area was traversed on foot to determine the presence of (1) plant communities both sensitive and non-sensitive, (2) special status plant and wildlife species, (3) presence of essential habitat elements for any special status plant or wildlife species, and (4) a preliminary assessment of the presence and extent of wetland and non-wetland waters.

Literature Review

To evaluate whether special status species or other sensitive biological resources(e.g., wetlands) could occur in the study area and vicinity, Sol Ecology biologists reviewed the following: ● California Native Plant Society's (CNPS's) Inventory of Rare and Endangered Plants of California search for U.S. Geological Survey (USGS) 7.5-minute Cotati quadrangle and eight adjacent quadrangles (CNPS 2021a); ● California Natural Diversity Database (CNDDB) records search for USGS 7.5-minute Cotati quadrangle and eight adjacent quadrangles (California Department of Fish and Wildlife [CDFW] 2021); ● U.S. Fish and Wildlife Service (USFWS) list of threatened and endangered species for the Project Study Area (IPaC) (USFWS 2021a); ● CDFG publication "California's Wildlife, Volumes I-III" (Zeiner et al. 1990) ● CDFG publication California Bird Species of Special Concern (Shuford and Gardali 2008) ● CDFW and University of California Press publication California Amphibian and Reptile Species of Special Concern (Thomson et al. 2016) ● USFWS National Wetlands Inventory, Wetlands Mapper (USFWS 2021b); and ● U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS), Web Soil Survey (USDA 2019).

Based on information from the above sources, Sol Ecology developed lists of special status species and natural communities of special concern that could be present in the Project vicinity (Appendix B of this report). Figures 2 and 3 present the results of a 5-mile CNDDB record search around the study area for special status plants and wildlife (Appendix A of this report). All biological resources are evaluated for their potential to occur within the study area in Section 3.0 of this report.

Field Survey

Sol Ecology biologists conducted biological resource surveys on January 12, 2021. Field surveyor qualifications are in Appendix C of the report. Biologists walked throughout the entire study area identifying all plant and wildlife species encountered and mapping vegetation communities. Plant species were recorded and identified to a taxonomic level sufficient to determine rarity using the second edition of the Jepson Manual (Baldwin et al. 2012). All plant species observed in the study area are included in Appendix D of the report – Observed Species Table. Vegetation communities were identified using the online version of A Manual of California Vegetation (CNPS 2021b). Dispersal habitat,Sandell Warehouse Project Sol Ecology, Inc. Biological Resources Report February 2021 3 foraging habitat, refugia or estivation habitat, and breeding (or nesting habitat) were noted for wildlife species.

In cases where little information is known about species occurrences and habitat requirements, the species evaluation was based on best professional judgment of Sol Ecology biologists with experience working with the species and habitats. If a special status species was observed during the site visit, its presence is recorded and

discussed. For some threatened and endangered species, a site survey at the level conducted for this report may not be sufficient to determine presence or absence of a species to the specifications of regulatory agencies.

Protocol-level special status plant surveys were performed within the Study Area on March 16, April 14, and May 13, 2021. Surveys were performed by walking throughout the entire Study Area. Surveys were conducted during the appropriate season and were floristic in nature. All plants encountered during the surveys were identified to the highest taxonomic level necessary to determine rarity. The Jepson Manual was consulted for detailed biological, distributional, and phenological information, and used as a standard for nomenclature. All special status plant populations and sensitive communities, if found, were mapped using a handheld Global Positioning System (GPS) unit with sub-meter accuracy. No special status plant species were observed during the 2021 special status plant surveys within the Study Area. Table 2 lists all the plant species observed within the Study Area during 2021 special status plant surveys.

On January 12, 2021, Sol Ecology performed a preliminary wetland assessment to confirm the current presence and extent of previously delineated wetlands within the study area had not changed. A formal wetland delineation was conducted in 2008 (Macmillan 2008). In 2008, Lucy Macmillan identified wetland and non-wetland waters potentially subject to regulation by the federal government (U.S. Army Corps of Engineers [USACE]) and the state of California (Regional Water Quality Control Board [RWQCB] and CDFW). A Jurisdictional Determination was issued by the USACE on June 3, 2010. The delineation of wetland boundaries was based on the presence/absence of indicators of hydrophytic vegetation, hydric soil, and wetland hydrology. The boundaries of non-wetland waters were identified by locating the ordinary high-water mark (OHWM).

Results

Existing Conditions and General Wildlife Use-Elevations within the Project Study Area range from approximately 27 to 30 meters (91 to 99 feet) above mean sea level. The Project Study Area encompasses two soil map units identified by the USDA, NRCS (USDA 2019):

- Clear Lake clay, sandy substratum, drained, 0 to 2 percent slopes, MLRA 14: This soil map unit is poorly drained and occurs on basin floors. The soil parent material is basin alluvium derived from volcanic and sedimentary rock over fan alluvium derived from volcanic and sedimentary rock. Clear lake clay is rated as a hydric soil. Minor components include Haire (5%), Whight (5%), and Reyes (5%).
- Hair fine Sandy loam, hummocky, 0 to 5 percent slopes. The soil parent material is alluvium derived from sedimentary rock. Minor components include Zamora (10%) and Clear Lake (5%).

Vegetation communities present in the study area were classified using the online version of A Manual of California Vegetation (CNPS 2021b). However, in some cases it is necessary to identify variants of community types or to describe non-vegetated areas that are not described in the literature. Vegetation communities were classified as non-sensitive or sensitive natural communities as defined by CEQA and other applicable laws and regulations. Photographs of the study area are provided in Appendix E of this report.

Non-Sensitive Natural Communities

California Annual Grassland California annual grassland - is continuous throughout the herbaceous layer within the Project Study Area. The study area is regularly disked and therefore, the grassland community has developed following repeated disturbance. The grassland community consists primarily of non- native (invasive) annual grasses and non-native forbs. Non-native annual grass species observed include oats (Avena sp.), rye grass (Festuca perennis), and soft chess (Bromus hordeaceus). Non- native forb species observed within the grassland include bristly ox-tongue (Helminthotheca echioides), carrot (Daucus carota), and radish (Raphanus sativus).

Sensitive Natural Communities

Seasonal Wetlands -Approximately 0.88 acres of seasonal wetlands were delineated within the Project Study Area in 2008, verified by the USACE on June 3, 2010 (File No. SPN-2001-25967-N). The seasonal wetlands were dominated by hydrophytic vegetation including buttercup (Ranunculus muricatus), rye grass, semaphore grass (Pleuropogon californicus), and soft chess. Hydric soils within the seasonal wetlands displayed a depleted matrix (10YR 3/2 or 3/1) with heavy mottling and/or oxidized rhizospheres in the top 10 inches. The presence of a biotic crust (algal matting) was the primary Indicator of hydrology within the wetlands (Macmillan 2008).

Special Status Plants

Special status plant species include plant species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the Federal Endangered Species Act (ESA) or California Endangered Species Act (CESA). These acts afford protection to both listed species and those that are formal candidates for listing. Plant species on CNPS' Inventory of Rare and Endangered Plants of California with California Rare Plant Ranks of 1 and 2 are also considered special status plant species and must be considered under CEQA. Further, California Rare Plant Ranks 3 and 4 are evaluated within this report to ensure locally important plant species are included for impact significance.

Botanical surveys were performed in accordance with the Plant Survey Protocol specified in the Santa Rosa Plain Conservation Strategy (Conservation Strategy 2017) on the approximately 8- acre property in 2008 and in 2009 by Roy Buck, EcoSystems West Consulting Group and in 2018 by Jane Valerius Environmental Consulting. The surveys were performed over the entire site, including wetlands mapped on the western and southern borders and were floristic in nature as required in the protocol. Target species included Sonoma sunshine (Blennosperma bakeri), Burke's goldfields (Lasthenia burkei), and Sebastopol meadowfoam (Limnanthes vinculans). Three surveys were performed in each of the survey years and corresponded with the peak blooming period when these species would be identifiable. No special status plants were ever observed.

Based upon a review of the resources and databases given in Section 2.1, 84 special status plant species have been documented within a 9-quad search of the study area (Appendix B of the report). Based on the presence of vegetation communities described above and soils at the site, the presence of active cultivation for the last 20 years or more, and negative findings during protocol-level surveys in 2008, 2009, and 2018, the site is unlikely to support any of the special status species found in similar habitats within the vicinity. Other special status plant species documented within the 9-quad search are unlikely or have no potential to occur in the study area for one or more of the following reasons:

> ● Hydrologic conditions(e.g., vernal pools, bogs and fens, freshwater marshes and swamps) necessary to support the special status plants do not exist on site. ● Edaphic (soil) conditions (e.g., sandy, rocky, gravelly, talus) necessary to support the special status plants do not exist on site. ● Topographic conditions (e.g.,slopes) necessary to support the special status plants do not exist on site. ● Unique pH conditions (e.g., serpentine) necessary to support the special status plant species are not present on site. ● Associated vegetation communities (e.g., chaparral, coastal bluffs, oak woodland, conifer forest) necessary to support the special status plants do not exist on site.

Special Status Wildlife

In addition to wildlife listed as federal or state endangered and/or threatened, federal and state candidate species, CDFW Species of Special Concern, CDFW California Fully Protected species, USFWS Birds of Conservation Concern, and CDFW Special-status Invertebrates are all considered special status species. Although these species generally have no special legal status, they are given special consideration under CEQA. The federal Bald and Golden Eagle Protection Act also provides broad protections to both eagle species that are roughly analogous to those of listed species. Bat species are also evaluated for conservation status by the Western Bat Working Group (WBWG), a non-governmental entity; bats named as a "High Priority" or "Medium Priority" species for

conservation by the WBWG are typically considered special status and considered under CEQA; bat roosts are protected under CDFW Fish and Game Code. In addition to regulations for special status species, most native birds in the United States(including non-status species) are protected by the federal Migratory Bird Treaty Act of 1918 (MBTA) and the California Fish and Game Code (CFGC), i.e., sections 3503, 3503.5 and 3513. Under these laws, deliberately destroying active bird nests, eggs, and/or young is illegal.

Based on the databases given in Section 2.1 of the report, 48 special status wildlife species have been documented within a 9-quad search of the study area (Appendix B of the report). Based on the presence of biological communities described above, and as identified by the California Department of Fish and Wildlife as included in their letter dated July 20, 2021 to the City of Cotati, the Project Study Area has the potential to support three (3) of these species, one of which is both federal and state listed (Table 1). The remaining species found in the database search are unlikely or have no potential to occur for one or more of the following reasons:

● Limited small mammal forage habitat for raptors and other species due to annual disking.. ● No suitable roosting habitat such as barns, old buildings, or large snags (e.g., for Townsend's big-eared bat or pallid bat). ● No suitable coastal prairie or vernal pool habitat (e.g., obscure bumble bee). ● No suitable stream or pond habitat (e.g., for foothill yellow-legged frog, California red- legged frog, California freshwater shrimp or western pond turtle); note that the Laguna de Santa Rosa may support pond turtle, however Sonoma County Water Agency chain-link fencing located along the southern boundary of the Laguna prevents pond turtle from accessing the site. ● No suitable riparian, freshwater marsh, woodland, or forest habitat (e.g., western yellow-billed cuckoo, tricolored blackbird, Northern spotted owl).

Table 1. Special Status Wildlife with Potential to Occur in the Study Area

Scientific Name/ Common Name	Status[1]	Habitat	Potential for Occurrence
Birds			
white-tailed kite (WTK) *Elanus leucurus*	CFP	Year-round resident in coastal and valley lowlands with scattered trees and large shrubs, including grasslands, marshes, and agricultural areas. Nests in trees, of which the type and setting are highly variable. Preys on small mammals and other vertebrates.	**Moderate potential**. Suitable nesting substrate is not present in the project study area, though a few sparse trees and shrubs around the perimeter may. Suitable foraging habitat is present.
Amphibians and Reptiles			
California tiger salamander (CTS) *Ambystoma californiense*	FE, ST	Inhabits grassland, oak woodland, ruderal and seasonal pool habitats. Adults are fossorial and utilize mammal burrows and other subterranean refugia. Breeding occurs primarily in vernal pools and other seasonal water features.	**Moderate potential.** Wetland habitats on the site are seasonal in nature and do not likely pond for a sufficient duration to support breeding. Suitable upland habitat is present. The site is surrounded by multiple CTS occurrences, the nearest of which is approximate 800 feet to the south. The project study area provides only marginal upland habitat due to annual land use practices. Burrow density is relatively low except on the outer perimeter on the western and northwestern side of the property.

[1] FE/SE – Federal/State Endangered; FT/ST – Federal/State Threatened
SCE/T – State Candidate Endangered/Threatened; CFP – California Fully Protected
SSC – Species of Special Concern; BCC – Bird of Conservation Concern
SSI – Special Status Invertebrate; LC – Species of Local Concern
WBWG – Western Bat Working Group – Medium or High Priority Species

(Burowing owl (BO) *Athene cunicularia* is included as a part of Table 1. based upon the recommendation of the CDFW due to the mapping of suitable soil on adjacent property for wintering refugia for burrowing owl).

Potential Impacts and Mitigation

The assessment of impacts under CEQA is based on the change caused by the Project relative to the existing conditions within the Project Study Area. In applying CEQA Appendix G, the terms "substantial" and "substantially" are used as the basis for significance determinations in many of the thresholds but are not defined qualitatively or quantitatively in CEQA or in technical literature. In some cases, the determination requires application of best professional judgment based on knowledge of site conditions as well as the ecology and physiology of biological resources present in a given area. The CEQA and State CEQA Guidelines defines "significant effect on the environment" as "a substantial adverse change in the physical conditions which exist in the area affected by the proposed project." Pursuant to Appendix G, Section IV of the State CEQA Guidelines, the proposed Project would have a significant impact on biological resources if it would:

> A. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. B. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service. C. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. D. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. E. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Biological Resources Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.4(a-f) (Sensitive Species and Habitats, State or Federally Protected Wetlands, Wildlife Movement, Conflict with Local Policies or Ordinances) Less Than Significant Impact: As shown on General Plan Figure 5.1, Sensitive Habitat and Species, all parcels within the CI Zoning District are designated as critical habitat for CTS. The proposed zoning text amendment would not result in any physical development at this time. As such there would be no impacts to special-status plants, special-status wildlife, riparian habitat, wetlands, protected trees, or other biological resources. Allowing SW within the CI Zoning District would conditionally permit similar uses that are currently allowed within the existing zoning regulation (e.g., commercial, retail/industrial). In the future should SW uses be proposed, such a development application would be required to comply with all state and federal statutes related to the protection of biological resources, including the Federal Endangered Species Act, the California Endangered Species Act, Migratory Bird Treaty Act, and the Santa Rosa Plain Conservation Strategy Plan and the Recovery Plan. If warranted, a Biological Resources Evaluation would be required through the Use Permit process to identify site-specific biological resources and recommend mitigation measures. The parcels where the zoning text amendment would apply already allow for other types of development consistent with the General Plan. General Plan land use designation, policies, programs and mitigation provides for the protection of biological resources. The proposed zoning text amendment does not does not substantially alter the City's land use regulation on these parcels. Therefore, there would be no impacts related to biological resources from the zoning text amendment.

Warehouse Building and Facilities

5.4(a-b) (Adverse Effects to Sensitive Species and Habitats) Less Than Significant with Mitigation: Sensitive Natural Communities - Seasonal wetlands are sensitive natural communities occurring within the Project Study Area. The seasonal wetlands within the study area are regulated by the USACE and RWQCB. Project activities resulting in fill or modification (including diversion) of seasonal wetlands within the study area must be authorized by the USACE pursuant to Section 404 of the Clean Water Act, and the RWQCB pursuant to Section 401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act. Based on preliminary calculations, approximately 0.88 acre of seasonal wetland habitat is present and will be avoided by the proposed project as shown in Appendix A. A minimum 30-foot setback from the top of bank of the Laguna de Santa Rosa is provided. The Laguna de Santa Rosa is separated from the project site by a maintained levee road and chain link fence. Approximately one half of the proposed project activities will be setback 50 feet or more from any jurisdictional seasonal wetland habitat. The closest point proposed project activities will come to seasonal wetlands is approximately 25 feet at along the southern perimeter access road. Impacts to wetland habitat is considered significant under CEQA; based on the current site plan the proposed project will have no effect on any sensitive natural communities.

Special-Status Plant Species

A total of eight (8) protocol-level surveys conducted in 2008, 2009, and 2018 concluded no special status species are present, including those listed species potentially present in seasonal wetland habitat. Given that no special status plant species have been previously observed during protocol-level surveys and seasonal wetland habitat will be completely avoided, no impacts to special status plants are anticipated.

Special-Status Wildlife Species

Three special status wildlife species have potential to occur within the Project Study Area: white- tailed kite, California tiger salamander and burrowing owl. In addition, the study area provides suitable nesting substrate for several migratory bird species protected under the MBTA.

Migratory Birds and White-Tailed Kite (WTK0)

The Project Study Area provides suitable nesting substrate (trees, shrubs, grasses) for many non- status migratory birds. Annual disking likely precludes most species from nesting on the site. However, proposed construction activities have the potential to impact nesting birds if present adjacent to activities. Impacts to nesting birds resulting in nest abandonment or direct mortality to chicks or eggs is considered a significant impact under CEQA.

California Tiger Salamander (CTS)

The Project Study Area provides suitable upland estivation habitat for CTS and is within 2,200 feet of at least two breeding occurrences, the nearest of which is approximately 800 feet from the south end of the site. Little burrowing habitat is present due to agricultural practices on the site. Nonetheless, the project has the potential to impact CTS given proximity to nearby occurrences and the absence of any barriers to dispersal. Given this species is both federal and state listed, any direct mortality is considered significant under CEQA. Impacts to CTS may occur during ground-disturbing activities if present. Because the site is bounded by the Laguna de Santa Rosa and the proposed project will be designed to be close to existing development on Blodgett Ct, the project will not result in any permanent barrier to dispersing adults. The site itself is not within any obvious corridor between breeding occurrences and likely represents only limited upland estivation habitat for CTS the breed in the vicinity.

The project would result in the adverse modification of critical habitat for CTS given its location on the Santa Rosa Plain. A total of approximately 7.0 acres of upland habitat would be affected by the proposed project. On June 2, 2021, the California Department of Fish and Wildlife submitted a letter to the applicant stating that the

Incidental Take Permit had been submitted and determined the application to be complete (ITP Application No. 2081-2021-032-03).

Burrowing Owl (BO)

The burrowing owl is identified by CDFW as a Species of Special Concern. The project is within the wintering distribution of burrowing owl (Athene cunicularia) and adjacent to grasslands that may be suitable wintering habitat for the species (Klute et al. 2003). Suitable sandy loam soils for badger dens are mapped within the distance at which burrowing owls could be impacted (500 meters or 1,640 feet) according to the U.S. Department of Agriculture Web Soil Survey mapping online tool (see: https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm), and badgers may create dens within a single day (Ministry of Environment Ecosystems 2007 as cited in Brehme et al. 2015) which can provide suitable wintering refugia for burrowing owl. Therefore, burrowing owls could occupy suitable wintering refugia in adjacent habitat prior to project construction. The California Natural Diversity Database (CNDDB) documents a burrowing owl observed: 1) in 2002 approximately 1.9 miles east of the project site, and 2) in 2017 at the Sonoma County Airport, confirming the species has occurred in the vicinity of the project site and could occupy suitable refugia in adjacent habitat.

The mapped sandy loam soil adjoins the project site to the south and is approximately one-acre in size with an approximate elevation of 95 feet. The mapped area is located on publicly-owned land occupied by the Marin/Sonoma Mosquito and Vector Control District facilities. The mapped area is located at the rear of the facility and is vacant, flat grassland with oak, redwood and poplar trees (15 trees 30' to 50' in height) scattered generally along the northern and eastern boundaries.

The Burrowing Owl is primarily a grassland species, but it persists and even thrives in some landscapes highly altered by human activity (Thomsen 1971, Haug et al. 1993, Millsap 2002, Gervais et al. 2003, Rosenberg and Haley 2004). The overriding characteristics of suitable habitat appear to be burrows for roosting and nesting and relatively short vegetation with only sparse shrubs and taller vegetation (Green and Anthony 1989, Haug et al. 1993).

Because of their need for open habitat with low vegetation, burrowing owls also are unlikely to persist in agricultural lands dominated by vineyards and orchards. Burrowing owls avoid thick, tall vegetation, brush, and trees. They nest in some of California's urban environments and are forced to rely on less natural habitats as native grassland disappears. The elevation range of the burrowing owl as stated in the Department of Fish and Wildlife Diversity Data base is 160 feet to 2,400 feet. The Project site is located an elevation of approximately 95 feet.

In general, due to the proximity to trees, and the few number of documented occurrences in Sonoma County, the likelihood for an occurrence on the subject property or adjacent properties is low, but the potential exists.

The project may result in reduced health and vigor, or mortality, of owls resulting wintering burrow abandonment caused by audio and visual disturbances from project construction activities. Burrowing owl is a California Species of Special Concern and protected under Fish and Game Code sections 3503 and 3503.5 and the federal Migratory Bird Treaty Act. Therefore, project impacts to burrowing owl would be potentially significant and mitigation measure BIO-13 has been included to mitigate the impacts to less than significant.

