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DRAFT
Canine Companions Canine Early Development Center Expansion
Initial Study/Mitigated Negative Declaration
City of Santa Rosa, Sonoma County, California

Prepared for:
City of Santa Rosa
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Report Date: August 10, 2021

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List of Exhibits

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ACRONYMS AND ABBREVIATIONS

µg/m^3	micrograms per cubic meter
°F	degrees Fahrenheit
°C	degrees Celsius (Centigrade)
AAF	age-specific adjustment factor
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AEP	Association of Environmental Professionals
AFY	acre-feet per year
APN	Assessor's Parcel Number
AQP	Air Quality Plan
ARB	California Air Resources Board
ASF	age sensitivity factor
AT	averaging time
BAAQMD	Bay Area Air Quality Management District
BERD	California Built Environment Resource Directory
BGS	below ground surface
BMP	Best Management Practice
BRA	Biological Resources Assessment
CA-MUTCD	California Manual on Uniform Traffic Control Devices
Cal/EPA	California Environmental Protection Agency
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CBC	California Building Standards Code
CCI	Canine Companions for Independence
CDF	California Department of Finance
CDFW	California Department of Fish and Wildlife
CEDC	Canine Early Development Center

CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNPSEI	California Native Plant Society Electronic Survey
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPF	cancer potency factor
CRHR	California Register of Historical Resources
CRLF	California red-legged frog
CTS	California tiger salamander
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DBH	diameter at breast height
DBR	daily breathing rate
DPM	diesel particulate matter
DPR	California Department of Parks and Recreation
DPS	Distinct Population Segment
DU	dwelling unit
DU/acre	dwelling unit per acre
DWR	California Department of Water Resources
ED	Exposure Duration
EF	Exposure Frequency
EI	Expansion Index
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas

GIS	Geographic Information System
GPCD	gallons per capita per day
GPD	gallons per day
HRA	Health Risk Assessment
HRE	Historic Resources Evaluation
in/sec	inch per second
IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
kBTU	kilo-British Thermal Unit
kWh	kilowatt-hour
L_{dn}	day/night average sound level
L_{eq}	equivalent continuous sound level
L_{max}	maximum noise/sound level
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
L_{max}	maximum instantaneous noise level
LOS	Level of Service
LRA	Local Responsibility Area
M&A	Monk & Associates
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MIR	Maximum Impacted Sensitive Receptor
MLD	Most Likely Descendant
MM	Mitigation Measure
mph	miles per hour
MS4	Municipal Separate Storm Sewer System
MSA	Metropolitan Statistical Area
MSL	mean sea level
MT	metric tons
MUP	Minor Conditional Use Permit
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_2	nitrogen dioxide
NO_X	oxides of nitrogen
NPDES	National Pollution Discharge Elimination System
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places

NWIC	Northwest Information Center
OEHHA	California Office of Environmental Health Hazards Assessment
OHP	California Office of Historic Preservation
OPR	Governor's Office of Planning and Research
PBO	Programmatic Biological Opinion
PD	Planned Development
PG&E	Pacific Gas and Electric Company
PM_{10}	particulate matter, including dust, 10 micrometers or less in diameter
$PM_{2.5}$	particulate matter, including dust, 2.5 micrometers or less in diameter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
REF	residential equivalency factors
REL	Reference Exposure Level
RHNA	Regional Housing Needs Assessment
rms	root mean square
ROG	reactive organic gases
RPS	renewables portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCTA	Sonoma County Transportation Authority
Sonoma Water	Sonoma County Water Agency
SMARA	California Surface Mining and Reclamation Act
SO_2	sulfur dioxide
SO_X	sulfur oxide
SR	State Route
SRA	State Responsibility Area
SRFD	Santa Rosa Fire Department
SRPD	Santa Rosa Police Department
State Water Board	California State Water Resources Control Board
SUSMP	Standard Urban Storm Water Mitigation Plan
SWITRS	Statewide Integrated Traffic Records System
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TAH	time at home factor
TCR	Tribal Cultural Resource
TIS	Traffic Impact Study