Mitigation Measure BIO-1. Nesting Bird Surveys. If construction begins during the breeding bird season between February 1 and August 31, the following is recommended to ensure potentially significant impacts to migratory nesting birds and raptors (including WTK) are avoided: • Pre-construction nesting bird surveys should be performed within the study area and up to 500 feet of proposed activities. The survey shall be required within no more than 7 days prior to construction, and if a lapse of 7 days or more in construction occurs, another survey shall be conducted. Any active nests shall be monitored by a qualified biologist daily at a minimum for the first week to ensure the buffer is adequate to avoid nest disturbance, and then weekly thereafter. Any impacts to

nesting birds shall be reported to CDFW within 24 hours. • If nests are found, a no-disturbance buffer should be placed around the nest until young have fledged or the nest is determined to be no longer active by the biologist. The size of the buffer may be determined by the biologist based on species, ambient conditions, and proximity to project-related activities. Larger buffers are not likely necessary due to ambient conditions.

Mitigation Measure BIO-2. Section 2081 Permitting and Compensatory Mitigation. Section 2081 Permitting and Compensatory Mitigation. At minimum, the Applicant shall consult with the CDFW and obtain a Section 2081 Incidental Take Permit (ITP) for CTS prior to commencing construction-related activities on the project site. Compensatory mitigation shall be provided at a ratio of 2:1. Mitigation shall be purchased at a CDFW approved conservation bank prior to issuance of the ITP. Copies of the CDFW's 2081 Incidental take Permit and copies of any required USFWS's habitat conservation plan (HCP) and Incidental Take Permit shall be provided to the City of Cotati prior to the commencement of grading or other construction activities on the project site.

Mitigation Measure BIO-3. Wildlife Exclusion Fencing (WEF). Prior to the start of construction, WEF will be installed at the edge of the project footprint in all areas where CTS could enter the construction area. WEF with exit ramps, funnels, and cover boards may be required for one full rainy season to allow any CTS onsite to move into an adjacent habitat offsite and will be determined on a case- by-case basis. The location of the fencing shall be determined by the onsite project manager and the CDFW-approved biologist in cooperation with CDFW prior to the start of staging or surface disturbing activities. A conceptual fencing plan shall be submitted to the CDFW for review and approval prior to WEF installation. The WEF shall remain in place throughout the duration of the project and shall be inspected weekly and fully maintained. Repairs to the WEF shall be made within 24 hours of discovery. Upon project completion the WEF shall be completely removed, the area cleaned of debris and trash, and returned to natural conditions.

Mitigation Measure BIO-4. Relocation Plan. A Relocation Plan shall be prepared and be consistent with the Guidelines for the relocation of California tiger salamanders (Ambystoma californiense) (Shaffer et. al. 2008). The Relocation Plan shall contain the name(s) of the Service-approved biologist(s)Sandell Warehouse Project Sol Ecology, Inc. Biological Resources Report February 2021 11 to relocate CTS, method of relocation (if different than number 3 below), a map, and description of the proposed release site(s) and burrow(s), and written permission from the landowner to use their land as a relocation site.

Mitigation Measure BIO-5 Protocol for Species Observation, Handling, and Relocation. Only Service-approved biologists shall participate in activities associated with the capture, handling, relocation, and monitoring of CTS. If a CTS is encountered, work activities within 50 feet of the individual shall cease immediately and the Onsite Project Manager and Service-approved biologist shall be notified. Based on the professional judgment of the Service-approved biologist, if project activities can be conducted without harming or injuring the individual(s), it may be left at the location of discovery and monitored by the Service-approved biologist.

Mitigation Measure BIO-6. Biological Monitors. Qualified biological monitor(s) will be on site each day during all earth moving activities. The biological monitor(s) shall conduct clearance surveys at the beginning of each day and regularly throughout the workday when construction activities are occurring that may displace, injure, or kill CTS through contact with workers, vehicles, and equipment. Where feasible and only on a case-by-case basis, rodent burrows and other ground openings suspected to contain CTS that would be destroyed from project activities may be carefully excavated with hand tools. Pre-soaking the area prior to ground disturbance may also increase emergence of the species for translocation.

Before the start of work each day, the biological monitor will check for animals under all equipment such as vehicles and stored pipes. The biological monitor will check all excavated steep-walled holes or trenches greater than one foot deep for any CTS. CTS will be removed by the biological monitor and relocated according to the Relocation Plan.

To prevent inadvertent entrapment of animals during construction, all excavated, steep-walled holes or trenches

more than 6 inches deep will be covered with plywood (or similar materials) that leave no entry gaps at the close of each working day or provided with one or more escape ramps constructed of earth fill or wooden planks. The Biological Monitor shall inspect all holes and trenches at the beginning of each workday and before such holes or trenches are filled. All replacement pipes, culverts, or similar structures stored in the project footprint overnight will be inspected before they are subsequently moved, capped, and/or buried.

Mitigation Measure BIO-7. Biological Monitoring Records. The biological monitor(s) shall maintain monitoring records in accordance with applicable permits. All monitoring records shall be provided to the applicable agency(ies) within 30 days of the completion of monitoring work.

Mitigation Measure BIO-8. Proper Use of Erosion Control Measures. . Plastic or synthetic monofilament netting will not be used in order to prevent CTS from becoming entangled, trapped, or injured. This includes products that use photodegradable or biodegradable synthetic netting, which can take several months to decompose. Acceptable materials include natural fibers such as jute, coconut, twine, or other similar fibers.

Mitigation Measure BIO-9. Vegetation Removal. A Service-approved biologist will be present during all vegetation clearing and grubbing activities. Grasses and weedy vegetation should be mowed to a height no greater than 6 inches prior to ground-disturbing activities. All cleared vegetation will be removed from the project footprint to prevent attracting animals to the project site. Prior to vegetation removal, the Service-approved biologist shall thoroughly survey the area for CTS. Once the qualified biologist has thoroughly surveyed the area, clearing and grubbing may continue without further restrictions on equipment; however, the qualified biologist shall remain onsite to monitor for CTS until all clearing and grubbing activities are complete.

Mitigation Measure BIO-10. Nighttime Activities. Construction and ground disturbance will occur only during daytime hours and will cease no less than 30 minutes before sunset and will not begin again prior to no less than 30 minutes after sunrise.

Mitigation Measure BIO-11. Trash. All foods and food-related trash items will be enclosed in sealed trash containers at the end of each day and removed from the site every three days.

Mitigation Measure BIO-12. Wet Weather Restrictions. Due to funding constraints, initial grading activities are proposed during the wet weather season between October 15 and April 15. Work is anticipated to commence in the winter 2021/22. To avoid impacts to CTS that may be leaving estivation habitat and moving to nearby breeding sites, no grading shall be permitted when a ¼-inch or more precipitation is forecasted to occur. Work shall be suspended until at least 24 hours following a major rain event.

Mitigation Measure BIO-13. Burrowing Owls. A qualified biologist shall follow the California a Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012 Staff Report) habitat assessment and survey methodology prior to project activities occurring during the burrowing owl wintering season from September 1 to January 31. The habitat assessment and surveys shall encompass a sufficient buffer zone to detect owls nearby that may be impacted. Time lapses between surveys or project activities shall trigger subsequent surveys, as determined by a qualified biologist, including but not limited to a final survey within 24 hours prior to ground disturbance and before construction equipment mobilizes to the Project area. The qualified biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report survey methodology resulting in detections. Detected burrowing owls shall be avoided pursuant to the buffer zone prescribed in the CDFW 2012 Staff Report, unless otherwise approved in writing by CDFW, and any eviction plan shall be subject to CDFW review. Please be advised that CDFW does not consider eviction of burrowing owls (i.e., passive removal of an owl from its burrow or other shelter) as a "take" avoidance, minimization, or mitigation measure; therefore, offsite habitat compensation shall be included in the eviction plan. Habitat compensation acreages shall be approved by CDFW, as the amount depends on site-specific conditions, and completed before project construction. It shall also include placement of a conservation easement and preparation and implementation of a long-term management plan.

5.4(c) (Adverse Effects on State or Federally Protected Wetlands) Less Than Significant: The Army Corps of Engineers has jurisdiction over the 0.88 acres of seasonal wetland located on the project site. On April 1, 2021, the U.S. Army Corps of Engineers confirmed that the proposed project will not result in the placement of fill within waters or wetlands subject to Corps regulation on the project site, and therefore no Department of Army (DA) permit would be required.

5.4(d) (Adverse Effect to Wildlife Movement) Less Than Significant Impact: Movement corridors for wildlife through the City of Cotati include creeks, drainages, open space, as well as various low density or rural developed areas. Species using these areas include aquatic, terrestrial, and avian species.

The proposed project will not interfere with the movement of native wildlife. The project site is immediately west of an existing developed business park and south and north of developed properties developed with urban uses. The project site borders the Laguna de Santa Rosa and Washoe Creek which will remain in their current state. Development of the project site will not adversely impact any significant or regional wildlife movement corridor. Therefore, impacts due to a conflict with a movement corridor would be less than significant.

5.4(e) (Conflict with Local Ordinances) No Impact: The City of Cotati's Tree Preservation and Protection Ordinance (Chapter 17.54 of the Municipal Code) contains provisions to preserve and protect native and non-native trees. The provisions of the ordinance apply to the removal or relocation of any tree with a circumference of 12 inches or more, measured at 54 inches above natural grade. The project site is an open field with no trees, and therefore, there will be no impact.

5.4(f) (Conflicts with Habitat Conservation Plans) Less Than Significant Impact: Sonoma County does not have any California Regional Conservation Plans, as identified in the California Department of Fish and Wildlife's (CDFW) Natural Community Conservation Planning (NCCP) Map.[1] The Santa Rosa Plain Conservation Strategy Plan (SRPCSP) and the Recovery Plan were reviewed to assess the project's potential to impact any protected plant or animal species. The SRPCSP mapping (Figure 3 dated 4.16.2007) shows that the project site is in an area designated as "Future Development." The project site is not located within a "Conservation Area" of the Santa Rosa Plain according to the Recovery Plan (Figure 1 dated 5.30.2015). Accordingly, the USFWS anticipated that this project site would be developed when it prepared the Conservation Strategy.

The USFWS 2007 Programmatic Biological Opinion is based on the biological framework presented in the Conservation Strategy. Projects that require a Corps permit, that remain consistent with objectives stated in the Conservation Strategy, can be appended to the Programmatic Biological Opinion at the discretion of the USFWS. Projects that are appended to the Programmatic Biological Opinion will be provided individual take authorization for impacts to federally-listed species.

As described in 5.4 (a-b) above, development of the proposed project will result in impacts to California tiger salamander habitat. Mitigation Measure BIO-2 requires the applicant to purchase conservation credits for CTS special-status species at replacement to impacts ratios identified in the USFWS' 2007 Programmatic Biological Opinion (or any successor Programmatic Biological Opinion). Therefore, the project does not conflict with any local policies or adopted conservation plans, and impacts resulting from a conflict with an adopted conservation plan from project implementation would be considered less than significant.

5.5. CULTURAL RESOURCES

Would the project:	Potentially Significant	Less Than Significan	Less Than Significan	No Impact

[1] California Regional Conservation Plans, prepared by California Department of Fish and Wildlife, October 2017, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, Accessed October 12, 2018.

	Impact	t with Mitigation	t Impact	
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; and Cultural Resources Study, prepared by Scott McGaughey, Anthropological Studies Center, Sonoma State University, June, 2021.

Cultural Resources Setting:

As shown on General Plan EIR Figure 3.4-1: Sensitive Archaeological Areas, the project site is in an area considered sensitive for prehistoric archaeological deposits. The project site is not located within the Historic Corridor. As shown in Figure 3.8-1: Watersheds of the General Plan EIR, the project site is located adjacent to the Laguna de Santa Rosa and Washoe Creek.

Cultural Resources Study

Scott McGaughey at the Anthropological Studies Center at Sonoma State University conducted a Cultural Resources Study for the proposed project (**Appendix D**).

A historical resource under CEQA (also called a cultural resource [14 CCR Appendix A]) is "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 . . . 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 [CRHR]" (CCR §15064.5[a][3]). The eligibility criteria for listing cultural resources, both archaeological and historical, in the CRHR are defined in CRHR publications (California Office of Historic Preservation 1998) and in the CEQA guidelines (CCR §15064.5).

Any resource that is eligible for listing in the California Register must be given consideration under the CEQA process (PRC §21084.1; CCR §15064.5; CCR §15021); adverse effects to cultural resources eligible for listing on the CRHR must be avoided or the effect must be mitigated where feasible (CCR §15021).

The archaeological resources study comprised four main parts: a records and literature search at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS), administered by the California Office of Historic Preservation (OHP); a further literature review of publications, files, and maps at ASC and online for ethnographic, historic-era, and prehistoric resources and background information; communication with the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File and contact information for the appropriate Tribal communities, who ASC then contacted regarding the project; and a pedestrian archaeological survey of the parcel. Based on the results of this study, this report concludes with an assessment of the potential for surficial and buried archaeological resources in the project area.

ASC Archaeological Technician Sydni Kitchel conducted the records and literature search at the NWIC on 9 June 2021, supplemented by further literature review at ASC and online. ASC Staff Archaeologist Scott McGaughey handled the NAHC contacts and carried out the pedestrian archaeological field survey of the parcel on 11 June 2021.

The records search found no previously recorded cultural resources on the parcel, and that a small portion of the parcel had been previously studied. No previously recorded cultural resources were identified within 0.25-miles of the parcel. The parcel's sensitivity for buried archaeological resources is moderate. The parcel's sensitivity for unrecognized surficial archaeological resources is also moderate. The pedestrian archaeological survey identified no archaeological resources on the property.

RESULTS OF PEDESTRIAN SURVEY: The pedestrian archaeological survey found no archaeological resources. Because of the poor visibility, however, the existence of buried or hidden cultural resources cannot be entirely ruled out.

CONCLUSIONS: The records search and literature review identified no previously recorded cultural resources in the Project Area or Study Area, and that a portion of the Project Area had been previously studied. Background research indicates a moderate sensitivity for small prehistoric archaeological resources on the surface and a moderate sensitivity for historicera archaeological resources on the surface within the Project Area. The area's sensitivity for buried prehistoric archaeological resources is also moderate. No information has been received from the NAHC or the people on the list of contacts provided by the NAHC that suggests the presence of cultural resources in the Project Area. The pedestrian archaeological survey located no archaeological resources in the Project Area

METHODS: Prior to the pedestrian archaeological survey, the author conducted a records search and literature review on 9 June 2021 at the NWIC. The NWIC, at Sonoma State University in Rohnert Park, California, is administered by the State of California Office of Historic Preservation (OHP) as one of the centers that maintain the California Historical Resources Information System (CHRIS), the official state repository for records and reports on historical resources, including archaeological resources. The NWIC's records cover an 18- county area that includes Sonoma County. Additional research was conducted using maps, files, reports, and publications at ASC and online.

The records search and literature review examined the following documents: • NWIC maps (USGS 7.5-minute topographic maps with NWIC annotations), to identify recorded archaeological sites, recorded archaeological surveys, and recorded historicera resources of the built environment (buildings, structures, and objects) within the Study Area. • Site records and study reports on file at the NWIC corresponding to those marked on the NWIC maps within the Study Area. • The California Department of Parks and Recreation's (1976) California Inventory of Historic Resources and the OHP's (2019) Built Environment Resource Directory (BERD, December 2019), to identify California Historical Landmarks, California Points of Historic Interest, and California historic properties that are listed in, or determined eligible for listing in, the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) located within the Study Area. • Historic-era maps (diseños, General Land Office maps, and 19th- and early-20th-century USGS 15- and 7.5-minute topographic maps), to identify additional historic-era buildings, structures, objects, and areas of archaeological sensitivity located in or near the Study Area. • Handbook of North American Indians, Volume 8: California (Heizer 1978) to identify ethnographic village locations in or near the Study Area. Online resources including historical map collections, the United States Department of Agriculture (USDA) Web Soil Survey website, United States Geological Survey online map and geological information, websites of local historical museums and societies, Tribal websites, and subject-specific search results.

Cultural Resources Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.5(a-c) (Historic Resources, Archaeological Resources, Human Remains) Less Than Significant Impact: As shown on General Plan EIR Figure 3.4-1: Sensitive Archaeological Areas, all parcels within the CI Zoning District are considered sensitive for prehistoric archaeological deposits. None of the parcels are located within the Historic Corridor. The proposed zoning text amendment to allow SW within the CI zoning district would not result any new or different impacts to cultural resources beyond those previously identified by the City's General Plan EIR. All future development proposals within the CI zoning district, including SW facilities, would be subject to General Plan policies including those that afford protection to historic resources, archaeological resources, and human remains. If warranted, a Cultural Resources Study would be required for future development applications through the Use Permit process to identify site-specific historic and archaeological resources. The proposed zoning text amendment would allow for SW in areas of the city where similar types of development are currently allowed. Therefore, impacts related to cultural resources from the proposed zoning text amendment to allow SW within the CI zoning district would be less than significant.

Warehouse Building and Facilities

5.5(a) (Historic Resources) No Impact: As described above, the project site is not located within the Historic Corridor as identified on Figure 3.4-1 of the General Plan EIR. In addition, the site is completely vacant and undeveloped. Therefore, no impacts to historic resources would occur from the proposed project.

5.5(b) (Archaeological Resources) Less Than Significant with Mitigation: As described above, during the site survey, no archaeological resources were found on the surface of the project site. However, as described in the General Plan EIR, and as shown on Figure 3.4-1, the project site is in an area considered sensitive for prehistoric archaeological deposits. As such, undiscovered cultural resources within the project site could be encountered during construction activities. **Mitigation Measure CUL-1** provides that a preconstruction cultural resources awareness training be conducted. **Mitigation Measure CUL-2** provides that in the event that archeological resources are encountered during grading or excavation, all ground disturbing activity shall be halted immediately until a qualified archaeologist can evaluate the potential resource and recommend further action. Implementation of measures CUL-1 and CUL-2 will ensure that in the event of accidental discovery the potential for the project to adversely impact or result in a change to the significance of archeological resources would be reduced to less-than-significant levels.

5.5(c) (Discovery of Human Remains) Less Than Significant with Mitigation: No evidence suggests that human remains have been interred within the boundaries of the project site. However, in the event that during ground disturbing activities human remains are discovered to be present, the applicant would be subject to **Mitigation Measure CUL-3**, which mandates the immediate cessation of ground disturbing activities near or in any area potentially overlying adjacent human remains and contacting the Sonoma County Coroner. If it is determined by the Coroner that the discovered remains are of Native American descent, the Native American Heritage Commission shall be contacted immediately. If appropriate, the property owner shall retain a City-qualified archeologist to provide adequate inspection, recommendations and retrieval. Compliance with CA HSC Section 7050.5, as required under state law, and performance of actions therein, will ensure that in the event of accidental discovery of human remains, impacts will be reduced to levels below significance.

Mitigation Measures:

CUL-1: A preconstruction cultural resource awareness training shall be held prior to commencement of ground-disturbing activities in order to familiarize the team with the potential to encounter prehistoric artifacts or historic-era archaeological deposits, the types of archaeological material that could be encountered within the project area, and procedures to follow in the event that archaeological deposits and/or artifacts are observed during construction. Historic-era resources potentially include all by-products of human land use greater than 50 years of age, including alignments of stone or brick, foundation elements from previous structures, minor earthworks, brick features, surface scatters of farming or domestic type material, and subsurface deposits of domestic type material (glass, ceramic, etc.). Artifacts that are typically found

associated with prehistoric sites in the area include humanly modified stone, shell, bone or other materials such as charcoal, ash and burned rock that can be indicative of food procurement or processing activities. Prehistoric domestic features include hearths, fire pits, house floor depressions and mortuary features consisting of human skeletal remains.

CUL-2 If during the course of ground disturbing activities, including, but not limited to excavation, grading and construction, a potentially significant prehistoric or historic resource is encountered, all work within a 100 foot radius of the find (or as otherwise directed by a qualified archeologist) shall be suspended for a time deemed sufficient for a qualified and city-approved archeologist to adequately evaluate and determine significance of the discovered resource, confer with tribal representative, as appropriate, and provide treatment recommendations. Should a significant cultural resource be identified, a qualified archaeologist shall prepare a resource mitigation plan and monitoring program to be carried out during all construction activities.

CUL-3 In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 shall be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance within 100 feet of the remains until the Sonoma County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the most likely descendant of the deceased Native American. The most likely descendant may make recommendations for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

2. Where the following conditions occur, the landowner or authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project site in a location not subject to further subsurface disturbance:

    - The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being given access to the site.
    - The descendant identified fails to make a recommendation.
    - The landowner or authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

5.6. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of	☐	☐	☒	☐

energy, or wasteful use of energy resources, during project construction or operation?				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; BAAQMD 2017 Bay Area Clean Air Plan; Sonoma County Regional Climate Action Plan 2020 and Beyond, prepared July 2016; and California Energy Commission various publications.

Energy Setting:

Energy resources include electricity, natural gas and other fuels. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. Energy production and energy use both result in the depletion of nonrenewable resources (e.g., oil, natural gas, coal, etc.) and emission of pollutants. Energy consumption is measured using the British Thermal Unit (BTU). BTU is the amount of energy that is required to raise the temperature of one pound of water by one-degree Fahrenheit. As points of reference, the approximate amount of energy contained in a gallon of gasoline, 100 cubic feet (one therm) of natural gas, and a kilowatt hour of electricity are 123,000 BTUs, 100,000 BTUs, and 3,400 BTUs, respectively.

Electricity

The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts while energy use is measured in watt-hours. For example, if a light bulb has a capacity rating of 100 watts, the energy required to keep the bulb on for 1 hour would be 100 watt-hours. If ten 100-watt bulbs were on for 1 hour, the energy required would be 1,000 watt-hours or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts, which is one million watts, while energy usage is measured in megawatt-hours or gigawatt-hours (GWh), which is one billion watt-hours.

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network. Natural gas is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet.

California Energy Consumption

According to the California Energy Commission (CEC), total system electric generation for California in 2017 was 292,039 gigawatt-hours (GWh).[2] California's non-CO_2 emitting electric generation categories (nuclear, large hydroelectric, and renewable generation) accounted for more than 56 percent of total in-state generation for 2017. California's in-state electric generation was 206,336 GWh and electricity imports were 85,703 GWh.

According to the CEC, nearly 45 percent of the natural gas burned in California was used for electricity generation, with the remainder consumed in the residential (21 percent), industrial (25 percent), and commercial (9 percent) sectors. In 2012, total natural gas demand in California for industrial, residential, commercial, and electric power generation was 2,313 billion cubic feet.[3]

According to the CEC, gasoline has remained the dominant fuel within the transportation sector, with diesel fuel and aviation fuels following. In 2016, California consumed approximately 15 billion gallons of gasoline and approximately 3.35 billion gallons of diesel fuel. An increasing amount of electricity is being used for transportation energy, which is chiefly attributed to the acceleration of light-duty plug-in electric vehicles. In 2016, transportation in California, consisting of light-duty vehicles, medium/heavy-duty vehicles, trolleys, and rail transit, consumed approximately 1.53 million megawatt hours (MWh).[4]

Sonoma County Climate Action Plan 2020

In 2005, the ten local governments within Sonoma County pledged to reduce GHG emissions community-wide to 25 percent below 1990 levels by 2015 (Cotati adopted 30% by 2015, Resolution 05-66). The Regional Climate Protection Authority (RCPA) was created in 2009 to help each jurisdiction reach its goal. Climate Action 2020 is a collaborative effort led by the RCPA and includes nine cities, the County of Sonoma, and several partner entities to take further actions to reduce GHG emissions community-wide and respond to the threats of climate change.

As presented in the Climate Action Plan 2020, Section 5.2: Cotati, the City of Cotati is focused on infill development and "green" priorities for new building. Energy efficiency is at the core of the City of Cotati's General Plan policies and regulations, see following discussion below. In addition, Cotati requires that all projects comply with the CalGreen Building Code, which is set forth in Municipal Code Chapter 14.04.130 and establishes Tier 1 as mandatory for new residential and non-residential structures.

Cotati General Plan

The proposed project is subject to the goals, objectives, policies, and actions outlined in the Cotati General Plan aimed at reducing energy consumption. The following from the General Plan are particularly applicable to the subject project:

Policy CON 2.10: Encourage local businesses and industries to engage in voluntary efforts to reduce GHG emissions and energy consumption.

Objective CON 3A: Achieve a high level of energy efficiency in new buildings and in significant remodels.

[2] California Energy Commission, Total System Electric Generation (2017)
http://www.energy.ca.gov/almanac/electricity_data/total_system_power.html, Accessed October 17, 2018.

[3] California Energy Commission, Supply and Demand of Natural Gas in California
http://www.energy.ca.gov/almanac/naturalgas_data/overview.html, Accessed October 17, 2018.

[4] California Energy Commission, 2017 Integrated Energy Policy Report, Publication Number: CEC-100-2017-001-CMF.

Policy CON 3.1: Continue to require all new public and privately constructed buildings to meet and comply with CalGreen Tier 1 standards.

Policy CON 3.2: Support innovative and green building best management practices, including LEED certification, for all new development, and encourage project applicants to exceed CalGreen Tier 1 standards, if feasible.

Policy CON 3.3: Promote the use of alternative energy in new development.

Policy CON 3.4: Incorporate innovative green building techniques and best management practices in the site design, construction, and renovation of all public projects.

Policy CON 3.7: Encourage tree planting, including widespread use of trees as windbreaks to maximize the effects of cooling westerly winds and planting of deciduous trees to help reduce summer temperatures, either in conjunction with new development or through private sector participation.

Policy LU 1.5: Sustainable best management practices (BMP) in green building, stormwater management, and conservation to mitigate infrastructure impacts, while minimizing effects on water, sewer, and energy.

Cotati Municipal Code

The proposed project is subject to the relevant sections of the Municipal Code related to energy conservation, including Chapter 17.51 (Resource Conservation) and Section 14.04.090 (California Energy Code). In particular, the proposed project will be subject to Section 17.51.030 (Citywide energy conservation standard), which requires that the new structures be designed and constructed to achieve a minimum of fifteen percent greater energy efficiency than otherwise required by the California Code of Regulations, Title 24, and to implement the city's sustainable building program adopted by council resolution.

Cotati Energy Consumption

Energy consumption in Cotati is from fuels used for transportation, building energy, wastewater treatment, and water conveyance. In 2010 the average household in the City of Cotati consumed 6,051 kWh of electricity, 395 Therms of Natural Gas, and 60,624 gallons of water.

Energy Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.6(a-b) (Wasteful, Inefficient, Unnecessary Consumption of Energy, Conflict with State or Local Plan) Less Than Significant Impact: The proposed zoning text amendment to allow SW within the CI zoning district would not result any new or different impacts to energy consumption beyond those previously identified by the City's General Plan EIR. All future development proposals within the CI zoning district, including SW facilities, would be subject to General Plan policies including those that require energy conservation and efficiency. All future development within the CI zoning district, including new SW facilities if proposed in the future, would be subject to local policies related to energy conservation including the City of Cotati General Plan and Cotati Municipal Code, such as Section 17.51.030 of the Municipal Code. As such, allowing SW within the CI Zoning District would not result in the wasteful, inefficient, and unnecessary consumption of electricity and natural gas. Therefore, energy impacts from the proposed zoning text amendment to allow SW within the CI zoning district would be less than significant.

Warehouse Building and Facilities

5.6(a) (Wasteful, Inefficient, Unnecessary Consumption of Energy) Less Than Significant Impact: Development of the proposed project would involve the use of energy during construction and at operation. Site preparation, grading, paving, and building construction would consume energy in the form of gasoline and diesel

fuel through the operation of heavy off-road equipment, trucks, and worker trips. Consumption of such resources would be temporary and would cease upon the completion of construction. Due to the limited scale of the proposed project and the provision to limit idling set forth above in **Mitigation Measure AQ-1** (see Section 5.3 Air Quality) construction activities would not result in inefficient energy consumption during construction. As such, construction-related energy impacts would be less than significant.

Long-term operational energy use associated with the project includes electricity and natural gas consumption associated with the new buildings (e.g., lighting, electronics, heating, air conditioning, refrigeration), energy consumption related to water usage and solid waste disposal, and fuel consumption (gasoline and diesel) by vehicles associated with the project through the generation of new vehicle trips.

The project is subject to local policies related to energy conservation including the City of Cotati General Plan and Cotati Municipal Code. For example, the project would be required to comply with Section 17.51.030 of the Municipal Code, which requires that the new structures be designed and constructed to achieve a minimum of fifteen percent greater energy efficiency than otherwise required by the California Code of Regulations, Title 24, and to implement the city's sustainable building program adopted by council resolution. The proposed project will also conform to Policy CON 3.7, which encourages tree planting to maximize the effects of cooling westerly winds and help reduce summer temperatures. Additionally, the project is subject to **Mitigation Measure GHG-1** (Section 5.8 Greenhouse Gas Emissions), which requires implementation of local measures set forth in the Region's Climate Action Plan, Climate Action 2020 and Beyond. As such, the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of electricity and natural gas during project operation. Therefore, operational-related energy impacts related to electricity and natural gas would be less than significant.

Energy would be consumed through daily activities at operation of the project including the delivery of water for potable and irrigation purposes, heating, cooling, and ventilation systems, solid waste management, and vehicle use. While the long-term operation of the project would result in an increase in energy consumption compared to existing conditions, the project will incorporate design measures (related to electricity, natural gas and water use) in compliance with Title 24, the Cotati General, and the Cotati Municipal Code to minimize energy consumption. Therefore, operation of the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy and impacts would be less than significant.

5.6(b) (Conflict with State or Local Plan) Less Than Significant Impact: As previously described, the proposed project would have a less than significant impact due to a conflict with the 2017 CAP related to energy since, a) the project supports the goals of the CAP in that it limits urban sprawl by proposing development within existing urban limits on an underutilized site; b) includes control measures to reduce construction-related energy consumption by implementing BMPs set forth by BAAQMD; and c) as a storage-warehouse facility subject to the latest building code, the proposed project would not interfere with implementation of the energy control measures identified in the 2017 CAP. Therefore, the project will have less than significant impacts due to a conflict with the BAAQMD 2017 CAP.

In December 2007, the CEC prepared the State Alternative Fuels Plan in partnership with the CARB and in consultation with the other state, federal, and local agencies. The plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce greenhouse gas emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality. As a storage-warehouse facility that would install energy

conservation features, the proposed project would not conflict with or obstruct implementation of the State Alternative Fuels Plan and impacts would be less than significant.[5]

The City of Cotati requires that all new development demonstrate compliance with CalGreen Tier 1 Building standards. CalGreen Tier 1 reduces energy consumption for heating, air conditioning, and ventilation and requires use of low-water irrigation systems, water efficient appliances and faucets, cool roofs, short- and long-term bicycle parking, electric vehicle charging spaces, outdoor energy performance lighting and other mandatory energy efficiency measures. Prior to issuance of a building permit, the proposed structures onsite will be required to demonstrate compliance with CalGreen Tier 1 standards. Therefore, new structure onsite will not conflict with state or local energy efficiency plans and impacts will be less than significant.

Mitigation Measures: None Required.

5.7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Publication 42.	☐	☐	☐	☒
ii. Strong Seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐

[5] California Energy Commission, Final Adopted State Alternative Fuels Plan, Adopted December 2007, http://www.energy.ca.gov/ab1007/, Accessed October 17, 2018.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; and Soil and Geotechnical Feasibility Evaluation, prepared by Reese and Associates, March 26, 2021.

Geology and Soils Setting:

The City of Cotati is located within the San Andreas Fault system, which is 44 miles wide and extends throughout much of the North Bay Area. The nearest active faults to the project site are: Rodgers Creek (4.25 miles east), Healdsburg (13 miles north), Maacama (16 miles north), and San Andreas (16 miles west). No active faults directly traverse the City; however, potential exists for geologic hazards citywide associated with ground shaking, including: liquefaction, ground failure, and seismically-induced landslides.

Reese and Associates conducted a Soil Investigation and Geotechnical Feasibility Evaluation for the project site (**Appendix E**). The Evaluation included a review of readily-available reference documents, a site reconnaissance performed on January 20, 2021 and March 6, 2021 to observe existing conditions, an assessment of geologic and geotechnical hazards, a description of the geologic/geotechnical factors affecting the feasibility of the proposed development, and preliminary design criteria.

Regional geologic mapping by the California Geological Survey indicate the project site is underlain by Pleistocene alluvial fan deposits consisting of undivided silt, clay, sand and gravel. Subsurface conditions at the site consist of recent alluvial deposits, mainly clays and sands. In general, the adobe clays are underlain by stiff to hard sandy clays of moderate to expansion potential and medium dense to very dense clayey and silty sands of low expansion potential.

A paleontological resources search performed using the University of California Museum of Paleontology's (UCMP) Miocene Mammal Mapping Project (MioMap) indicated no previous finds of paleontological resources on or in the immediate vicinity of the project site.[6] According to the MioMap database, the closest paleontological find is located approximately 8.75 miles southeast of the project site.

Geology and Soils Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.7(a-f) (Faults, Strong Seismic Groundshaking, Landslides, Erosion, Paleontological Resources) Less Than Significant Impact: All parcels within the CI Zoning District are in a seismically active area. As All future buildings proposed within the CI zoning district including future SW buildings are required to be built in

[6] University of California Museum of Paleontology, Miocene Mammal Mapping Project (MioMap), http://www.ucmp.berkeley.edu/miomap/, Accessed February 11, 2019.

conformance with the standards set forth in the most recent California Building Code of Regulations, Title 24, Part 2 (the California Building Code 3.7-20 Chapter 3: Setting, Impacts, and Mitigation Measures [CBC]) and the California Public Resources Code, Division 2, Chapter 7.8 (the Seismic Hazards Mapping Act) to ensure that potential impacts from seismic shaking are less than significant. If warranted, and consistent with General Plan policies SA 2.3 (Require Geotechnical Investigations) and 2.4 (Review by Soils Engineer), a Geotechnical Evaluation would be required through the Use Permit process to identify site-specific geologic conditions and design criteria to mitigate geotechnical hazards. The proposed zoning text amendment to allow SW within the CI zoning district is consistent with the General Plan and does not introduce any new or more severe impacts relative to what is currently allowed within the CI zoning district. Therefore, impacts related to geology and soils would be less than significant.

Warehouse Building and Facilities

5.7(a.i) (Faults) No Impact: Fault rupture occurs when the ground surface fractures as a result of fault movement during an earthquake and almost always follows preexisting fault traces, which are zones of weakness. Given that the project site is not part of the Alquist-Priolo Earthquake Fault Zone and no identified active faults traverse the site, there is no expectation that the site would be vulnerable to fault rupture. The nearest faults with surface rupture include the Rodgers Creek Fault and the San Andreas Fault. The Alquist-Priolo Zone of the Rodgers Creek Fault is located approximately 4.8 miles east of the project site). The Alquist-Priolo Zone of the San Andreas Fault is located approximately 16 miles west of the project site. As such, there is no risk of fault-related ground rupture during earthquakes within the limits of the site due to a known Alquist-Priolo Earthquake Fault Zone. Therefore, there are no impacts expected due to fault rupture at the project site.

5.7(a. ii) (Ground-Shaking) Less Than Significant Impact: The proximity of the City of Cotati and the project site to the active Rodgers Creek Fault places it within Zone 8 (Very Strong) of the Modified Mercalli Intensity Shaking Severity Level. As such, the project site holds potential to expose people and structures to substantial adverse effects resulting from strong seismic ground shaking. The resulting vibrations would likely cause primary damage to the proposed buildings and improvements with secondary effects being ground failures in loose alluvium or poorly compacted fill. Both the primary and secondary effects pose a potential risk of loss of life or property.

Conformance with standards set forth in the Building Code of Regulations and the California Public Resources Code will ensure that potential impacts from seismic shaking are less than significant. Adherence to Class D specifications for ground motion parameters, in particular, will ensure that the proposed buildings and associated improvements onsite would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death as a result of seismic activity. Therefore, potential impacts from ground shaking will have a less than significant impact.

5.7(a. iii) (Seismic-related ground failure/liquefaction) Less Than Significant With Mitigation: Liquefaction is a phenomenon associated with fine-grained, loosely-packed sands and gravels subjected to ground shaking as a result of seismic activity. Liquefaction can lead to total and/or differential settlement and is largely dependent upon the intensity of ground shaking and response of soils underlying the site. As shown on Figure 3.5-2 of the General Plan EIR and the Susceptibility Map of the San Francisco Bay Area, the project site is mapped as having a moderate susceptibility to liquefaction.

According to the Geotechnical Feasibility Evaluation, the sandy soils encountered in the test borings are sufficiently dense, contain a sufficient amount of clayey fines, or overlain by a sufficiently thick surface layer of non-liquefiable soils such that the risk of building distress due to liquefaction and /or densification would be considered low.

As such, the proposed project is required to implement **Mitigation Measure GEO-1**, which requires that all recommendations outlined in the Geotechnical Feasibility Evaluation be incorporated. Further, **Mitigation Measure GEO-2** would be implemented, which would require the preparation of a site-specific geotechnical

investigation report prior to the issuance of grading permits to confirm the absence of soils susceptible to liquefaction. GEO-2 also requires that all recommendations of the site-specific geotechnical investigation report be incorporated. With implementation of GEO-1 and GEO-2, hazards related to ground failure and/or liquefaction will be less than significant.

5.7(a. iv) (Landslide) No Impact: The risk of landslide is dictated by several factors including precipitation conditions, soil types, steepness of slope, vegetation, seismic conditions and level of human disturbance. When certain conditions are present, landslides can be triggered as a result of seismic activity. Landslides have been known to occur within Sonoma County, but are typically confined to slopes steeper than 15% and occur in areas underlain by geologic units that have demonstrated stability problems. Based on the site's relatively flat topography, and as shown on Figure 3.5-6 of the General Plan EIR, the project site is located in an area with a very low landslide potential. Therefore, the project will have no impacts due to loss of structures or life from landslides.

5.7(b) (Erosion) Less Than Significant Impact: Development of the project will require site preparation and grading activities that will potentially result in soil erosion or the loss of topsoil if not properly controlled. Water and wind serve as the primary catalyst of soil erosion, with steeper slopes intensifying the effects. Vegetation removal as part of the site preparation process as well as grading and ground disturbing activities associated with development can heighten the potential for and accelerate soil erosion.

Project activities are not expected to generate a substantial loss in topsoil but will involve the removal of vegetation such as of grass and similar vegetation. Accordingly, construction activities do hold the potential to result in soil erosion if not properly performed.

In order to ensure that potential impacts related to soil erosion are reduced to levels below significance during site preparation and project operation, the applicant shall comply with erosion and sediment control standards as stipulated in Chapter 14.36 of the Cotati Municipal Code which requires, amongst other things, an erosion control plan prepared by a Civil Engineer or other qualified professional that outlines appropriate measures to minimize soil erosion, and sedimentation and that complies with design and construction standards contained in the City's Municipal Code. The applicant is also required to comply with the RWQCB NPDES permit requirements which will further reduce potential for erosion (see **Mitigation Measure HYDRO-1**).

Adherence to uniformly applied development standards, including the preparation of an Erosion and Sediment Control Plan, as well implementation of HYDRO-1, will ensure that any potential impacts due to erosion and sedimentation will be reduced to less than significant levels. Therefore, the project will generate a less than significant impact related to soil erosion or loss of topsoil.

5.7(c,d) (Unstable Geologic Unit, Expansive Soils) Less than Significant with Mitigation: Lateral spreading, lurching and associated ground failure can occur during strong ground shaking on certain soil substrate typically on slopes. Lurching generally occurs along the tops of slopes where stiff soils are underlain by soft deposits or along steep channel banks whereas lateral spreading generally occurs where liquefiable deposits flow towards a "free face," such as channel banks, during an earthquake.

Given the relatively level slopes throughout the City of Cotati, the potential for lateral spreading is very low. The potential for lateral spreading increases in the foothills and mountains to the east and west of the City. Based on the site's relatively flat topography, the project site has a very low potential for lateral spreading.

During the site reconnaissance, Reese and Associates determined that the presence of weak, compressible upper soils and near-surface highly expansive clays. The report concluded that the weak, compressible upper soils should be removed and replaced with properly compacted fill. The report concluded that from a soil engineering standpoint, the site can be used for the proposed construction.

The proposed project is required to implement **Mitigation Measure GEO-1**, which requires preparation of a site-specific geotechnical investigation report prior to the issuance of grading permits and implementation of

design level recommendations. With implementation of GEO-1, the project would have less than significant impacts due to the presence of expansive soils or a geologic unit or soil that is unstable, or that would become unstable as a result of the project.

5.7(e) (Septic Tanks) No Impact: There are no onsite septic tanks or alternative wastewater treatment facilities proposed as part of the Project. Therefore, there would be no impacts due to the disposal of wastewater where sewers are not available.

5.7(f) (Paleontological Resources) Less Than Significant with Mitigation: The City of Cotati General Plan does not identify the presence of any paleontological or unique geological resources within the boundaries of the City limits. As described above, the closest paleontological find is located approximately 8.75 miles southeast of the project site. Therefore, limited expectation exists for paleontological resources to be present on the project site. Nevertheless, the potential remains for the discovery of buried paleontological resources. Because the potential for inadvertent discovery of paleontological or unique geological resources exists, **Mitigation Measure GEO-2**, as set forth below, shall be implemented. GEO-2 will ensure that proper procedures are followed in the event of a paleontological discovery; thereby reducing potential impacts to levels below significance.