UCMP	University of California Museum of Paleontology
UGB	Urban Growth Boundary
USACE	United States Army Corp of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
VOC	volatile organic compound
WBWG	Western Bat Working Group
WELO	Water Efficient Landscape Ordinance
WMMP	Wetland Mitigation and Monitoring Plan
WUI	wildland urban interface
WWTP	Wastewater Treatment Plant

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SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) is to identify any potential environmental impacts that would result from implementation of the Canine Companions Canine Early Development Center Project (proposed project) in the City of Santa Rosa, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Santa Rosa has discretionary authority over the proposed project and is the Lead Agency in the preparation of this Draft IS/MND and any additional environmental documentation required for the proposed project. The intended use of this document is to determine the level of environmental analysis required to adequately analyze the proposed project pursuant to the requirements of CEQA and to provide the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the project location and the primary project characteristics. Section 2 includes an environmental checklist that provides an overview of the potential impacts that may result from project implementation, elaborates on the information contained in the environmental checklist, and provides justification for each checklist response. Section 3 contains the List of Preparers.

1.2 - Project Location

The project site is located at 2965 Dutton Avenue in the southwestern portion of the City of Santa Rosa, in Sonoma County, California (Exhibit 1). The project site is bound by Colgan Creek and storage and light industrial uses (west), unimproved County-owned fields (north), commercial and light industrial uses and low-density residential homes (northeast), commercial and industrial uses (east), commercial and industrial uses (south), and low-density residential homes (southwest) (Exhibit 2). The 2.98-acre project site consists of Assessor's Parcel Number (APN) 043-135-031. Specifically, the project site is located on the *Santa Rosa, California* United States Geological Survey (USGS) 7.5-minute Topographical Quadrangle Map, Land Grant: Cabeza De Santa Rosa and Llano De Santa Rosa (Approximately Latitude 38° North 24' 26.4" and Longitude 122° West 43' 28.4").

1.3 - Environmental Setting

The project site consists of undeveloped land directly north of the existing driveway to the Canine Companions for Independence Headquarters. Colgan Creek, a flood control channel, borders the site to the west; the creek flows into the Laguna de Santa Rosa, 4 miles to the west, then to the Russian River and onwards to the Pacific Ocean.

The project site is dominated by grassland (ruderal) habitat, but according to the Santa Rosa Plain Conservation Strategy, it is located within the potential range of the Sonoma County Distinct Population Segment of the California tiger salamander (CTS) (a*mbystoma californiense*) and within

1.3 miles from known or extirpated breeding pools.[1] In addition, the revised Figure 3 contained in the Santa Rosa Plain Conservation Strategy shows the site designated for future development.[2] The site contains a seasonal wetland (Exhibit 3), measuring approximately 0.14 acre in surface area and located between two elevated berms to the west and east.[3] Dominant species in the wetland area included non-native soft chess (*Bromus hordeaceus*), Mediterranean barley (*Hordeum marinum* ssp. *gussoneanum*), and Italian rye (*Festuca perennis*). Other species observed within the wetland include curly dock (*Rumex crispus*), ripgut brome (*Bromus diandrus*), cutleaf geranium (*Geranium dissectum*), brome fescue (*Festuca bromoides*), bindweed (*Convolvulus arvensis*), wild oat (*Avena* sp.), spinyfruit buttercup (*Ranunculus muricatus*), and Harding grass (*Phalaris aquatica*). The only native species observed within the wetland were occasional small patches of meadow barley (*Hordeum brachyantherum*), creeping spikerush (*Eleocharis macrostachya*), and individuals of miniature lupine (*Lupinus bicolor*).[4]

Existing Land Use and Zoning

The project site is designated Light Industry by the Santa Rosa General Plan 2035 (Exhibit 4a). The Light Industry designation is intended for light industrial, warehousing, and heavy commercial uses. Uses appropriate to this land use category include auto repair, bulk or warehoused goods, general warehousing, and services with large space needs, such as health clubs. The proposed project is also zoned Light Industrial (IL), which is compatible with the Light Industrial classification in the General Plan (Exhibit 4b).

The project site is located within the planning area of the Santa Rosa Roseland Area/Sebastopol Road Specific Plan (Specific Plan), which designates the project site as Light Industry, which allows for Light industrial, warehousing, and heavy commercial uses (Exhibit 4c).[5]

1.4 - Project Description

Canine Companions for Independence (applicant and/or CCI) proposes to develop a new Canine Early Development Center (CEDC), veterinary clinic, and animal hospital (Exhibit 5). The proposed project would be located on an approximately 2.98-acre area (Assessor's Parcel Number [APN] 043-135-031) in the northern portion of the existing CCI 12.87-acre campus, located at 2965 Dutton Avenue. The proposed project would employ approximately 30 full-time employees. The existing buildings that are part of the CCI campus to the south of the project site will continue operating multiple Canine Companions functions. The existing 18,000-square-foot building located to the east at 2815 Duke Court, is currently leased by Canine Companions as the CEDC and will cease being used after completion of construction.

The new CEDC building would include a 1-story, 21,991-square-foot building with 8,972-square feet of exterior impervious surface areas for dog runs and play areas adjacent to and surrounding the building (Exhibit 6). The CEDC building would contain offices, changing rooms, bathrooms, a kitchen,

1 California Department of Fish and Wildlife (CDFW). 2005. Santa Rosa Plain Conservation Strategy, Figure 2.
2 California Department of Fish and Wildlife (CDFW). 2005. Santa Rosa Plain Conservation Strategy, Figure 3.
3 Prunuske Chatham, Inc. (PCI). 2020. Jurisdictional Delineation Report. February.
4 Prunuske Chatham, Inc. (PCI). 2020. 2965 Dutton Avenue–Follow-up Botanical Survey. May 11.
5 City of Santa Rosa. 2016. Roseland Area/Sebastopol Road Specific Plan. November.

and social rooms for the employees to use. The CEDC building would also include dog kennels for boarding, as well as different entrances on the east and west side of the structure to accommodate different types of dogs. The dog run and play areas would be located along each side of the CEDC building and would drain to a sewer connection with a switch valve that would go to the storm drain system during rain events. A trash enclosure, approximately 500 square feet in size, would be located near the parking lot on the northeast side of the building with lighting, power, potable water, and sewer connections. Backup generators would be housed in a separate enclosure next to the trash enclosure. Additionally, the CEDC building would include a solar photovoltaic system on the roof.

The new veterinary clinic and animal hospital would be approximately 5,180 square feet and would contain a reception area, break area, office spaces, surgical and treatment areas, X-ray and ultrasound rooms, and kennel areas (Exhibit 7).

Project construction would occur over an estimated 14-month period. For the purposes of this analysis, project construction was assumed to occur from July 2021 to September 2022. As part of proposed project, the construction contractor would:

- Substitute electrified equipment for diesel- and gasoline-powered equipment where practical.
- Use alternative fuels for construction equipment on-site, where feasible, such as compressed natural gas, liquefied natural gas, propane, or biodiesel.
- Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.

Construction activities would include typical phases such as site preparation and grading, building construction, paving, and architectural coating. Site grading would result in the distribution of soil across the site to achieve level topography and no trees would be removed. Cut and fill would balance across the site; no import or export of soil is proposed. 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 or on abutting right-of-way, pursuant to an encroachment permit.

Building Design

The project buildings would maintain and enhance the design characteristics of the existing CCI campus to the south and include smooth acrylic finish stucco walls with parapets, exposed score lines, concrete roof tiling, and shade awnings. Both single-story buildings would include parapet walls that screen rooftop mechanical equipment. Exhibit 8 shows the proposed project design and exterior.

Proposed Land Use and Zoning

The proposed project would maintain the existing land use designation and zoning. Per Section 20-24.03 of the Santa Rosa Municipal Code, the proposed project would require a Minor Conditional Use Permit (MUP) to allow for the development of a veterinary clinic and kennel boarding use within the Industrial district. In addition, the proposed project would be subject to design review by the City Planning and Economic Development Department.