Mitigation Measures:

GEO-1: Prior to issuance of a grading permit, a site-specific geotechnical investigation with subsurface exploration and laboratory testing shall be conducted to provide design-level recommendations and criteria for the project (pursuant to the recommendations of the Geotechnical Feasibility Evaluation prepared by Reese and Associates on March 26, 2021). The geotechnical investigation report shall be prepared and submitted to the City Engineer for review. The site-specific geotechnical investigation shall include, but not be limited to, the following: conduct subsurface exploration to confirm the absence of loose, saturated granular layers; and evaluate and provide recommendations for expansive soil mitigation measures. All recommendations of the site-specific geotechnical investigation report shall be incorporated into the project design, construction documents and improvement plans, or as otherwise determined by the City Engineer and/or Chief Building Official. The project's geotechnical engineer shall inspect the construction work and shall certify to the City, prior to issuance of a certificate of occupancy, that the improvements have been constructed in accordance with the geotechnical investigation report.

GEO-2: In the event that paleontological resources, including individual fossils or assemblages of fossils, are encountered during construction activities all ground disturbing activities shall halt and a qualified paleontologist shall be procured to evaluate the discovery and make treatment recommendations.

5.8. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; BAAQMD 2017 Bay Area Clean Air Plan; BAAQMD CEQA Guidelines 2019; Sonoma County Regional Climate Action Plan 2020 and Beyond, prepared July 2016; and Evaluation of Air Quality and

Greenhouse Gas Emissions, prepared by Illingworth & Rodkin, June 21, 2021.

Greenhouse Gas Emissions Setting:

Global temperatures are affected by naturally occurring and anthropogenic-generated (generated by humankind) atmospheric gases, such as water vapor, carbon dioxide, methane, and nitrous oxide. Gases that trap heat in the atmosphere are called GHGs. Solar radiation enters the earth's atmosphere from space, and a portion of the radiation is absorbed at the surface. The earth emits this radiation back toward space as infrared radiation. GHGs, which are mostly transparent to incoming solar radiation, are effective in absorbing infrared radiation and redirecting some of this back to the earth's surface. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This is known as the greenhouse effect. The greenhouse effect helps maintain a habitable climate. Emissions of GHGs from human activities, such as electricity production, motor_vehicle use, and agriculture, are elevating the concentration of GHGs in the atmosphere, and are reported to have led to a trend_of unnatural warming of the earth's natural climate, known as global warming or global climate change. The term "global climate change" is often used interchangeably with the term "global warming," but "global climate change" is preferred because it implies that there are other consequences to the global climate in addition to rising temperatures. Other than water vapor, the primary GHGs contributing to global climate change include the following gases:

• Carbon dioxide (CO_2), primarily a byproduct of fuel combustion; • Nitrous oxide (N_2O), a byproduct of fuel combustion; also associated with agricultural operations such as the fertilization of crops; • Methane (CH_4), commonly created by off-gassing from agricultural practices (e.g. livestock), wastewater treatment and landfill operations; • Chlorofluorocarbons (CFCs) were used as refrigerants, propellants and cleaning solvents, but their production has been mostly prohibited by international treaty; • Hydrofluorocarbons (HFCs) are now widely used as a substitute for chlorofluorocarbons in refrigeration and cooling; and • Perfluorocarbons (PFCs) and sulfur hexafluoride (SF_6) emissions are commonly created by industries such as aluminum production and semiconductor manufacturing.

These gases vary considerably in terms of Global Warming Potential (GWP), a term developed to compare the propensity of each GHG to trap heat in the atmosphere relative to another GHG. GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and the length of time of gas remains in the atmosphere. The GWP of each GHG is measured relative to CO_2. Accordingly, GHG emissions are typically measured and reported in terms of CO_2 equivalent (CO_2e). For instance, SF_6 is 22,800 times more intense in terms of global climate change contribution than CO_2.

The State of California is addressing the issue of GHG through legislation, policy guidance, and outreach programs. CO_2 is the primary GHG emitted from land use and industrial projects. In 2006 California enacted AB 32 – the Global Warming Solutions Act, which requires that statewide GHG emissions be reduced to 1990 levels by 2020. In 2008, the California Air Resources Board (CARB) adopted the Climate Change Scoping Plan in response to AB 32. This plan describes the strategies that the State will implement to reduce future emissions by 28% to meet the 1990 target goal in 2020. BAAQMD's California Environmental Quality Act (CEQA) Air Quality Guidelines are used to assess GHG emissions from land use projects. BAAQMD's analysis of future land use development in the Bay Area and applicable AB 32 GHG reduction strategies lead to the development of emission-based significance thresholds for the projects in the Bay Area, which include Sonoma County.

Cotati Greenhouse Gas Reduction Plan:

The City of Cotati developed a Greenhouse Gas Emissions Reduction Action Plan Analysis as a way to reduce City GHG emissions. These apply to City actions and not those of private developments. In 2018, the City adopted section 5.2 of the Sonoma County Regional Climate Action Plan. This section includes those relatively short-term measures that apply specifically to Cotati.

Greenhouse Gas Emissions Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.8(a-b) (Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?), ***Less Than Significant Impact*****:** The proposed zoning text amendment to allow SW within the CI zoning district would not result in any new or different impacts to GHG emissions beyond those previously identified by the City's General Plan EIR. All future development proposals within the CI zoning district, including SW facilities, would be subject to General Plan policies including those that promote GHG reductions. All future development within the CI zoning district, including new SW facilities, would be subject to local policies such as implementation of BAAQMD-recommended best management practices to control for fugitive dust, which also reduce GHG emissions. In addition, future developed within the CI zoning district including new SW buildings would be subject to policies and regulations related to GHG emissions set forth in the City of Cotati's General Plan and BAAQMD's CEQA Air Quality Guidelines. As such, allowing SW facilities as conditionally permitted uses within the CI Zoning District would not result in significant GHG emissions nor would it conflict with the GHG Reduction Plan. Therefore, impacts related to GHG emissions would be less than significant.

Warehouse Building and Facilities

BAAQMD has identified project screening sizes for assessing whether a project might result in potentially significant greenhouse gas emissions. Due to the project size, construction exhaust and operational period emissions would be less-than-significant. In their 2017 update to the CEQA Air Quality Guidelines, BAAQMD identified the size of land use projects that could result in significant air pollutant emissions. For greenhouse gas emission impacts, the Warehouse facility project screening size was identified at 64,000 square feet. While the project size could fluctuate during the planning stage, we would expect less-than-significant impacts for several reasons: (1) the screening sizes are based on older modeling with higher emissions rates and (2) this type of facility tends to result in relatively low trips rates and traffic from land use projects tends to be the primary source of GHG emissions.

The CalEEMod modeling for the proposed project, included in Attachment 2, shows total direct and indirect GHG emissions from the project at 325 metric tons during operation in 2023. This is well below the bright-line threshold of 1,100 metric tons annually recommended by BAAQMD in the CEQA Air Quality Guidelines.

5.8(b) (Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?) ***Less Than Significant Impact***

The project would be subject to City requirements and policies and new requirements under rule making developed at the State and local level regarding greenhouse gas emissions and are subject to local policies that may affect emissions of greenhouse gases. This type of project is not anticipated to conflict with any strategy to reduce greenhouse gas emissions.

5.9. HAZARDS / HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would 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 of public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; and EnviroStor and GeoTracker Databases (accessed 10/24/21).

Hazardous Material Setting:

The California Department of Toxic Substances Control (DTSC) defines a hazardous material as: "a substance or combination of substances that, because of its quantity, concentration or physical, chemical, or infectious characteristics, may either: 1) cause, or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating illness; or 2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed." Regulations governing the use, management, handling, transportation and disposal of hazardous waste and materials are administered by Federal, State and local governmental agencies. Pursuant to the Planning and Zoning Law, DTSC maintains a hazardous waste and substances site list, also known as the "Cortese List."

Hazardous waste management in Cotati is administered by the Sonoma County Waste Management Agency (SCWMA), through the Countywide Integrated Waste Management Plan. The Certified Unified Program Agency (CUPA) program oversees five hazardous materials programs: Hazardous Materials Management Plans (HMMP) program, California Accidental Release Prevention (CalARP) program, underground storage tank (UST) programs, aboveground storage tank (AST) programs, and hazardous waste generation and disposal. The California Department of Industrial Relations, Division of Occupational Safety and Health (DOSH) (formerly known as Cal/OSHA), is charged with enforcement of state regulation and the supervision of workplaces in California that are not under direct federal jurisdiction. State worker health and safety regulation applicable to construction workers include training requirements for hazardous waste operation and emergency response.

There are several sites within the City's Planning Area that are included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. These sites have a history of contamination with hazardous materials and are subject to various state and federal laws and regulators, including the CERCLA, EPA, DTSC, and RWQCB. As presented in the General Plan EIR, of the 20 sites listed pursuant to Government Code Section 65962.5, 14 have completed all required clean-up measures and have had their cases closed. Only six sites remain as open cases and are under various levels of remediation and clean-up compliance.

A review of available records, databases (EnviroStor and GeoTracker) and reports demonstrate that the project site is not listed as a known contamination site and that contamination sites are not expected to have impacted the subject site as they are not in close proximity.

The California Department of Forestry and Fire Protection (CAL FIRE) is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. CAL FIRE's Statewide and County maps (adopted November 2007) depict Fire Hazard Severity Zones (FHSZs) that are within the State Responsibility Area (SRA). The SRA is the area of the state where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within city boundaries or in federal ownership. The FHSZs in the SRA are further classified as being Moderate, High, or Very High.

In addition, CAL FIRE has prepared and transmitted recommendations for Very High FHSZs in those areas where local governments have financial responsibility for wildland fire protection, known as Local Responsibility Areas (LRA). Only lands zoned as Very High FHSZ are identified within the LRA. The City of Cotati in its entirety, including the project site, is categorized as Non-VHFHZ by CAL FIRE.

Hazards/Hazardous Materials Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.9(a-g) (Hazardous Materials, Hazardous Material Sites, Public Airport, Emergency Response Plan, Wildland Fire?) Less Than Significant Impact: The proposed zoning text amendment would allow for Storage-warehouse, inside storage within the CI Zoning District, where similar types of facilities (e.g., light industrial) are currently allowed. All future buildings proposed within the CI zoning district including future SW buildings would be required to comply with all existing federal, state and local safety regulations governing the transportation, use, handling, storage and disposal of potentially hazardous materials. If warranted, a Phase I Environmental Site Assessment would be required through the Use Permit process to identify site-specific hazardous conditions on the project site. All parcels zoned as CI are categorized as Non-VHFHZ by CAL FIRE. The proposed zoning text amendment to allow SW within the CI zoning district is consistent with the General Plan and does not introduce any new or more severe impacts relative to what is currently allowed within the CI zoning district. Therefore, impacts related to hazards and hazardous materials would be less than significant.

Warehouse Building and Facilities

5.9(a,b) (Routine Transport, Upset and Accident Involving Release?) Less Than Significant Impact with Mitigation: Site preparation and construction activities will result in the temporary presence of potentially hazardous materials including, but not limited to fuels and lubricants, paints, solvents, insulation, electrical wiring, and other construction related materials onsite. Although these potentially hazardous materials may be present onsite during construction, the applicant is required to comply with all existing federal, state and local safety regulations governing the transportation, use, handling, storage and disposal of potentially hazardous materials. Once construction is complete there will not be any ongoing use or generation of hazardous materials onsite.

During site preparation and construction activities, Best Management Practices (BMPs) will be implemented in accordance with the Cotati Municipal Code Chapter 13.68 Storm Water Ordinance. BMPs include measures to prevent spills and require onsite materials for cleanup. The applicant is required to comply with all federal and state regulations as overseen by Sonoma County's CUPA.

The project site may potentially support one or more buried underground (septic) tanks. To ensure that groundwater is protected during tank removal **Mitigation Measure HAZ-1** shall be implemented, which requires any underground holding tanks, septic or otherwise, shall be removed and properly disposed of in accordance with Sonoma County regulations. Implementation of measures HAZ-1 through HAZ-2 and compliance with other required regulations governing hazardous materials will ensure that potential hazards to the public or the environment due to upset or accidental release of hazardous materials, will be reduced to less than significant levels.

The project applicant, Bert Sandell, confirmed on June 24, 2021, that clients of the proposed moving and storage use will not be allowed to store hazardous materials in the storage containers, and that the lease with the moving and storage company will not allow hazardous materials to be stored on the property.

5.9(c) (Emit or Handle Hazardous Materials Within ¼ Mile of School?) No Impact: The project site is not located within ¼ mile of a school and no schools are proposed within a ¼ mile of the project site.

5.9(d) (Existing Hazardous Material Sites?) No Impact: The California Environmental Protection Agency (CAL-EPA) annually updates the California Hazardous Waste and Substances Site List (also known as the "Cortese List"). The Department of Toxic Substances Control (DTSC) compiles a record of sites to be included on the list, which is then submitted to the CAL-EPA. A search of EnviroStor, performed on June 24, 2021, showed no active cleanup sites within the project vicinity. A search of Geotracker, performed on June 24, 2021, showed no active cleanup sites within the project vicinity. The project will not create a significant hazard to the public or the environment by virtue of it being located on an identified Cortese site. Therefore, the project will have no impacts due to existing hazardous materials onsite or in the vicinity.

5.9(e) (Public Airport Land Use Plans) No Impact: The project is not located within the boundaries of an airport land use plan; the nearest airports are the Petaluma Municipal Airport located approximately 9 miles southeast of the project site, and the Charles M. Schulz - Sonoma County Airport located approximately 13 miles north of the project site. Therefore, the project would have no impacts associated with airport-related hazards.

5.9(f) (Impair Emergency Response Plan) No Impact: The project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Site plans include ingress and egress access driveways with adequate width necessary to accommodate emergency vehicles and provide connectivity to the existing circulation and street system. California has developed an emergency response plan to coordinate emergency services by federal, state, and local government, including responding to hazardous materials incidents. There are no aspects of the proposed project that will interfere with an adopted emergency or evacuation plan. Therefore, the project will have no impacts due to a conflict with the emergency response plan.

5.9(g) (Wildland Fire Hazards) Less Than Significant Impact: Wildland fires are of concern particularly in expansive areas of native vegetation of brush, woodland, grassland. The project site is located within the City's UGB, is categorized as a Non-VHFHZ by CAL FIRE and surrounded by land designated as Non-VHFHZ on all sides. While the project site is surrounded by roadways and mostly developed land uses, it is also boarded by large expanses of grassland to the south and west. In addition, the project site is located approximately 0.25 mile from land that is designated as "Moderate Fire Hazard Severity Zone" by CAL FIRE. As such, the project could potentially expose people or structures to impacts related to wildland fires.

The Rancho Adobe Fire Protection District (RAFPD) is responsible for protecting life, property, and the environment from fire. The RAFPD responds to calls including structure, wildland, and other fires. Service is provided by three stations located at 1 East Cotati Avenue; 11000 Main Street in Penngrove and 99 Liberty Road in Petaluma. The project site is located approximately 1 mile driving distance of the fire station located at 1 East Cotati Avenue.

The RAFPD has automatic aid agreements with neighboring districts, including the California Department of Forestry (CDF), the City of Rohnert Park and the City of Petaluma. The CDF provides automatic aid for emergency

incidents in the west portions of the District and to State Responsibility Area fires. CDF will also provide fire response to anywhere in the District at the District's request. Under the automatic aid agreement between RAFPD and the City of Rohnert Park, the City of Rohnert Park responds to certain structure fire, water-flow alarm-sounding, vegetation, and vehicle collision calls in the RAFPD service area, including locations in Cotati, and RAFPD provides the City of Rohnert Park with a battalion chief and/or engine and personnel support for certain calls in the City of Rohnert Park. As such, the City of Cotati is well served by fire protection services, which will be extended to the proposed project.

New buildings and structures introduced onsite will be constructed in accordance with the latest building and fire code standards including fire prevention elements such as site design, interior sprinkler systems, fire resistant building materials, onsite fire hydrants and water pressure. Therefore, impacts related to the exposure of people or structures to a significant risk of loss, injury or death involving wildland fires will be less than significant.

Mitigation Measures:

HAZ-1: Any buried holding tanks including septic systems shall be properly decommissioned in accordance with applicable regulations established by the County of Sonoma (Permit & Resource Management Department). Removal of underground tanks shall be immediately followed by backfill in accordance with Engineering recommendations. Materials shall be properly disposed of at permitted facilities.

HAZ-2: In the event that the project involves onsite storage of potentially hazardous materials in sufficient quantities, a Hazardous Materials Business Plan (HMBP) shall be prepared and submitted to the Sonoma County CUPA agency for review and approval. The applicant shall fully comply with all provisions of a HMBP should one be required.

5.10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern on the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would	☐	☐	☒	☐

result in flooding on- or off-site;				
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; Hydrology Report and Initial Storm Water Low Impact Development Submittal, prepared by CALICHI Design Group, May 11, 2021; FEMA letter dated March 18, 2021

Hydrology and Water Quality Setting:

The project site is located within the North Coast hydrologic region, which covers approximately 19,500 square miles and includes all portions of Modoc, Siskiyou, Del Norte, Trinity, Humboldt, Mendocino, Lake, and Sonoma counties, and small areas of Shasta, Tehama, Glenn, Colusa, and Marin counties. The project site is also located within the Russian Hydrologic Unit, which covers approximately 950,249 acres. More specifically, the project site is located within the Upper Laguna de Santa Rosa subarea (Russian), which encompasses 39,712 acres.

The City of Cotati has one water body listed on the 2010 Section 303(d) list of impaired water bodies. Section 303(d) of the Federal Clean Water Act requires States to identify waters that do not meet the water quality standards or objectives and thus, are considered "impaired." Once listed, Section 303(d) mandates prioritization and development of a total maximum daily load (TMDL). The Laguna De Santa Rosa is listed as a category 5 segment, meaning that it is a water segment that is impaired and a TMDL is required. Pollutants listed for this segment include: indicator bacteria, mercury, nitrogen, dissolved oxygen, phosphorous, sedimentation/siltation, and temperature. TMDLs for the pollutants listed above are currently under development by the North Coast Regional Water Quality Control Board (RWQCB).

The City of Cotati is subject to flooding along creeks and drainages that traverse city limits. The Laguna de Santa Rosa and Cotati Creek are the most prominent drainages in Cotati that are subject to flooding. The 100-year floodplain extends onto many properties that are located immediately adjacent to these drainages. Additionally, land to the west of US 101 in the northern part of the City, and a portion of the Downtown Specific Plan Area, is within the 500-year floodplain.

The Federal Emergency Management Agency's (FEMA's) flood hazard mapping program provides important guidance for the City in planning for flooding events and regulating development within identified flood hazard areas. FEMA's National Flood Insurance Program is intended to encourage State and local governments to adopt responsible floodplain management programs and flood measures. As part of the program, the FEMA defines floodplain and floodway boundaries that are shown on the Flood Insurance Rate Maps (FIRMs).

Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre, but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain

coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ from the State Water Resources Control Board.[7] Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer.

Surface water quality is regulated by the North Coast RWQCB via the Water Quality Control Plan for the North Coast Region (Basin Plan). The RWQCB is responsible for implementing Section 401 of the Clean Water Act through the issuance of a Clean Water Certification when development includes potential impacts to jurisdictional areas such as creeks, wetlands or other Waters of the State.

Chapter 13.68 of the Cotati Municipal Code regulates stormwater discharge. Grading and erosion control requirements are set forth in chapter 14.36 of the Municipal Code. Low Impact Development (LID) requirements establish limitations on the stormwater runoff generated by development sites. New development is required to mimic pre-developed conditions, protect water quality and retain runoff from impervious surfaces onsite in accordance with the Santa Rosa Storm Water Low Impact Development Technical Design Manual (LID Manual).

As shown in Figure 3.8-1: Watersheds of the General Plan EIR, the project site is located adjacent to the Laguna de Santa Rosa and Washoe Creek. As shown in Figure 3.8-2: Flood Hazard Map of the General Plan EIR, a portion of the site is located within the 100-year Flood Zone (1.0% annual chance flood hazard). The portion of the site within the 100-year base floodplain was removed by FEMA from the Special Flood Area (SFHA 1.0% annual chance of flood hazard) as delineated in the FEMA Letter of Map Amendment Determination Document (Removal) dated March 18, 2021, Case No: 21-09-0709A. A small portion of the site (1,402 sq. ft.) remains within the 100-year floodplain. The portion of the site remaining within the 100-year floodplain is not proposed for development.

Hydrology and Water Quality Impact Discussion:

Zoning Amendment to Allow SW within IC Zoning District

5.10(a-e) (Violate Water Quality Standards, Decrease Groundwater Supplies, Substantially Alter Drainage Pattern, Conflict with Water Quality Control Plan) Less Than Significant Impact: All parcels, except for the project site, within the CI Zoning District are located outside the 500-year Flood Zone and 100-year Flood Zone. Except for the project site, parcels within the CI Zoning District are improved and developed with onsite facilities that capture runoff and convey flows to the storm drain system.