Circulation

The proposed project would provide two driveways for site access: (1) an existing driveway from the circular drive off Dutton Avenue that serves the existing CCI operations, and (2) a new driveway access from just north of the Dutton Avenue/Duke Court intersection (Exhibit 5). The proposed project would include a parking lot with drive aisles that would follow the northern project boundary connecting the two driveways. The proposed project would observe a 50-foot setback from Colgan Creek top of bank consistent with Santa Rosa City Code Chapter 20-30.040 Creekside Development. The proposed project would include site circulation improvements such as new sidewalks, internal walkways, and a central plaza between the CEDC building, veterinary clinic, and animal hospital. The project site would be surrounded by steel security fencing with sliding gates at both driveways.

Utilities

Water and Wastewater

The proposed buildings would connect to existing water lines and sanitary sewer lines located within Dutton Avenue. Water and wastewater services would be provided by the City of Santa Rosa. As previously noted, the dog run and play areas would be served by a sewer connection.

Storm Drainage

The proposed project would include stormwater treatment landscaping along the northern project frontage. The proposed project would include new stormwater drainage lines of various diameters within the project site that would convey all project stormwater to existing stormwater drainage infrastructure in Dutton Avenue. The dog run and play areas would be located along each side of the CEDC building and would drain to a sewer connection with a switch valve that will go to the storm drain system during rain events.

Electricity, Natural Gas, and Telecommunications

The proposed project would be served with electricity generated by Sonoma Clean Power and delivered by Pacific Gas and Electric Company (PG&E). A solar system would be installed on the roof of the CEDC. Natural gas services would be provided by PG&E. Local telephone service would be provided by AT&T, and cable television would be provided by Comcast.

Lighting

Proposed lighting would be provided around the perimeter of the buildings, in the parking areas, along walkways, and in the central plaza. All lighting would comply with the City's lighting standards and be downlit.

Landscaping

The proposed project would include landscaping throughout the project site that would include a diverse range of low water demand plantings. Landscaping would consist of trees, shrubs, and ground covering plantings that would be non-toxic to dogs. Exhibit 9 shows the proposed landscaping on the project site.

The proposed project would include an automatic irrigation system that would irrigate all landscaped areas with a weather system override in order to adjust the amount of water that is delivered. This system would measure evapotranspiration and be designed to irrigate each hydrozone

independently in order to minimize water waste. Proposed trees would be irrigated by separate dedicated irrigation. The proposed irrigation system would meet all aspects of the City of Santa Rosa Water Efficiency Landscape Ordinance (Chapter 14-30).

Parking

The proposed project would include 68 parking spaces, six of which would be Americans with Disabilities Act (ADA) compliant spaces, and bike parking on the north side of the vet clinic as shown in Exhibit 5.

Summary of Project Components

Table 1 summarizes the project components.

Table 1: Project Components

Project Portion	Square Feet	Description
Canine Early Development Center	30,963	CEDC structure and dog run play areas
Veterinary Clinic	5,180	Veterinary center and animal hospital
Total (building square footage)	36,143	CEDC and veterinary clinic
Parking Spaces	–	68 spaces
Total	**2.98 acres**	**–**
Source: Lafranchi Architecture and Development 2020.		

1.5 - Required Discretionary Approvals

The City of Santa Rosa has discretionary authority over the proposed project and is the CEQA Lead Agency for the preparation of this Draft IS/MND. In order to implement the proposed project, the applicant would need to secure the following discretionary approvals:

- Minor Conditional Use Permit

1.6 - Intended Uses of this Document

This Draft IS/MND has been prepared to determine the appropriate scope and level of detail required in completing the environmental analysis for the proposed project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project. The Draft IS/MND will be circulated for a minimum of 30 days, during which comments concerning the analysis contained in the Draft IS/MND should be sent to:

Kristinae Toomians, Senior Planner
Planning and Economic Development
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404
Phone: 707.543.3223