All future construction activities, within the CI zoning district including future SW buildings are required to adhere to erosion control requirements stipulated in the NPDES Permit issued by the RWQCB. These requirements include the preparation and implementation of a SWPPP that contains BMPs to control erosion, siltation, and contamination impacts to water quality. All future development proposed within the CI zoning district including future SW buildings are required to be built in conformance with the latest Low Impact Development Standards and demonstrate that runoff from new impervious surfaces introduced onsite will be treated, captured and storage in a manner that mirrors pre-development conditions. The proposed zoning text amendment to allow SW within the CI zoning district does not result in any physical development that would alter water quality or stormwater runoff. Further, the zoning text amendment does not introduce any other changes that would affect regulation of water quality or stormwater relative to what is currently required within the CI zoning district. Therefore, impacts related to hydrology and water quality would be less than significant.

Warehouse Building and Facilities

[7] State Water Resources Control Board, Construction General Permit Order 2009-0009-DWQ, http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml, Accessed October 17, 2018.

5.10(a) (Violate Water Quality Standards, Otherwise Degrade Surface or Ground Water Quality) Less Than Significant Impact with Mitigation: Construction activities have the potential to result in runoff that contains sediment and other pollutants that could degrade water quality if not properly controlled. Sources of potential pollution associated with construction include fuel, grease, oil and other fluids, concrete material, sediment, and litter. These pollutants have the potential to result in impacts due to chemical contamination from the release of construction equipment and materials that could pose a hazard to the environment or degrade water quality if not properly managed.

In order to ensure that proper controls and treatment are in place to prevent pollutants from entering stormwater runoff, the project shall adhere to NPDES requirements including the preparation and implementation of a SWPPP and compliance with the RWQCB Order No. R1-2009-0045, Waste Discharge Requirements. Erosion control requirements are stipulated in the NPDES Permit issued by the RWQCB. These requirements include the preparation and implementation of a SWPPP that contains BMPs. The purpose of the SWPPP is to identify potential sediment sources and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination impacts would not occur during construction activities.

Mitigation Measure HYDRO-1 below requires that the project implement a SWPPP with BMPs that include but are not limited to fiber roll protection at all drains, the use of gravel at access driveways during construction, designated washout areas, and the development and implementation of a hazardous materials spill prevention plan. These and other BMPs are designed to protect water quality from potential contaminants in stormwater runoff emanating from construction sites. With implementation of HYDRO-1, the project's potential to result in a violation of water quality standards during construction would be reduced to levels below significance.

An Initial Storm Water Low Impact Development (LID) Submittal was prepared for the proposed project (**Appendix F**). As stated therein, his project will create over 10,000 SF of impervious area, which will trigger the need to implement permanent storm water BMP's. Also, due this project creating more than one (1) acre of impervious area, 100% volume capture and treatment will be necessary. In addition, all tributary areas contain new impervious area, and will therefore need to implement trash capture measures. Trash enclosure is required to have a drain and connect to the sanitary sewer for any potential seepage.

Pollution Prevention and Runoff Reduction Measures:

In addition to the two capture and treatment requirements, the project will be implementing reduction measures to compensate for areas on the site that are untreatable. The two truck docks, as described in the project description, will sit 2.5' lower than the finished floor elevation, and thus make them unfeasible to treat due to existing utility and surface conditions. Per the direction from MOE Engineering, the treatment can be bypassed as long as the site has 100% capture and retention.

Types of Proposed Best Management Practices (BMP's):

In general, the site uses two types of Best Management Practices or BMPs; flow-through planters to satisfy the 10-Year Design Storm Treatment Requirement and StormTech Subsurface Retention Chambers to satisfy the 100% Volume Capture Requirement. For reference throughout this report and the calculations; the flow-through planters are referred to as BMP-1 through BMP-7 and the Retention Chambers are referred to as RET-1 through RET-3.

The delineated drainage basins, described in more detail within the accompanied Hydraulics and Hydrology Report, all flow to their respective flow-through planters (BMP-1 through BMP-7) where the 10-year storm is treated and outfalls into a subsurface StormTech chamber for retention and infiltration. An overflow inlet has been designed in each BMP in order to capture and convey runoff during the 100- year storm event. There are three of these chambers spread throughout the site and referenced as RET1, RET-2 and RET-3. The outfall structures from these chambers utilize restrictor plates to limit the 10-year release rate at or below historic conditions and then outfalls into the existing storm infrastructure along the eastern property boundary.

StormTech Retention Chamber Calculations and Details can be found in Appendix F of the Low Impact Development report.

The flow-through planters are considered Priority 3 of the city standard details. In certain areas, the detail has been slightly modified to work with our site. They are sized using the Santa Rosa Low Impact Development calculator and specifically placed to capture all the runoff throughout the site.

Subsurface Retention Chambers:

The Retention Chambers have been designed and laid out underneath the parking lot to accommodate all the runoff that is conveyed from the flow-through planters for both the 10-year Design Storm and the 100-year check storm. The Santa Rosa Calculation Spreadsheet provides a Storage Volume using CN values which slightly exceed the calculated storage volume when using the 10-year Design Storm. Therefore, the Santa Rosa Storage Volumes have been used to size and retain the runoff within the retention chambers. However, no 100-year detention volume is provided within the Santa Rosa Calculation Spreadsheet so the calculated volume that CDG designed was used to detain this storm. Additionally, due to the irregular shape of the retention chambers, StormTech provided a cumulative storage spreadsheet to allow us to correctly set the invert elevations for the pipes entering and leaving each system. This is contrary to the Santa Rose Detention Calculator which assumes the subsurface chambers are rectangular. All calculations and details can also be found in Appendix F of the Low Impact Development report.

Each Retention Chamber has been designed to accommodate the drainage areas that are conveyed to them, but they in general they perform similarly with varying elevations for release and storage. As the water enters the system, it begins to fill up and work its way throughout the system to evenly distribute the captured runoff throughout the surface area of the chamber. Stone with 40% infiltration rate is placed around these chambers, 6 inches in all directions. This allows the runoff to seep in and fill the chambers from the bottom up. Once the runoff reaches the 10-Year Peak Design Storm Retention Volume, it passes through an orifice that only allows enough flow to escape that is at or below pre-construction conditions. As the runoff continues to build, the chambers restrict the release until the 100-Year Detention Volume is reached where it then begins to release the rest of the runoff at the 100-year Storage Volume Elevation. As aforementioned, the calculations performed by CDG determined the retention volumes to be less than what was determined by the Santa Rosa LID Calculator. However, to be conservative, the storage volume was increased to accommodate the additional volume determined by the Santa Rosa LID Calculator. To help clarify which flow-through planters are going to which retention chambers, the following descriptions are given. These can also be seen in Appendix B of Low Impact Development report.

RET-1: This Subsurface Infiltration Chamber accepts runoff from BMP-1, BMP-2 and directly from the trench drain within PR-9. RET-2: This Subsurface Infiltration Chamber accepts runoff from BMP-3, BMP-4, BMP-6 and BMP-7. RET-3: This Subsurface Infiltration Chamber accepts runoff from BMP-5 and directly from the trench drain within PR-8.

Maintenance:

Flow-Through Planter maintenance: At a minimum, each planter needs to be inspected twice annually for ponded water. If ponded water is observed, the perforated pipe shall be cleaned. If ponded water remains, further grading and replacement may be necessary to prevent mosquito breeding.

StormTech Infiltration Chamber maintenance: These BMP's will need to be inspected twice annually for sediment build up. Inspection can be accomplished through a manhole or inspection port from the surface. If sediment is observed to have accumulated an average depth exceeding 3', cleanout is required. Detailed maintenance instructions are provided in Appendix F of the Low Impact Development report.

Responsible Party:

The property owner will be the responsible party for the maintenance of each BMP.

5.10(b) (Groundwater Supply and Recharge) Less Than Significant Impact: The moving and storage warehouse will utilize potable water from the City's water system for all onsite water needs including indoor use and outdoor irrigation. Potable water supplies will be provided to the site via connection to the existing 10-inch water main pipeline located within Blodgett Street. The project's water demand is consistent with the City's overall water demand that is anticipated by the City of Cotati 2015 General Plan and Urban Water Management Plan. Groundwater reserves will not be significantly impacted by the proposed development as no groundwater extraction will occur onsite, nor is the project located in a groundwater recharge area (Sonoma County Ground Water Availability Map, 2016). Therefore, the project will have a less than significant impact to groundwater supplies and recharge and would not impede sustainable groundwater management of the basin.

5.10(ci – civ) (Erosion or Siltation, Flooding On- or Off-site, Storm Drain Capacity, Impede or Redirect Flood Flows) Less Than Significant Impact:

Existing Drainage:

The existing site drains towards various low points throughout the parcel. A high point, at approximately 98 ft. above sea level, exists near the middle of the Northern property line. A large portion of the site's storm water flows away from this spot, pooling around the base of it. A few other high points exist within the western portion of the site, all at approximately 96 ft. Most of the site's storm water collects within the parcel; however, a small portion on each side of the property has offsite runoff. Along the Northeastern property line, some of the runoff flows into the Laguna De Santa Rosa. This waterway has elevations as low as 84 ft. Along the Northwestern property line, some of the runoff flows into a nameless branch of the Laguna De Santa Rosa. This waterway eventually flows into Gossage creek (according to google maps). Along the Southeastern property line, a very small portion of runoff flows onto the adjacent lots. Finally, along the Southeastern property line, some of the runoff flows into the adjacent property's parking lot, which is eventually collected by their catch basins. In summary, the entirety of the runoff from the site ultimately outfalls into Laguna De Santa Rosa.

Impacts of Proposed Drainage:

The storm system has been designed to treat, retain and restrict the 10-year peak flow prior to releasing it at or below historic conditions via existing storm infrastructure that runs along the eastern property boundary and ultimately outfalls to the Laguna De Santa Rosa. The proposed design ensures that in proposed conditions, the new development will not adversely affect the downstream conditions. The subsurface retention chambers, **discussed in more detail in Section 2 of this report, are sized to retain the 10-year peak storm and detain the 100-year storm. Any additional flow will overtop the curb and flow into the existing creek.**

Hydrology & Hydraulic Calculations:

Pre- & Post-development Analysis-To determine the amount of flow that can be released from the site in proposed conditions, analysis of the existing conditions is imperative. Utilizing the survey that was received from Sousa Land Surveys preformed on February 22, 2021, a Pre-Construction Drainage Map was created and a single drainage basin was delineated to depict the runoff from the limits of disturbance since the entire site ultimately enters Laguna De Santa Rosa. This basin is denoted as EX-1 for calculations and reference. Additionally, sheet 4 of 11, "Grading & Street Improvements" from the Kandy Business Park Plan Set dated November 2000 was used to determine the offsite runoff to the existing public storm system that CDG proposes to connect.

In proposed conditions, the site was separated into nine drainage basins denoted as PR-1 through PR-9. Each basin has been paired with a flow-through planter which were determined to be the Best Management Practice denoted as BMP-1 through BMP-7 with the exception of PR-8 and PR-9 which have been described in more detail

in this section. Basins will be seen as incorporating surface flow along with roof drainage. As such, they will enter into the same BMP prior to being conveyed to the subsurface retention chambers. Along with using the typical sheet flow, concentrated flow and pipe flow to calculate Time of Concentration, CDG included 5-minutes of roof drainage and 5-minutes of infiltration time through the flow-through planters. Hydrology Calculations outlining the Time of Concentration and Flow Rate can be found in Appendix B of this report. Detailed calculations outlining the Retention Calculations within the StormTech Subsurface Retention Chambers and the Flow-Through Planters can be found in the Santa Rosa Low Impact Development (LID) Report submitted concurrently with this report.

In general, the basins all flow to their respective flow-through planters where the 10-year storm is treated and outfalls into a subsurface chamber for retention. An overflow inlet has been designed in each flowthrough planter in order to capture and convey runoff during the 100-year storm event. There are three of these subsurface retention chambers spread throughout the site and referenced as RET-1, RET-2 and RET3. See Appendix A of the report for the Pre-Construction Drainage Map and Stormwater Control Plan included with this report that outlines these locations and delineate the drainage basins. The outfall structures from these chambers utilize restrictor plates to limit the 10-year flow at or below historic conditions and then outfalls into the existing storm infrastructure along the eastern property boundary.

The proposed subject site does not currently flow into this storm sewer, but rather flows into the Laguna De Santa Rosa. The proposed design ensures that the total flow that enters the Laguna De Santa Rosa as a whole is at below historic conditions and capacity within the existing storm system is not exceeded. In order to bring clarity to the Proposed Drainage Area Map, the following descriptions break down the drainage areas.

PR-1: Basin PR-1 includes the northeast quadrant of the building and the northeast corner of the site. The runoff from the roof outfalls to the northern drive aisle and flows east where it enters a grate inlet and outfalls into BMP-1 where it is treated and then conveyed to RET-1 and ultimately connects to the existing storm infrastructure.

PR-2: Basin PR-2 includes the southeast quadrant of the building and the southeast corner of the site. The runoff from the roof outfalls to the northern drive aisle and flows east where it enters a grate inlet and outfalls into BMP-2 where it is treated and then conveyed to RET-1 and ultimately connects to the existing storm infrastructure.

PR-3: Basin PR-3 includes the southwest quadrant of the building and a portion of the sidewalk just south of the building. The runoff from the roof outfalls to the southern sidewalk and flows directly into BMP-3 where it is treated and then conveyed to RET-2 and ultimately connects to the existing storm infrastructure.

PR-4: Basin PR-4 includes the southwest portion of the site where the runoff is conveyed to a grate inlet that outfalls into BMP-4 where it is treated and then conveyed to RET-2 and ultimately connects to the existing storm infrastructure.

PR-5: Basin PR-5 includes the northwest quadrant of the building and the northwest corner of the site. The runoff from the roof outfalls to the northern drive aisle and flows west where it enters a grate inlet and outfalls into BMP-5 where it is treated and then conveyed to RET-3 and ultimately connects to the existing storm infrastructure.

PR-6: Basin PR-6 includes the drive aisle and sidewalk south of the southeast corner of the building. The runoff from the drive aisle flows to a grate inlet that outfalls into BMP-6 where it is treated and then conveyed to RET-2 and ultimately connects to the existing storm infrastructure. Additionally, the runoff from the sidewalk in this area flows directly into BMP-6 and continues on the same path as the drive aisle runoff.

PR-7: Basin PR-7 includes the drive aisle, a portion of the parking and sidewalk south of the southwest corner of the building. The runoff from the pavement flows to a grate inlet that outfalls into BMP-7 where it is treated and then conveyed to RET-2 and ultimately connects to the existing storm infrastructure. Additionally, the runoff from the sidewalk in this area flows directly into BMP-7 and continues on the same path as the drive aisle runoff.

PR-8: Basin PR-8 includes the truck dock to the west of the building. The elevation here is too low to be conveyed to a flow-through planter for treatment so it is conveyed directly to RET-3, that has been sized to accommodate the excess runoff.

PR-9: Basin PR-9 includes the truck dock to the east of the building. The elevation here is too low to be conveyed to a flow-through planter for treatment so it is conveyed directly to RET-1, that has been sized to accommodate the excess runoff.

OS-1 & OS-2: As aforementioned, these two basins were taken from sheet 4 of 11, "Grading & Street Improvements" from the Kandy Business Park Plan Set dated November 2000. This allowed us to check the capacity of the existing storm line to ensure it had capacity to allow for additional flow from our site. Since the proposed subject site does not currently outfall any runoff to these inlets, it was a critical piece to determine if it could handle the amount of runoff released from the site that historically flowed directly into Laguna De Santa Rosa. The full Existing Pipe Capacity Analysis Calculations have been included in Appendix E of this report, but a portion of these calculations can be seen following this paragraph that proves the existing pipe still has 10.01 cfs during the 10-year storm event.

Hydraulic Grade Line for Proposed Condition: The Hydraflow Reports and Profiles shown in Appendix D of this report show the Hydraulic Grade Line to ensure they remain within the pipes during the 10-year Peak Design Storm and the 100-Year Check Storm.

Post Development Storm Water Levels and Pollutant Discharges: Post development discharge will not exceed existing discharge per design storm. Additionally, the required amount of treatment has been achieved through the use of flow-through planters (BMP-1 – BMP-7) and 100% volume capture within the subsurface retention chambers (RET-1 – RET-3). For additional information regarding treatment and retention of the stormwater, see the SWLID Report that was submitted with this report. The proposed project will not alter the course of a stream or river. The majority of the project site consists of grasses. The soils in the project area are moderately well-draining clay loams with a clay subsoil underlain by old terrace-alluvium.[8] Impervious surfaces currently occupy a portion of the project site including hardscape area of gravel and buildings. Stormwater currently percolates into the project site where well-draining soils are present and runoff via sheet flow where impervious surfaces exist or as onsite soils become saturated. Excess stormwater runoff from the project site currently flows southeasterly towards Alder Avenue and into the City's existing storm drain system.

While the proposed project would introduce new impervious surfaces onsite, implementation of the Initial Storm Water LID Submittal would ensure that the proposed project would not substantially increase the rate or amount of surface runoff, nor provide additional sources of polluted runoff. Therefore, the project will not cause substantial erosion or siltation on- or off-site nor will it cause flooding on- or off-site. Impacts to the drainage pattern, storm drain system, or related to polluted runoff as a result of the proposed project would be less than significant. Furthermore, implementation of the proposed project will result in less than significant impacts related to impeding or redirecting flood flows, as almost the entire project site, and the surrounding properties are not within high risk flood areas. In addition, the project will not alter any stream.

5.10(d) (Release Pollutants Due to Project Inundation) Less than Significant Impact: As shown in Figure 3.8-2: Flood Hazard Map of the General Plan EIR and FEMA maps a small portion of the project site (20,468 sq. ft.) is located within the 100-year Flood Zone, which is considered to be a flood hazard area. FEMA has approved a LOMA which removes all but, 1,400 sq. ft. from the 100-year floodplain. This small portion of the site within the floodplain is not proposed for development. As described above, the project proposes onsite stormwater collection and treatment facilities which minimize the likelihood of the project site being inundated during a flood.

[8] Cultural Resources Study, prepared by Tom Origer & Associates, June 23, 2016.

The project site is not located near any large bodies of water that would be susceptible to a seiche. The City of Cotati is sufficiently distant from the San Francisco Bay to preclude effects from a tsunami. Furthermore, according the California Department of Conservation, the project site is not located within an affected USGS Quadrangle on the Sonoma County Tsunami Inundation Map.[9] Therefore, the project would have no impacts related to the release of pollutants due to project inundation from a tsunami or seiche.

5.10(e) (Water Quality Control Plan or Sustainable Groundwater Management Plan) Less Than Significant Impact: The City of Cotati is within a regional watershed administered by the North Coast RWQCB. The RWQCB has established regulatory standards and objectives for water quality presented in the North Coast Basin Plan, June 2018. There are no sustainable groundwater management plans that include the City of Cotati. As described in 5.10(a), impacts related to water quality or the degradation of surface or groundwater quality are considered less than significant. Therefore, the proposed project will not result in a conflict with or obstruct implementation of the Basin Plan, and impacts are less than significant.

Mitigation Measures:

HYDRO-1: In accordance with the National Pollution Discharge Elimination System regulation, the applicant shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) during all stages of construction. The SWPPP shall address erosion and sediment controls, proper storage of fuels, temporary erosion control including fiber rolls, staked straw bales, geofabric, sandbags, and materials for the cleanup of hazardous spills. Sediment shall be retained onsite by a system of sediment basins, traps, or other appropriate measures. A Notice of Intent, fees, and other required documentation shall be filed with the Regional Water Quality Control Board. During construction, a monitoring report shall be conducted weekly during dry conditions and three times a day during storms that produce more than 1/2" of precipitation.

5.11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; and Cotati Bicycle and Pedestrian Master Plan, prepared by Sonoma County Transportation Authority, adopted December 2008, updated April 22, 2014.

Land Use and Planning Setting:

Cotati is predominantly a single-family residential community, with lower (rural) densities located west of Highway 101 and a range of densities from rural residential to higher density multi-family located east of Highway

[9] California Department of Conservation, Sonoma County Tsunami Inundation Maps, https://www.conservation.ca.gov/cgs/Pages/Tsunami/Maps/Sonoma.aspx, Accessed February 12, 2019.

101. Commercial uses are located downtown along Old Redwood Highway and in commercial centers along Gravenstein Highway and East Cotati Avenue. Offices are located downtown, within the industrial park on the City's northwest border, and along East Cotati Avenue. The Redwood Drive industrial area houses the bulk of the City's warehousing, distribution, and manufacturing uses. Rural and agricultural lands are located to the south and west of Cotati.

The proposed project is subject to land use policies outlined in the Cotati General Plan which has been adopted for the purpose of avoiding or mitigating an environmental effect. The following policies, goals and objectives from the General Plan are particularly applicable to the subject project:

Goal LU-1: Establish an efficient, harmonious, and environmentally sensitive land use pattern that enhances Cotati's small-town character, provides adequate space to accommodate sustainable economic and housing growth, and encourages orderly growth.

Policy LU 1.1: Maintain a supply of developable mixed-use, commercial, industrial, and residential lands sufficient to meet desired growth and economic needs over the planning period.

Objective LU 1B: Ensure that new growth is focused around existing development and does not facilitate the inefficient extension of city services.

Action LU1b: Combine the Commercial/Industrial and General Industrial Districts into a single district that accommodates the range of industrial and commercial uses allowed in the Commercial Industrial Land use designation.

Cotati Bicycle and Pedestrian Master Plan

Existing and planned bicycle and pedestrian facilities in Cotati are shown in the Cotati Bicycle and Pedestrian Master Plan, adopted in December 2008 and updated April 2014. The Plan identifies two Pedestrian Districts in Cotati (areas of high activity where pedestrian improvements should be prioritized) including downtown/Old Redwood Highway between SR 116 and Henry Street, and the area immediately surrounding the Thomas Page Elementary School. Bicycle circulation in Cotati is supported by an existing network of multi-use paths, on-street bike lanes, and bicycle routes. Notable facilities include a segment of the Laguna de Santa Rosa bike path between Commerce Boulevard (in Rohnert Park) and the southern City limits (with one small gap just south of East Cotati Avenue), and on-street bicycle lanes within the City limits on West Sierra Avenue and East Cotati Avenue.

As stated in Objective CI 2A of the General Plan, the City is striving to maintain and develop a network of sidewalks and pathways to provide for safe and convenient pedestrian travel. In particular, Policy CI 2.3 requires development projects to construct sidewalks and walkways on- and off-site in order to maintain consistency with the Cotati Bicycle and Pedestrian Master Plan, and as dictated by the location of transit stops and common pedestrian destinations.

According to the Cotati Bicycle and Pedestrian Master Plan, and as shown on Figure 2.2 of the General Plan, there are no existing bicycle or pedestrian facilities adjacent to the project site. The Sonoma County Transportation Authority (SCTA) Countywide Bicycle and Pedestrian Master Plan includes a proposed Class 1 Bike path along the north side of the Laguna de Santa Rosa. This project will complete a sidewalk at the west end of Blodgett Street (cul-de-sac).

Land Use and Planning Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.11(a-b) (Divide an Established Community, Land Use Plan, Policy, Regulation Conflict) No Impact: The proposed zoning text amendment would allow for future development applications to be received for

Storage-warehouse, indoor storage within the CI Zoning District. Under existing conditions, the CI Zoning District currently allows for a variety of similar types of uses including light industrial. Allowing SW uses, with a use permit, within the CI district is consistent with the General Plan and would not introduce any conflicts as similar types of uses are already allowed within the CI Zoning District. Therefore, there would be no land use impacts from the proposed zoning text amendment.

Warehouse building and facilities

5.11(a) (Divide an Established Community) No Impact: Division of an established community typically occurs when a new physical feature, in the form of an interstate or railroad, physically transects an area, thereby removing mobility and access within an established community. The division of an established community can also occur through the removal of an existing road or pathway, which would reduce or remove access between a community and outlying areas.

The project proposes development on an undeveloped parcel within the City limits and the west end of Blodgett Street which is developed with light industrial uses.

Construction of the proposed project would not introduce a new physical feature that would remove mobility and access within an established community. Likewise, the project does not propose the removal of an existing road or pathway that could reduce or remove access between a community and outlying areas. In addition, the project proposed to install frontage improvements that will increase mobility within the community, including the construction of sidewalks. Therefore, the project would have no impact due to the physical division of an established community.

5.11(b) (Land Use Plan, Policy, Regulation Conflict) Less Than Significant Impact: The proposed project is required to comply with various policy documents, including the Cotati 2015 General Plan, the City of Cotati's Zoning Ordinance, and the Bicycle and Pedestrian Master Plan. The construction of a moving and storage warehouse uses is generally compatible with the current land use and zoning designations for the project site, which are Commercial/Industrial (land use) and Commercial/Industrial(zoning). The current zoning designation allows light industrial, commercial, and business park uses. With the proposed zoning text amendment included as part of this proposed project, Storage-warehouse, inside storage will be allowed within the Commercial/Industrial Zoning Designation, with a Use Permit. The proposed project requires a Use Permit for the moving and storage warehouse as part of the project entitlement process.

Overall, the proposed project is consistent with the general policies, goals and objectives of the Cotati General Plan. Therefore, the potential impacts due to a conflict with City of Cotati regulations are less than significant.

Mitigation Measures: None Required.

5.12. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Sources: City of Cotati 2015 General Plan; General Plan EIR; and geotechnical and soil investigation, prepared by Reese and Associates Engineers, March 26 2021.

Mineral Resources Setting*:* The California Surface Mining and Reclamation Act of 1975 (SMARA) identifies mineral resources within California. These maps identify and classify mineral resources as to their relative value for extraction. To date, no aggregate mineral resources or other significant mineral resources have been mapped within the City of Cotati.

Mineral Resources Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.12(a-b) (Mineral Resources or Resource Plans) No Impact: There are no known mineral resources within the City of Cotati, and none of the parcels zoned as CI have been delineated as locally important resource recovery sites. Therefore, the proposed zoning amendment will have no impact to mineral resources.

Warehouse building and facilities

5.12(a-b) (Mineral Resources or Resource Plans) No Impact: There are no known mineral resources within the City of Cotati. Soil studies conducted as part of the Geotechnical Feasibility Evaluation did not reveal the presence of any mineral resources onsite. The project site has not been delineated as a locally important resource recovery site. The project will not result in the loss of availability of a known mineral resource, including those designated as "locally important." Therefore, the proposed project will have no impacts due to the loss of availability of mineral resources.

Mitigation Measures: None Required.

5.13. NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Sources: City of Cotati 2015 General Plan; General Plan EIR; Acoustics, Nosie, Vibration Report, Wilson Ihirg, February 11, 2021

Noise Setting:

Noise is generally defined as unwanted sound. It is characterized by various parameters that include the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). The sound pressure level is the most common descriptor used to characterize the loudness of an ambient (existing) sound level. The decibel (dB) scale is used to quantify sound intensity but given that the human ear is not equally sensitive to all frequencies in the entire spectrum, noise measurements are weighted more heavily for frequencies to which humans are sensitive in a process called "A-weighting," written as "dBA" and referred to as "A-weighted decibels". In general, human sound perception is such that a change in sound level of 1 dB cannot typically be perceived by the human ear, a change of 3 dB is just noticeable, a change of 5 dB is clearly noticeable, and a change of 10 dB is perceived as doubling the sound level.

The primary noise sources within the Cotati City limits include vehicular traffic, residential maintenance activities, residential air conditioning units and swimming pool pumps, entertainment venues, child-care centers, gas stations, car washes, school playgrounds, public parks, commercial business activities, and light industrial facilities. Commercial and light industrial uses can generate noise due to regular operations such as fans, blowers, chillers, compressors, boilers, pumps, and air conditioning systems which may run for 24 hours a day. Other sources of noise in these areas, such as horns, buzzers, and loading activities may be intermittent.

The City of Cotati regulates the noise environment through Section 17.30.050 of the Municipal Code, which establishes exterior and interior noise level limits for land uses. The maximum allowable exterior noise level at residential care facilities is 65 dBA Ldn, and the maximum allowable interior noise level is 45 dBA Ldn. The exterior and interior noise limits established in Section 17.30.050 of the Municipal Use Code are consistent with the Land use Compatibility for Community Noise Environment standards identified in the Cotati General Plan. The General Plan also establishes the following relevant goals, objectives, policies, and actions:

Objective N 1A: Minimize Noise Levels to Enhance the Quality of Existing and Future Land Uses.

Policy N 1.1: Ensure the noise compatibility of existing and future uses when making land use planning decisions.

Policy N 1.3: Require development to mitigate excessive noise through best practices, including building location and orientation, building design features, placement of noise-generating equipment away from sensitive receptors, shielding of noise-generating equipment, placement of noise-tolerant features between noise sources and sensitive receptors, and use of noise-minimizing materials such as rubberized asphalt.

Policy N 1.15: Require new development to minimize vibration impacts to adjacent uses during demolition and construction. For sensitive historic structures, a vibration limit of 0.08 in/sec PPV (peak particle velocity) will be used to minimize the potential for cosmetic damage to the building. A vibration limit of 0.30 in/sec PPV will be used to minimize the potential for cosmetic damage at buildings of normal conventional construction.

Policy N 1.6: Support noise-compatible land uses along existing and future roadways, highways, and freeways.

Policy N 1.7: The following criteria shall be used to determine the significance, for projects required by the CEQA to analyze noise impacts, of noise impacts for development, transportation, and other projects that increase noise:

Policy N 1.8: Ensure that new development does not expose indoor sleeping areas to indoor noise levels in excess of 45 dBA Ldn.

Significance Criteria for Noise

The following summarizes the City of Cotati's significance criteria for assessing project level impacts on the ambient noise environment.

- A significant impact will occur if the project results in an exceedance of the noise level standards contained in this Noise Element, or the project will result in an increase in ambient noise levels by more than 3 dB; and
- A vibration limit of 0.3 inches/second, peak particle velocity (in/sec PPV) to minimize cosmetic damage at buildings of normal conventional construction. For sensitive historic structures, a vibration limit of 0.08 in/sec PPV is established to minimize cosmetic damage to the building; and
- Where existing traffic noise levels are less than 60 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +5 dB Ldn increase in roadway noise levels will be considered significant; and
- Where existing traffic noise levels range between 60 and 65 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +3 dB Ldn increase in roadway noise levels will be considered significant; and
- Where existing traffic noise levels are greater than 65 dB Ldn at the outdoor activity areas of noise-sensitive uses, a + 1.5 dB Ldn increase in roadway noise levels will be considered significant.

Noise Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.13(a-c) (Temporary or Permanent Noise Increase, Groundborne Vibration and Noise) No Impact: The proposed zoning text amendment would allow for future development applications to be received for Storage-warehouse, inside storage in the CI Zoning District. Under existing conditions, the CG Zoning District currently allows for a variety of similar types of uses including light industrial and commercial uses. Allowing SW uses, with a use permit, within the CI district is consistent with the General Plan and would not introduce any conflicts as similar types of uses are already allowed within the CI Zoning District. The future construction of a moving and storage warehouse within the CI Zoning District, would introduce similar uses to those that are currently allowed in the District. As such, allowing warehouse buildings within the CI Zoning District is not anticipated to generate a substantial permanent increase in ambient noise levels, as compared to what is currently allowed in the District. Construction activities for warehouse buildings would be required to control for noise and vibration impacts to sensitive receptors, in accordance with Cotati's General Plan and Zoning Ordinance.

5.13(a) (Temporary or Permanent Noise Increase) Less Than Significant Impact with Mitigation:

Construction Noise

Construction of the proposed project would result in temporary and intermittent noise increases onsite and in the project vicinity from the use of heavy equipment, truck deliveries and off-haul of materials. Construction noise associated with the proposed project would be perceptible to established uses in the immediate including workers/customers of nearby commercial and industrial uses to the north, east and south.

Noise impacts resulting from construction of the project depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), in areas immediately adjoining noise-sensitive land uses, or over extended periods of time.

Construction of the proposed project is anticipated to occur over a 12-month period and would include demolition, site preparation, grading and excavation, trenching, building erection, and paving. During each stage of construction, there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location at which the equipment is operating.

Most construction equipment generates maximum noise levels within the range of 80 to 90 dBA Lmax at a distance of 50 feet. Typical hourly average construction-generated noise levels for residential developments are about 81 to 88 dBA Leq measured at a distance of 50 feet from the center of the site during busy construction

periods (e.g., earth moving equipment, impact tools, etc.). Hourly average construction noise levels associated with the erection of the proposed buildings, such as hammer- and drilling-related noise, would range from approximately 63 to 71 dBA at a distance of 50 feet. As such, construction noises generated by project development may occasionally result in temporary increases in ambient noise levels in and around the project site and may occasionally reach intrusive levels.

As such, **Mitigation Measure NOI-1** shall be implemented which requires best construction management practices to reduce construction noise levels emanating from the site, limit construction hours, and minimize disruption and annoyance due to noise exposure. With implementation of NOI-1, exposure of existing commercial uses to excessive noise levels generated during construction activities will be reduced to less than significant levels. The site is not located in close proximity to existing residences or other noise-sensitive uses. The nearest residences are approximately 800 feet away.

Permanent Increase in Ambient Noise Levels

Noise resulting from project-generated traffic would not be expected to substantially increase ambient noise levels in the area due to minimal amount of traffic generated by moving and storage company.

Mechanical Equipment

The proposed project will include mechanical equipment such as heating, ventilation, and air conditioning systems, and are required to achieve standards established by the City's Noise Ordinance thresholds. Section 17.30.050 of the Municipal Code provides that the maximum allowable exterior noise level at residential land uses is 65 dBA Ldn. As currently proposed, mechanical HVAC equipment will be located on rooftops of the warehouse building, behind a parapet wall. Rooftop mechanical equipment noise levels for mid-rise structures usually range from 60 to 70 dBA Leq at a distance of 50 feet, assuming direct line of sight between receiver and mechanical equipment. Given the distance of the residential property lines from the HVAC equipment, and shielding from the parapet walls and building, noise levels at any residential property lines are not be expected to exceed 65 dBA Ldn. Therefore, noise impacts from mechanical equipment will be less than significant.

Predicted operational noise levels by the project boundaries

Based on the operational information provided and the results of measurements conducted at a similar facility, the report **(Appendix H)** includes predictions of expected levels of noise resulting from those operations. The operations will consist of the arrival of individual containers by small local delivery trucks and by larger Tractor/Trailer trucks which are capable of handling three containers at the time. After arrival, the trucks park in designated areas and turn their engines off. Propane-gas powered forklifts then remove and replace containers off/onto the trucks and store them inside the warehouse for long-term storage or temporarily outside. After the loading/unloading of the trucks takes place, they start their engines, idle for a few seconds and then leave the facility. Measurements of the noise produced by these operations were conducted at a facility similar to the one proposed located in the city of Benicia. Based on the result of these measurements and on the expected frequency of operations at the Cotati facility, predictions were made of the expected future level of noise by the nearest receiving land uses to the project. The approximate center points of the front and rear yards were used as the reference locations from which the distances to the nearest property lines were calculated, as those areas are where most of the activities are expected to take place. Please see Figure 1 below for a graphical description of the expected activity areas and of the distances to the nearest property lines. The expected levels of noise at the three points studied located at approximately 270 feet to the north, 100 feet to the east and 195 feet to the south are 30 Ldn, 39 Ldn and 33Ldn respectively. These levels are significantly lower than the 75 dBA Ldn in outdoor areas allowed by the Municipal Code for Office land uses and even the 65 Ldn allowed for Residential and other noise-sensitive land uses. This is due to the very brief duration of noise-producing events such as trucks entering and then parking, forklifts moving containers for very short distances which were observed to last between 10 and 15 seconds, and for the modest number of operations that are expected to take place on a given day. Please see the worksheet in Figure 2 for a summary of the assumptions made, observed noise levels

produced by each equipment at short distances and resulting noise levels at the three property line points studied.

Based on the results from the measurements conducted at a similar facility, the expected volume of operations at the future facility and the distances to the property lines, the predicted operational noise to be produced by the proposed facility is expected to fully comply with current City of Cotati legislation requirements.

5.13(b) (Groundborne Vibration and Noise) Less Than Significant Impact: Operation of heavy construction equipment, particularly pile driving and other impact devices such as pavement breakers create seismic waves that radiate along the surface of the earth and are experienced as ground vibration. Vibration from operation of equipment can result in effects ranging from annoyance of people to damage of structures. Varying geology and distances result in different vibration levels containing different frequencies and displacements.

Temporary construction activities associated with the SW project, such as grading and compaction have the potential to generate groundborne vibration. Building construction, paving, and other site improvements will also require the operation of heavy-duty construction equipment, which will contribute to the ambient noise environment. As the project is not expected to require pile driving, equipment such as vibratory rollers, large bulldozers and jackhammers are expected to generate the highest ground vibration levels.

Table 1 below provides the vibration source levels at 25 feet for various types of construction equipment:

Table 1: Vibration Source Levels for Construction Equipment

EQUIPMENT	PPV AT 25 FEET (IN/SEC)
Vibratory roller	0.210
Large bulldozer	0.089
Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003

Source: Transit Noise and Vibration Impact Assessment, United States Department of Transportation, Federal Transit Agency, Office of Planning and Environment, May 2006.

The nearest existing sensitive receptors to the construction area are the existing residences north of the site (approximately 800 feet away).

5.13(c) (Airport Noise) No Impact: The proposed project is not located within two miles of a public airport or public use airport, nor is it located near a private airstrip. As such, residents and workers at the project site would not be exposed to excessive noise levels as a result of being located within an airport land use plan area or within the vicinity of a private airstrip. Therefore, no impacts due to excessive airport noise exposure would occur.

Mitigation Measures:

NOI-1: all construction activities shall be required to comply with the following and be noted accordingly on construction plans:

1. Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm on weekdays and 9:00 am and 5:00 pm on Saturdays (if allowed through specific project conditions of approval). No construction shall occur on Sundays or holidays.
2. All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.

3. The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
4. At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from adjacent uses.
5. Unnecessary idling of internal combustion engines shall be prohibited.
6. Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
7. The required construction-related noise mitigation plan shall also specify that haul truck deliveries are subject to the same hours specified for construction equipment.

5.14. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial unplanned growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Sources: City of Cotati 2015 General Plan; General Plan EIR; U.S. Census Bureau; and Cotati Housing Element, adopted May 19, 2015.

Population and Housing Setting:

According to the City's Housing Element, the population of Cotati has increased steadily over the years, growing from 3,346 persons in 1980 to 7,265 persons in 2010. The decade from 1980 to 1990 experienced the greatest population increase, 71 percent. From 2000 to 2010, the population increased from 6,471 to 7,265 persons, an increase of 1.2 percent per year. According to the U.S. Census Bureau, Population Estimates Program, as of July 1, 2018, the City of Cotati's population was 7,599 people.

Population and Housing Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.14(a-b) (Substantial Unplanned Growth, Displacement of People or Housing) No Impact: The proposed zoning text amendment would allow for future development applications to be received for Storage-warehouse, inside storage within the CI Zoning District. Under existing conditions, the CI Zoning District currently allows for a variety of similar types of uses including industrial and commercial facilities. Allowing SW uses, with a use permit, within the CI District is consistent with the General Plan and would not introduce a substantial amount of unplanned growth, nor would it displace people or housing, as SW uses are similar to the types and densities of uses are already allowed within the CI Zoning District. Any new SW buildings within the CI Zoning District will be reviewed, through the Use Permit process, to ensure that the projects would not induce substantial unplanned population growth at levels beyond what has been anticipated by the City's Planning documents. Therefore, there would be no impact to population and housing from the proposed zoning text amendment.

Warehouse building and facilities

5.14(a) (Substantial Unplanned Growth) Less Than Significant Impact: The project site is located within the City limits and will not directly or indirectly induce substantial unplanned population growth. The project proposes the construction of a 50,000 sq. ft. storage warehouse to be used by a moving and storage company. . The proposed project would employ approximately 10 workers. The projected number of workers would not constitute a substantial increase in unplanned population. As a result, the project is consistent with the General Plan.

The project site is located within the City limits and would connect to the existing utilities within Blodgett Street. As such, the project site is well served by existing services and infrastructure and will not require the extension or construction of new utilities to provide adequate service. There are no other elements of the project that would induce growth at levels beyond what has been anticipated by the City's Planning documents. Therefore, the project will have a less than significant impact, directly or indirectly, related to unplanned population growth.

5.14(b) (Displacement of People or Housing) No Impact: The project involves the construction of a storage warehouse on a vacant undeveloped parcel within an existing industrial/commercial business park. The project does not include the removal of any housing units. Therefore, there are no impacts related to the displacement of housing or people.

Mitigation Measures: None Required.

5.15. PUBLIC SERVICES

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

Sources: City of Cotati 2015 General Plan; General Plan EIR; and Cotati Housing Element, adopted May 19, 2015.

Public Services Setting:

The City of Cotati is well served by established public services including fire and police protection, schools and parklands. In order to offset the cost of improving or expanding City services to accommodate the demand generated by new development the City charges one-time impact fees on new private development. Development impact fees finance public service improvements and pay for new development's fair share of the costs necessary to maintain acceptable levels of service related to fire and police protection services, open space, parkland and other such public services.

Public Services Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.15(a-e) (Fire Protection, Police Protection, Schools, Parks, Other Public Facilities) Less Than Significant Impact: The proposed zoning text amendment would allow for future development applications to be received for storage-warehouse facilities within the CI Zoning District. Under existing conditions, the CI Zoning District currently allows for a variety of similar types of uses including commercial/industrial facilities. Allowing SW uses, with a use permit, within the CI district would not adversely impact service ratios, response times or other performance objectives for fire and police protection, schools, and parks. Future development within the CI district would occur incrementally and would be subject to all General Plan policies and actions including development impact fees (fire suppression facilities impact fees, police facilities impact fees), which offset costs associated with the expansion of public services. Therefore, there would be no public services impacts from the proposed zoning text amendment.

Warehouse Building and Facilities

5.15(a) (Fire Protection) Less than Significant Impact: The project site is served by the Rancho Adobe Fire Protection District (RAFPD). The District was formed in 1993 through the combining of two smaller districts, the Cotati Fire Protection District and the Penngrove Fire Protection District. The RAFPD provides services to the Penngrove, Cotati, and unincorporated areas of Petaluma. RAFPD covers an emergency response area of roughly 86 square miles and serves approximately 28,000 people. Service is provided by three stations located at 1 East Cotati Avenue; 11000 Main Street in Penngrove and 99 Liberty Road in Petaluma. Currently, there are 13 full-time Firefighters, Engineers and Captains; three Battalion Chiefs; 24 part-time Firefighters; one part-time Fire Chief; and one Administrative Manager. At the end of the first year of the merger between the two fire districts in 1993 the call volume was approximately 1,000 calls for service. In 2017, the RAFPD responded to over 2,750 calls for service, an increase of over 5 percent a year since 1993.[10]

The RAFPD has automatic aid agreements with neighboring districts, including the California Department of Forestry (CDF) and the City of Rohnert Park. The CDF provides automatic aid for emergency incidents in the west portions of the District and to State Responsibility Area fires. CDF provides fire response to anywhere in the District at the District's request. Under the automatic aid agreement between RAFPD and the City of Rohnert Park, the City of Rohnert Park responds to structure fires, water-flow alarm-sounding, vegetation fires, and vehicle collision calls in the RAFPD service area, including locations in Cotati.

The project site is located approximately 1 mile driving distance of the fire station located at 1 East Cotati Avenue.

As stated in **Section 5.14 Population and Housing**, the project is not anticipated to induce substantial unplanned growth in the area, either directly or indirectly. The increase in workers onsite will incrementally increase demands for fire services. New demands on fire service have been previously anticipated as part of

[10] Rancho Adobe Fire Protection District, https://www.rancho-adobe-fire.org/about-rancho-adobe-fire-protection-district, Accessed October 17, 2018.

General Plan buildout. As a standard condition of project approval, the applicant will be required to pay all applicable development impact fees. Therefore, impacts to fire protection services will be less than significant.

5.15(b) (Police Protection) Less than Significant Impact: The Cotati Police Department (CPD) is a 24-hour operation providing dispatch, patrol, traffic enforcement, investigation and community crime prevention. The CPD includes a chief, one lieutenant, two sergeants, six officers (a total of 10 officers), one police canine unit, one community services officer, five dispatchers, and one support services supervisor. As of 2018, the ratio of officers to population is approximately 1.27 per 1,000 persons.

Although the project will incrementally increase demands for police services, the project is not anticipated to induce a substantial increase in the demand for police protection services. New demands on police service have been anticipated as part of General Plan buildout. The General Plan includes policies and action to ensure that public services are provided at acceptable level and to ensure that development and growth does not outpace the provision of public services. As a standard condition of project approval, the applicant will be required to pay all development impact fees. Therefore, impacts to police protection services will be less than significant.

5.15(c) (Schools) No Impact: Students in the City of Cotati are served by the Cotati-Rohnert Park Unified School District (CRPUSD). The CRPUSD includes eight elementary schools, two middle schools, and two high schools. The proposed project involves the construction of a storage warehouse. Since the project includes no housing and will employee approximately 10 individuals, no impacts to schools are anticipated. This project would be required to pay applicable school impact fees.

5.15(d) (Parks) No Impact: The employees of the proposed warehouse are not expected to contribute to parkland use within the City. Employees may visit parks within the City of Cotati; however due to the few number of employees and the project's location no impacts are anticipated.

5.15(e) (Other Public Facilities) No Impact: The project will not result in substantial adverse impacts associated with any other public facilities. The project site is within the City limits and is well served by existing public services. The project will not generate a substantial increase in demands that warrant the expansion or construction of other new public facilities. The project would not impact the use of the proposed Class I bicycle path located along the north side of the Laguna de Santa Rosa. Therefore, no impacts related to other public facilities will occur.

Mitigation Measures: None Required.

5.16. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	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?	☐	☐	☐	☒

Sources: City of Cotati 2015 General Plan and General Plan EIR.

Recreation Setting:

The public parks and recreational opportunities within the City accommodate a range of uses and activities that include both active and passive recreation. Park land development and/or park acquisition impact fees are required to offset any potential impacts of the project on parks and open space.

Recreation Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.16(a-b) (Deterioration of Parks, Additional Recreational Facilities) No Impact: The proposed zoning text amendment would allow for future development applications to be received for storage warehouse facilities within the CI Zoning District. Under existing conditions, the CI Zoning District currently allows for a variety of similar types of uses including commercial/industrial facilities. Allowing SW uses, with a use permit, within the CI district would not adversely impact parks or require additional recreational facilities. Future development within the CI district would occur incrementally and would be subject to all General Plan policies and actions. Therefore, there would be no impacts to parks from the proposed zoning text amendment.

Warehouse Building and Facilities

5.16(a) (Deterioration of Parks) Less Than Significant Impact: The project site is located adjacent to the Laguna de Santa Rosa which includes an existing pathway on the north side.

The Laguna de Santa Rosa is within property owned by the Sonoma County Water Agency and the project does not include any proposal to modify the existing/proposed walking/bike path. Therefore, impacts due to substantial physical deterioration of this existing recreational facility would be less than significant.

5.16(b) (Additional Recreational Facilities) No Impact: This project does not include the provision of any new recreational facilities and does increase the demand for additional recreational facilities. Therefore, impacts will be less than significant.

Mitigation Measures: None Required.

5.17. TRANSPORTATION

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

Sources: City of Cotati 2015 General Plan; General Plan EIR; Traffic Impact Analysis, prepared by W-Trans, June 16, 2021; Cotati Bicycle and Pedestrian Master Plan, prepared by Sonoma County Transportation Authority, adopted December 2008, updated April 22, 2014; and Moving Forward 2040 Sonoma County's Comprehensive Transportation Plan, prepared by Sonoma County Transportation Authority,

September 2016.

Transportation Setting:

The project site is located at the west of Blodgett Streets which stubs into the east side of the project site. Blodgett Street is a fully improved City street with two travel lanes, parking and sidewalks. Blodgett Street was specifically constructed as a collector street to serve the existing industrial park. City and County plans do not include any policies specific to Blodgett Street.

Public Transit

Bus service in Cotati is provided by Sonoma County Transit, Golden Gate Transit, and Paratransit. Sonoma County Transit is the primary transit provider in Cotati; it provides regularly-scheduled fixed-route service to major activity centers and transit hubs within the City limits. Golden Gate Transit Routes 74, 80, and 101 serve Cotati with stops located at either the Hub or the St. Josephs Park and Ride. Paratransit, also known as dial-a-ride or door-to-door service, is available for those that are unable to independently use the transit system due to a physical or mental disability. The project site is not served by existing or proposed public transit routes.

Rail Service

Sonoma-Marin Area Rail Transit (SMART) offers passenger rail service in Sonoma and Marin counties. SMART's initial 43 miles of rail corridor includes 10 stations, from the Sonoma County Airport to Downtown San Rafael, and includes a station in Cotati. The full project will provide 70 miles of passenger rail service and a bicycle-pedestrian pathway.

Rail freight operation on the SMART rail corridor is overseen by the North Coast Railroad Authority. Freight service currently operates between Lombard (located in Napa County where the North Coast Railroad Authority interfaces with the national rail system) and Petaluma. Several round-trip freight trains per week are expected to pass through Cotati over the next several years as freight service expands.

Bike and Pedestrian Facilities

Existing and planned bicycle and pedestrian facilities in Cotati are shown in the Cotati Bicycle and Pedestrian Master Plan, adopted in December 2008 and updated April 2014. Notable facilities include a segment of the Laguna de Santa Rosa bike path between Commerce Boulevard (in Rohnert Park) and the southern City limits (with one small gap just south of East Cotati Avenue), and on-street bicycle lanes within the City limits on West Sierra Avenue and East Cotati Avenue.

According to the Cotati Bicycle and Pedestrian Master Plan, and as shown on Figure 2.2 of the General Plan, there is a proposed Class I bicycle/pedestrian path located along the north side of the Laguna de Santa Rosa across from the project site. As stated in Objective CI 2A of the General Plan, the City is striving to maintain and develop a network of sidewalks and pathways to provide for safe and convenient pedestrian travel. In particular, Policy CI 2.3 requires development projects to construct sidewalks and walkways on- and off-site in order to maintain consistency with the Cotati Bicycle and Pedestrian Master Plan, and as dictated by the location of transit stops and common pedestrian destinations.

Sonoma County Comprehensive Transportation Plan

Moving Forward 2040, Sonoma County's Comprehensive Transportation Plan (CTP), is a 25-year plan that serves as the vision for transportation throughout Sonoma County, with goals for the transportation system and the well-being of the communities. Moving Forward 2040 establishes five goals: maintain the existing public transportation system; relieve traffic congestion; meet targets to reduce greenhouse gas emissions in the

transportation sector; increase safety and emphasize health aspects of transportation planning strategies; and reduce travel time and cost and increase mobility in communities of concern. Major roadway projects identified in Moving Forward 2040 relative to Cotati include: updating the US 101 and Railroad Avenue Interchange; widening and rehabilitation of SR 116 between Sebastopol and Cotati; constructing sidewalks along west Cotati Avenue; US 101/SR 116 north bound on-ramp improvements; US 101/West Sierra Avenue south bound off-ramp improvements; and Old Redwood Highway pavement rehabilitation from La Plaza to Gravenstein Highway.

City Roadway and Intersection Impact Criteria

THRESHOLDS OF SIGNFICANCE-Since SB 743 introduces a new mandatory metric for use in transportation impact analysis, the City is required to determine what constitutes acceptable versus unacceptable levels of VMT for CEQA analysis. This process is generally referred to as establishing significance thresholds and is governed by CEQA Section 15064.7. Land use projects may also be screened out of further analysis if they are very small or can be demonstrated to primarily attract trips that would have otherwise been traveled at a longer distance. Additionally, certain projects that decrease vehicle miles traveled in the project area compared to existing conditions may be presumed to have a less than significant transportation impact.

Transportation Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.17(a-d) (Conflict with Program, Plan, Policy, Ordinance, CEQA Guidelines §15064.3(b), Design Feature Hazard, Emergency Access) Less Than Significant Impact: The proposed zoning text amendment would allow for future development applications to be received for storage warehouses facilities within the CI Zoning District. Under existing conditions, the CI Zoning District currently allows for a variety of similar types of uses including commercial/industrial facilities. Allowing SW uses, with a use permit, within the CI district is consistent with the General Plan and would not introduce any transportation conflicts. Storage-warehouses uses typically generate fewer daily trips than commercial/industrial uses due to the fewer number of employee. As such, allowing SW uses within the CI Zoning District will not generate a substantial increase in vehicle trips. Consistent with the General Plan, Action C1 1r, future development within the CI zoning district including SW type uses will be reviewed to ensure that new development facilitates walking, biking and transit nodes, new streets designed to maintain safe and efficient traffic flows, and constructs or contributes funds towards planned improvements. Therefore, impacts related to transportation would be less than significant.

Warehouse Building and Facilities

5.17(a) (Conflict with Program, Plan, Policy, Ordinance) Less than Significant Impact: Construction activities from development of the proposed project would temporarily generate a negligible amount of additional traffic along roadways in the vicinity of the project site caused by construction workers and material deliveries. The increase in vehicle trips during construction is considered minimal and local street capacity would not be significantly affected.

The storage-warehouse project includes the construction of a new cu-de-sac at the west terminus of Blodgett Street. The cu-de-sac will be located on the project site and will be dedicated as public right-of-way and will include a public sidewalk. The project will be served by two access driveways extending from the new cul-de-sac. The project includes 45 on-site vehicle parking spaces and 6 bicycle parking spaces. There is no aspect of the project that would preclude the completion of a Class 1 Bike Path along the north side of the Laguna de Santa Rosa. Therefore, impacts to transit, bicycle and pedestrian facilities will be less than significant.

W-Trans prepared a traffic impact analysis to evaluate the potential transportation impacts for the proposed project (**Appendix G**). The W-Trans report concluded that the project is expected to generate an average of 87 trips per day, including 9 morning peak hour trips and 10 trips during the p.m. peak hours. Based upon the small

number of trips expected to be generated by the project W-Trans concluded it would have an imperceptible effect on traffic and further analysis is therefore unwarranted.

5.17(b) (Conflict with CEQA Guidelines §15064.3(b)) Less Than Significant Impact: The City of Cotati adopted thresholds of significance for vehicle miles traveled (VMT) on September 22, 2020. Guidance provided in the document recommends the use of screening thresholds to quickly identify when a project should be expected to cause a less-than-significant impact in terms of VMT without conducting a detailed study. As the proposed storage-warehouse is projected to only generate 87 daily trips, the project qualifies as a small infill project (fewer than 110 trips per day) and is assumed to be less-than-significant.

5.17(c) (Design Feature Hazard) Less Than Significant Impact: The W-Trans Traffic Report concluded that cul-de-sacs are typically free of obstructions which may hinder sight distances and vehicle operating speeds with cul-de-sacs are normally 20 mph or less. Based upon this assessment, it is expected that the sight distance at the project driveways would be adequate if parking is prohibited within the cul-de-sac and adjacent vegetation is properly trimmed. There are no design feature hazards that would be introduced by the project or proposed offsite frontage improvements. Therefore, impacts due to the project introducing a hazardous design feature would be considered less than significant.

5.17(d) (Emergency Access) Less Than Significant Impact: The minimal increase of construction vehicles traveling to and from the project site on a temporary basis would not result in inadequate emergency access. In order to construct the project, road closure is not anticipated. The project's internal circulation plan has been reviewed and meets all requirements of the Cotati Public Works & Utilities and Fire Departments. Site circulation was determined to be adequate, including sufficient street widths to allow for fire truck turn around and sufficient access to the proposed buildings. Therefore, emergency vehicle access is adequate and potential impacts will be less than significant.

Mitigation Measures: None Required.

5.18. TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Sources: City of Cotati General Plan; General Plan EIR; and Cultural Resources Study, prepared by Scott McGaughey Anthropological Studies Center Sonoma State University, June, 2021.

Tribal Cultural Resources Setting:

According to Public Resources Code (PRC) Section 21074, a resource is a tribal cultural resource if it is either:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    a. Included or determined to be eligible for inclusion in the California Register of Historical Resources; or
    b. Included in a local register of historical resources as defined in PRC Section 5020.1(k).
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). In applying the criteria set forth in PRC Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.
3. A cultural landscape that meets the criteria of PRC Section 21074(a) to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
4. A historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in PRC Section 21083.2(g), or a "non-unique archaeological resource" as defined in PRC Section 21083.2(h), if it conforms with the criteria of PRC Section 21074(a).

Tribal Cultural Resources Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.18(a.i – a.ii) (Listed or Eligible for Listing, Significant Resource) Less Than Significant Impact: Under existing conditions, the CI Zoning District currently allows for a variety of similar types of uses including commercial/industrial facilities. Allowing SW uses, with a use permit, within the CI district would not adversely impact tribal cultural resources. As the proposed zoning text amendment is limited to allowing CW within the CI zoning district where other urban type development is already allowed, there would be no additional impacts to tribal cultural resources relative to existing conditions. Therefore, impacts related to tribal cultural resources would be less than significant from the proposed zoning text amendment.

Warehouse Building and Facilities

AGENCY AND TRIBAL COMMUNICATION: ASC contacted the Native American Heritage Commission (NAHC) on June, 7 2021, requesting a review of the Sacred Lands File for information on Native American cultural resources in the Project Area. On June 17, 2021 the NAHC completed a record search for the project site and the results did not indicate the presence of a Native American Sacred Site. On June 17, 2021, the NAHC responded with a list of groups and individuals who may be able to provide information on cultural resources in the Project Area. On June 18, 2021, Scott McGaughey sent letters to the listed individuals requesting additional information. No responses have been received as of August 5, 2021.

In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the Federated Indians of Graton Rancheria (FIGR) on March 1, 2021, which included a brief description of the proposed project and its location, the City of Cotati's contact information, and a notification that the Federated Indians of Graton Rancheria has 30 days to request consultation. City of Cotati did not receive a response requesting consultation under PRC Section 21080.3.1(b)(2) from the Federated Indians of Graton Rancheria.

As of August 5, 2021, no information has been received from the NAHC or the people on the list of contacts provided by the NAHC that suggests the presence of cultural resources in the Project Area.

5.18(a.i) (Listed or Eligible for Listing) No Impact: As stated above, a search of the Sacred Lands file was conducted and did not indicate the presence of a Native American Sacred Site within or in the immediate vicinity of the project site. Therefore, the project would have no impact on a tribal cultural resource that is 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).

5.18(a.ii) (Significant Resource) Less Than Significant Impact with Mitigation: The City of Cotati has not identified any tribal cultural resources and there are no known concerns associated with the proposed project impacting tribal cultural resources. The City of Cotati did not receive a response requesting consultation under PRC Section 21080.3.1(b)(2) from the Federated Indians of Graton Rancheria.

Although no Tribal Cultural resources were encountered during the cultural resources field survey conducted onsite, there remains to be a potential that tribal cultural resources may be identified during site development. As such, development within the project site has the potential to result in impacts to Tribal Cultural resources. Mitigation set forth under the Cultural Resources discussion above, provides protection of cultural resources, including Tribal Cultural Resources, in the event of accidental discovery. Therefore, the proposed project would have less than significant impacts on Tribal Cultural Resources.

Mitigation Measures: Cul-1 and Cul-2 above.

5.19. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local	☐	☐	☒	☐

infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Sources: City of Cotati 2015 General Plan; General Plan EIR; Sonoma County Water Agency 2015 Urban Water Management Plan, prepared by Brown and Caldwell, June 2016; Santa Rosa Sanitary Sewer System Master Plan Update, prepared by Arcadis, October 2014; Cotati 2010 Urban Water Management Plan, prepared by Carollo Engineers, August 2011; and City of Santa Rosa Incremental Recycled Water Program, August 2007 Update to the Recycled Water Master Plan, prepared by Winzler & Kelly, July 2007.

Utilities and Service Systems Setting:

The City of Cotati collects impact and/or service fees for wastewater storm drain and other utilities and service systems. The one-time impact fees are charged to offset the cost of improving or expanding city facilities in order to accommodate new private development. The fees are utilized to fund the construction or expansion related to capital improvements necessitated by cumulative growth citywide.

The project site is located within the City limits and the area is currently served by existing utilities and service systems. New service connections will be installed that tie into existing facilities located within Blodgett Street. The connection of new services is not expected to require substantial infrastructure improvements to adequately serve the proposed project.

Water Supplies

The Cotati Department of Public Works and Engineering, Water Division, serves as the potable water purveyor for the City of Cotati. The City of Cotati sources approximately 67 percent[11] of its water supply from the Sonoma County Water Agency (SCWA) that is conveyed from the Russian River to the City via the 48-inch Cotati Intertie Aqueduct located in East Cotati Avenue. Within the City, the SCWA maintains three above-ground storage tanks with a total capacity of 36 million gallons. The balance of the City's water supply is served by three municipal groundwater wells owned and operated by the City. The groundwater wells also serve as the contingency supply to supplement water needs during peak periods and periods of drought.

The SCWA adopted its 2015 UWMP in June 2016. Currently, four water rights permits issued by the SWRCB authorize the SCWA to store up to 122,500 afy of water in Lake Mendocino and up to 245,000 afy of water in Lake Sonoma, and to divert up to 180 cubic feet per second (cfs) of water from the Russian River with a limit of 75,000 afy.[12] The permits also establish minimum instream flow requirements for fish and wildlife protection and recreation. Based on the water demand projections described in 2015 UWMP, SCWA estimates that its total annual diversions and re-diversions of Russian River water may exceed the 75,000 afy limit by about 117 afy in 2035 and by about 988 afy in 2040. If the trends in these projections continue, then it may be necessary for SCWA to make the necessary filings with the SWRCB in approximately 2030, so that SCWA will be authorized to divert and re-divert more than 75,000 afy in 2035.

The SCWA also maintains three groundwater wells in the Santa Rosa Plain Groundwater Sub-basin, with a total capacity of approximately 2,300 acre-feet per year (afy), which is used on an as-needed basis during periods of

[11] City of Cotati 2017 Water Quality Report, http://www.cotaticity.org/UserFiles/Servers/Server_9669113/File/2017%20Water%20Quality%20Report.pdf, Accessed October 17, 2018.

[12] Sonoma County Water Agency 2015 Urban Water Management Plan, prepared by Brown and Caldwell, June 2016.

drought or when Russian River supplies are otherwise constrained. Annual production from the three wells has ranged from 172 to 1,271 afy between 2011 to 2015, with an average of 643 afy.[13]

According to the SCWA 2015 UWMP, the water agency provided 43,145 af in 2015 to its contractors and customers. The SCWA supplied 479 af to the City of Cotati, which represented approximately 1.1 percent of the total water supplied by SCWA in 2015. The SCWA projects to supply approximately 73,045 af to its contractors and customers in 2035. The City of Cotati is projected to receive 960 af, which represents approximately 1.3 percent of the total water to be supplied by SCWA in 2035.

Under the existing water supply agreement with SCWA, the City of Cotati has a maximum entitlement of 1,520 afy; this agreement remains in effect until January 30, 2040. The balance of the City's water supply is served by three municipal groundwater wells owned and operated by the City. The groundwater wells also serve as the contingency supply to supplement water needs during peak periods and periods of drought.

The California Water Code requires that urban water suppliers servicing 3,000 or more connections, or supplying more than 3,000 af of water annually, prepare an Urban Water Management Plan (UWMP) in accordance with the Urban Water Management Planning Act. The City of Cotati supplied 803 af of potable water to approximately 2,573 customers in 2010, and therefore was not legally required to develop an UWMP. However, the City did prepare an UWMP with the intention of taking a proactive approach to water supply planning and to promote the efficient use of water. Wastewater Treatment

The City of Cotati owns and operates a wastewater collection system that services approximately 1,200 acres. The Sanitary Sewer system is composed of four lift stations, 140,300 linear feet of collection piping that ranges in size from six to twenty-four inches, 484 manholes, 150 cleanouts and a 24-inch transfer interceptor which conveys wastewater to the Laguna Wastewater Treatment Plant (WTP) in Santa Rosa.

The Laguna WTP treats all wastewater generated by residential, commercial and industrial uses within the City of Santa Rosa, Rohnert Park, Cotati, Sebastopol and the South Park Sanitation District. The water recycling facility produces tertiary recycled water in compliance with the California Department of Health Services. At present, treatment capacity is at approximately 24 mgd.[14] An Incremental Recycled Water Program (IRWP) has been approved and will be implemented as growth occurs. The City of Santa Rosa IRWP, August 2007 Update to the Recycled Water Master Plan, estimates that in 2020, total average dry weather flow (ADWF) to the Laguna WTP will be approximately 25.89 mgd.[15]

As of 2014, the Laguna WTP receives approximately 15 mgd from the City of Santa Rosa, 3.3 mgd from the City of Rohnert Park, 0.7 mgd from the City of Sebastopol, and 0.5 mgd from the City of Cotati, for a total of approximately 19.5 mgd. [16] Wastewater generated by the City of Cotati is conveyed directly to the Laguna WTP via the City's Hellman Lane 24-inch trunk line. The wastewater generated by the City of Cotati represents less than 3 percent of the total wastewater treated at the Laguna WTP. Treated water from the Laguna WTP is either discharged into the Russian River via the Laguna de Santa Rosa or recycled for one or more of the following: agricultural irrigation, supply water for wetlands, urban irrigation or for Geyser recharge.

[13] Ibid.

[14] Santa Rosa Sanitary Sewer System Master Plan Update, prepared by Arcadis, October 2014.

[15] City of Santa Rosa Incremental Recycled Water Program, August 2007 Update to the Recycled Water Master Plan, prepared by Winzler & Kelly, July 2007.

[16] Santa Rosa Sanitary Sewer System Master Plan Update, prepared by Arcadis, October 2014.

Storm Drains

Within the City of Cotati storm drains convey runoff from impervious surfaces such as streets, sidewalks and buildings to gutters that primarily drain to Copeland Creek, Cotati Creek and/or Washoe Creek and ultimately to the Russian River. The stormwater runoff is untreated and carries with it any contaminants picked up along the way such as solvents, oils, fuels and sediments. In accordance with NPDES permitting requirements, the City has developed a Storm Water Management Plan (SWMP) which establishes standard requirements and controls related to the City's storm drain system. All existing and proposed development must adhere to the city's SWMP.

Solid Waste

Solid Waste management in Cotati is overseen by the Sonoma County Waste Management Agency, a Joint powers authority for the nine cities and County of Sonoma. The City contracts with Recology for solid waste disposal and recycling services. This company provides canisters for garbage, green (plant waste) materials, and recycling. Solid waste is collected and transferred to the Sonoma County landfill sites.

Utilities and Service Systems Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.19(a-e) (Exceed Water, Wastewater Treatment, Storm Water and/or Solid Waste Disposal Requirements) Less Than Significant Impact: Allowing SW uses, with a use permit, within the CI district would not adversely impact utilities or service systems. As with all development applications received by the City, and through the Use Permit process for SW uses, the City of Cotati assesses capacity and infrastructure needs to serve proposed development and are subject to General Plan policies including those that require water, wastewater and solid waste management practices. As the proposed zoning text amendment is limited to allowing SW within the CI zoning district where other urban type development is already allowed, there would be no additional impacts to utilities and service systems relative to existing conditions. Therefore, impacts related to utilities would be less than significant from the proposed zoning text amendment.

Warehouse Building and Facilities

5.19(a) (Relocation/Expansion of Utilities) Less Than Significant Impact: The project site can served by existing utilities located underground located at the west end of Blodgett Street. The project will not require or result in the relocation or expansion of offsite utilities. Existing water, wastewater, electric power, natural gas, and telecommunications facilities extend to the project site and have sufficient capacity to serve the proposed development. The project will not result in significant environmental impacts due to the expansion of storm water drainage facilities or construction of new facilities as improvements are limited to activities onsite and along the site frontage. Development of the proposed project will increase the amount of impervious surfaces relative to existing conditions. In order to offset the increase in stormwater runoff flows, storm drains would be utilized throughout the project site to direct stormwater from impervious areas to landscaped areas with a detention basin, and other vegetated bio-retention features consistent with the requirements of Low Impact Development (LID). Stormwater runoff would then either discharge to the existing storm drain network along Blodgett Street. Therefore, the project is expected to result in less than significant impacts due to the relocation or expansion of utilities including stormwater infrastructure.

5.19(b) (Sufficient Water Supplies) Less Than Significant Impact: The project will utilize water obtained from the City's municipal water system to meet onsite potable water demands. The water demand resulting from the proposed project will increase relative to existing uses.

The 2013 General Plan EIR estimates total water demand at buildout (2035) to be 1,552 afy within the City limits and 1,757 afy within the Planning Area. As described in the General Plan EIR, the projected water supply available to the City of Cotati in 2035 is 2,076 afy and consists of water from SCWA (1,246 afy), groundwater

(530 afy), recycled water (32 afy) and future water conservation (268 afy). As such, the water supply available to the City exceeds the projected water demand associated with full buildout of the General Plan, including the proposed project.

The project is required to adhere to the Water Conservation Ordinance, Chapter 13.30.060 and will install ultra-low water use plumbing fixtures and appliances and water efficient landscaping that features drought tolerant plant varieties. The inclusion of a water efficient plant pallet in the landscaping design will ensure that water demands are minimized for landscaping purposes. Applicable City water fees will be collected from the applicant in order to fund the applicant's share for use of existing facilities and planned improvements. Therefore, there are sufficient water supplies to serve the project and impacts would be less than significant.

5.19(c) (Sufficient Wastewater Treatment Capacity) Less Than Significant Impact: Wastewater generated by the project is consistent with the service needs anticipated by the Cotati 2015 General Plan and will not require the expansion of treatment facilities or the construction of new facilities. Wastewater flows from the proposed project will be conveyed to the Laguna WTP, which has sufficient operating capacity to handle the additional flows generated by the proposed project. The project is not expected to exceed wastewater treatment requirements set forth by the Regional Water Quality Control Board, nor necessitate the expansion or construction of wastewater treatment facilities. The project does not propose any industrial uses that would generate wastewater requiring special treatment nor would effluent contain constituents exceeding applicable standards. City Wastewater capacity fees will be collected from the applicant in order to fund the applicant's share for use of existing facilities and planned improvements. Therefore, the project would not exceed wastewater treatment requirements and impacts would be less than significant.

As stated in the 2015 General Plan EIR, Cotati's capacity allocation under the 2002 Fourth Amendment to the Subregional Partnership with the City of Santa Rosa was 0.76 mgd. In order to meet projected flows under cumulative General Plan buildout conditions, the City's allocation needs to be increased to at least 0.83 mgd.

The City of Santa Rosa IRWP, August 2007 Update to the Recycled Water Master Plan, estimates that in 2020, total ADWF to the Laguna WTP will be approximately 25.89 mgd, which exceeds the current NPDES permit capacity of the plant. While the City of Cotati is projected to contribute approximately 3.2% of the wastewater treated at the Laguna WTP, under 2035 buildout conditions, the existing permitted capacity of the Plant would be exceeded.

Implementation of the policies and actions identified in the General Plan would assist in ensuring that adequate treatment plant capacity and permitted capacity is available to meet 2035 buildout conditions, including wastewater demands generated by the City of Cotati and the rest of the Regional Partners. However, as stated in the General Plan EIR, an increase in permitted capacity cannot be guaranteed and the impact was considered cumulatively considerable and significant and unavoidable.

2015 Cotati General Plan Policy CSF 2.16, and Actions 2l and 2m (identified below) would reduce this impact to the greatest degree feasible, but not to a less than significant or less than cumulatively considerable level. As a result, the City of Cotati adopted a statement of overriding considerations regarding the potential to exceed wastewater treatment capacity or the requirements of the RWQCB.

Policy CSF 2.16: Work with the Santa Rosa Subregional Wastewater System and neighboring cities to assist in the maintenance of an adequate sewage treatment and disposal system for the region.

Action CSF 2l: Continue to monitor wastewater flow generation rates within the City's service area and apply to the subregional partners for an incremental increase in wastewater flow allocation to meet projected demand prior to any exceedance of the City's wastewater flow allocation under the Subregional Partnership.

Action CSF 2m: Coordinate with the Laguna Wastewater Treatment Plant to increase the National Pollutant Discharge Elimination System (NPDES) permit capacity of the plant to meet projected 2035 demand for all sources of wastewater treated at the plant.

The proposed project would generate wastewater flows that would contribute to the cumulative impacts to wastewater treatment under buildout conditions. As previously stated, the City has adopted a statement of overriding conditions for the potential to exceed wastewater treatment capacity or the requirements of the RWQCB. Applicable Wastewater Capacity fees will be collected from the applicant in order to fund the applicant's share for use of existing facilities and planned improvements. Further, the project will implement all CalGreen Tier 1 building requirements which include indoor water efficiency standard, thereby ensuring that wastewater volumes are minimized. Therefore, the project will have less than significant impacts related to the adequacy or capacity of wastewater treatment facilities.

5.19 (d, e) (Solid Waste Generation/Compliance with Solid Waste Management) Less Than Significant Impact. During construction and operation, the project will generate solid waste, however, it is not expected to exceed landfill capacity and is not expected to result in violations of federal, state, or local statutes and regulations related to solid waste. Therefore, implementation of the project will result in less than significant impacts to the local landfill's permitted capacity for solid waste disposal, as well as federal, state, and local statutes and regulations.

Mitigation Measures: None Required.

5.20. WILDFIRE

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Sources:

Wildfire Setting:

The City of Cotati is susceptible to wildland fires due to moderate fuel loads within the Sphere of Influence and on undeveloped parcels within the UGB that contain grasslands. Global climatic conditions such as increased heat, prolonged periods of drought and extreme weather also contribute to wildfire risks. The areas most susceptible to fire hazards are located west and east of City limits; these areas are designated as "Moderate and High Fire Hazard Severity Zone" within a Local Responsible Area by CAL FIRE.

In October 2017, the Tubbs Fire (Central LNU Complex) burned approximately 36,807 acres in the northern and eastern portions of the City of Santa Rosa. Residents were exposed to direct effects of the wildfire, such as the loss of a structure, and to the secondary effects of the wildfire, such as smoke and air pollution. Smoke generated by wildfire consists of visible and invisible emissions that contain particulate matter (soot, tar, water vapor, and minerals) and gases (carbon monoxide, carbon dioxide, nitrogen oxides). Public health impacts associated with wildfire include difficulty in breathing, odor, and reduction in visibility.

The project site is located within the City's UGB and surrounded by roadways and developed and undeveloped lands.

Wildfire Impact Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.20 (a-d) (Impair Emergency Plan, Expose Occupants to Wildfire Pollutants, Require Infrastructure, Pose Wildfire Related Risks) No Impact: The proposed zoning text amendment would allow for future development applications to be received for storage-warehouse facilities within the CI Zoning District. Under existing conditions, the CI Zoning District currently allows for a variety of similar types of uses including commercial/industrial uses. Allowing SW uses, with a use permit, within the CI district is consistent with the General Plan and would not introduce any conflicts with emergency plans no pose wildfire related risks as the CI zoning district is not located within or near high fire hazard zones. Therefore, there would be no impacts from the proposed zoning text amendment.

Warehouse Building and Facilities

5.20(a) (Impair Emergency Plans) Less Than Significant Impact: The project site is categorized as a Non-VHFHZ by CAL FIRE. Therefore, the proposed project is not expected to substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

5.20(b-d) (Wildfire Risk Exacerbation, Infrastructure Contributing to Wildfire Risk, Exposure to Wildfire-Related Risks) Less Than Significant Impact: The project site is relatively flat and surrounded by lands that are mostly developed with urban uses. New structures introduced onsite would be built according to the latest California Building Code, which requires fire resistant standards for building materials, systems, and assemblies used in the exterior design and construction of new buildings. There are no factors, such as steep slopes, prevailing winds, or the installation/maintenance of new infrastructure, that would exacerbate fire risk or expose project occupants to the uncontrolled spread of a wildfire, pollutant concentrations from a wildfire, post-fire slope instability, or post-fire flooding. Therefore, impacts would be less than significant.

***Mitigation Measures*:** None Required.

5.21. MANDATORY FINDINGS OF SIGNIFICANCE CAL. PUB. RES. CODE §15065)

A focused or full environmental impact report for a project may be required where the project has a significant effect on the environment in any of the following conditions:

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Mandatory Findings Discussion:

Zoning Amendment to Allow SW within CI Zoning District

5.16(a-c) (Degrade the Environment, Cumulatively Affect, Substantial Adverse Effect on Humans) Less Than Significant Impact: The proposed zoning text amendment to allow SW within the CI zoning district would not result in degradation to the quality of the environment, cumulative impacts nor substantial adverse effect on human beings. Future development proposals within the CI zoning district, including storage-warehouse facilities, would be subject to General Plan policies including those that ensure protection of nature resources, human health and safety. Pursuant to the City's General Plan and zoning, similar types of uses such as commercial/industrial uses are currently allowed uses within the CI zoning district and introducing the new storage-warehouse use type will not result in any new or more severe environmental impacts. Therefore, impacts from the proposed zoning text amendment to allow SW within the CI zoning district would be less than significant.

Warehouse Building and Facilities

5.20(a) (Degrade the Environment): Less Than Significant Impact: The project is located within the City limits and consistent with the General Plan Land Use designation for the site, including its goals, objectives, policies and actions of the City of Cotati. With implementation of mitigation measures set forth above under

Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, and Noise, the project's potential impacts would be reduced to levels below significance. As such, the project will not degrade the quality of the environment, reduce habitat, or adversely affect cultural resources. Therefore, the project will have less than significant impacts due to degradation of the environment.

5.20(b) (Cumulatively Affect the Environment) Less Than Significant Impact with Mitigation: The CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or increase in environmental impacts. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the proposed project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (Guidelines, Section 15355(a)(b)).

The analysis of cumulative impacts for each environmental factor can employ one of two methods to establish the effects of other past, current, and probable future projects. A lead agency may select a list of projects, including those outside the control of the agency, or, alternatively, a summary of projections. These projections may be from an adopted general plan or related planning document, or from a prior environmental document that has been adopted or certified, and these documents may describe or evaluate the regional or area-wide conditions contributing to the cumulative impact.

This Initial Study evaluates cumulative impacts relative to buildout conditions anticipated by the City of Cotati's General Plan and as analyzed in the General Plan EIR. The project has the potential to incrementally contribute in the following cumulative impacts identified and analyzed in the General Plan EIR:

> **Traffic (General Plan EIR Impacts 3.12-1, 3.12-2, 3.12-3, 4.13):** The project would contribute vehicle trips to existing streets and highways. The project is subject to a traffic impact fees for the installation of planned future improvement city-wide. The project would contribute funding to assist the City of Cotati in implementing planned future roadway improvements required under buildout of the General Plan. The project will also complete Blodgett Street by constructing a cul-de-sac at the west terminus. Therefore, the project's contribution to cumulatively considerable traffic impacts would be less than significant.
>
> **Noise (General Plan EIR Impacts 3.10-1, 3.10-7, and 4.11):** The project will increase vehicle trips on local roadways and, in doing so, incrementally contribute to noise levels determined by the General Plan to be significant at build-out. However, its incremental contribution of vehicular trips is insufficient to result in a perceptible change in noise level. Therefore, the project's contribution to this potentially significant cumulative impact would not be considerable.
>
> **Utilities (General Plan EIR Impacts 3.13-3 and 4.14):** The project will result in an increased wastewater flows that would contribute to the cumulative potential to exceed wastewater treatment capacity or the requirements of the RWQCB. However, as stated in the analysis above, applicable wastewater capacity fees will be collected from the applicant to fund the applicant's share for use of existing facilities and planned improvements. Public utility and service providers will be capable of serving the project with existing or planned facilities. Therefore, the project's contribution to this potentially significant cumulative impact would not be considerable.

The project implements City's General Plan by introducing a storage-warehouse use within City limits on a site that has been identified for urban type uses. The project is located in an area developed with similar uses. Potential cumulative environmental impacts are expected to remain at, or be mitigated to, levels below significance, and long-term environmental goals are not expected to be adversely impacted by the project. The

Project does not increase the severity of any of the impacts from the levels identified and analyzed in the General Plan, and development of the project site is proposed with uses consistent with those set forth in the General Plan EIR. Therefore, the project's cumulative impacts will be reduced to less than significant levels.

5.20(c) (Substantial Adverse Effect on Humans) Less Than Significant Impact: As reflected in the analysis above for each environmental topic, the project does not have the potential to result in substantial adverse impacts to humans. With mitigation measures set forth above, environmental effect that would directly or indirectly impact human beings onsite or in the project vicinity will be reduced to less than significant levels. Therefore, the project will have less than significant impacts due to substantial adverse environmental effects.

6. REFERENCE DOCUMENTS

The following information sources were referenced in the preparation of this Initial Study/Mitigated Negative Declaration and are available for review online or at the City of Cotati Planning counter during normal business hours. Questions or requests to review any of the technical appendices listed below may be directed to the project planner, Joel Galbraith, at planner@cotaticity.org.

6.1. TECHNICAL APPENDICES

A. Project Plans dated May 24, 2021

B. *Evaluation of Air Quality and Greenhouse Gas Assessment* prepared by Illingworth & Rodkin, June 21, 2021.

C. *Biological Resource* Report*,* prepared by Dana Riggs, February 16, 2021.

D. *Archaeological/Cultural Resources Study* prepared by Scott McGaughey, Sonoma State University, June, 2021.

E. *Geotechnical/Soil Feasibility Evaluation,* prepared by Reese and Associates, March 26, 2021.

F. *Initial Storm Water Low Impact Development Report and Preliminary Hydraulics and Hydrology Report* prepared by Calichi Design, March 11, 2021.

G. *Traffic Study*, prepared by W-Trans, June 16, 2021.

H. *Acoustics, Noise and Vibration* prepared by Wilson IHRIG, dated February 11, 2021.

6.2. OTHER DOCUMENTS REFERENCED

1. *2015 Traffic Volumes on California State Highways*, http://www.dot.ca.gov/trafficops/census/docs/2015_aadt_volumes.pdf, accessed September 28, 2017.

2. *BAAQMD 2017 Bay Area Clean Air Plan*, prepared by the Bay Area Air Quality Management District, April 2017.

3. *BAAQMD Roadway Screening Analysis Calculator*, http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools, accessed September 28, 2017.

4. *California Environmental Quality Act Air Quality Guidelines*, prepared by the Bay Area Air Quality Management District, May 2011.

5. *California Department of Conservation Farmland Mapping and Monitoring Program*.

6. *California Department of Conservation*, Sonoma County Tsunami Inundation USGS 24K Quads, http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/Sonoma, Accessed August 18, 2017.

7. *California Regional Conservation Plans Map*, prepared by CDFW, July 2017. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed August 4, 2017.

8. *California Scenic Highway Mapping System*, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, Accessed September 15, 2019.

9. *City of Cotati 2010 Urban Water Management Plan*, prepared by Carollo Engineers, August 2011.

10. *Public Draft Environmental Impact Report for the 2013 Cotati General Plan Update* (SCH #2013082037), September 2014.

11. *Findings of Fact and Statement of Overriding Considerations for the 2013 Cotati General Plan Update*, November 2014.

12. *City of Cotati General Plan*, prepared March 23, 2015.

13. *City of Cotati Housing Element*, adopted May 19, 2015.

14. *City of Cotati Bicycle and Pedestrian Master Plan*, prepared by Sonoma County Transportation Authority, adopted December 2008, updated April 22, 2014.

15. *City of Santa Rosa Incremental Recycled Water Program, August 2007 Update to the Recycled Water Master Plan*, prepared by Winzler & Kelly, July 2007.

16. *Climate Action 2020 and Beyond,* prepared by Sonoma County Regional Climate Action Plan, July 2016.

17. *Cotati-Rohnert Park Unified School District*, Monthly Enrollment as of August 31, 2017, presented to Board of Trustees on September 15, 2017.

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7. MITIGATION MONITORING AND REPORTING PROGRAM