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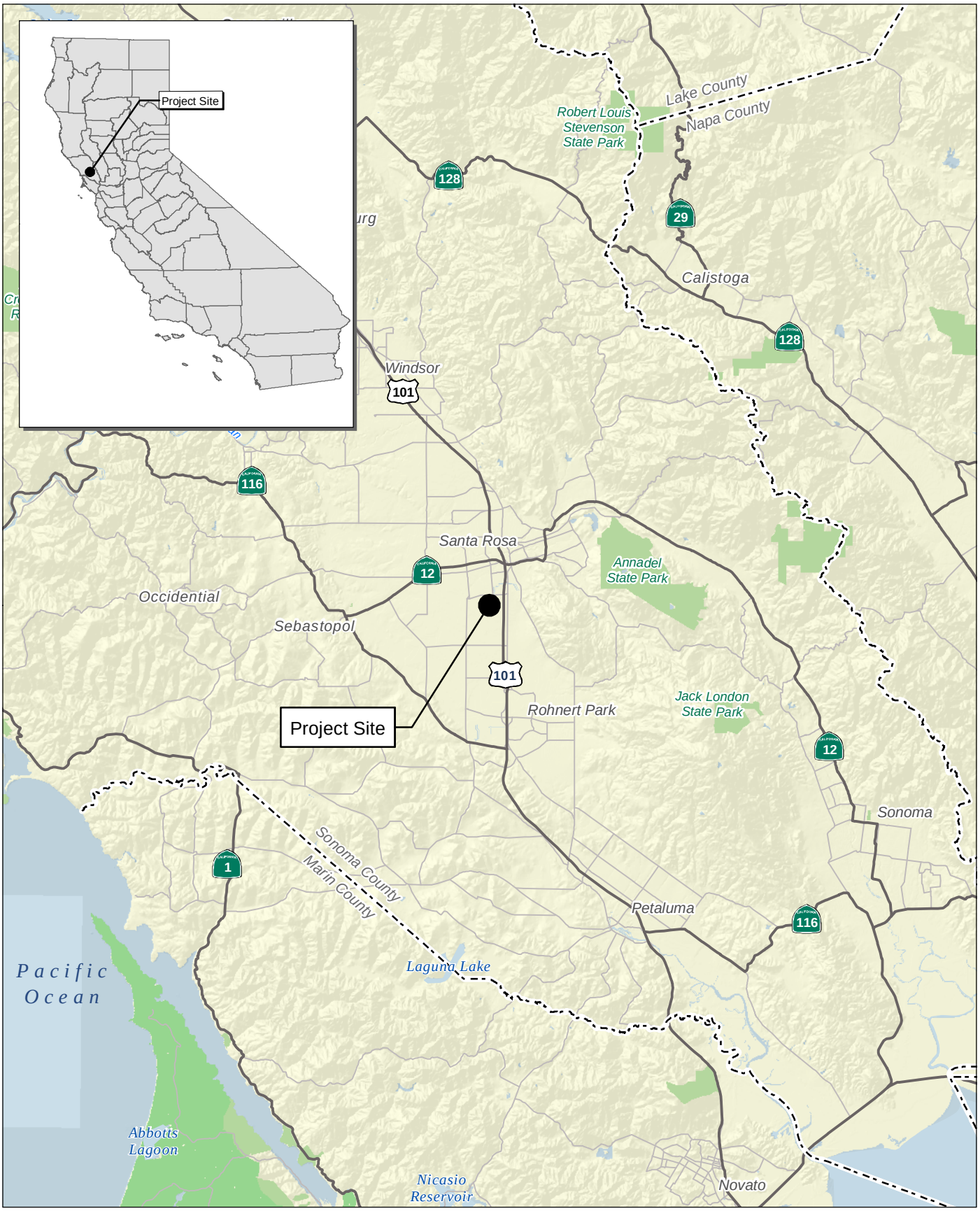

Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

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5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

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CANINE COMPANIONS FOR INDEPENDENCE
CANINE EARLY DEVELOPMENT CENTER AND VET CLINIC
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Source: ESRI Aerial Imagery

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1,000 500 0 1,000 Feet

Exhibit 2
Local Vicinity Map

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Source: Prunuske Chatham, Inc., February 2020.

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Exhibit 3
On-Site Wetland Area

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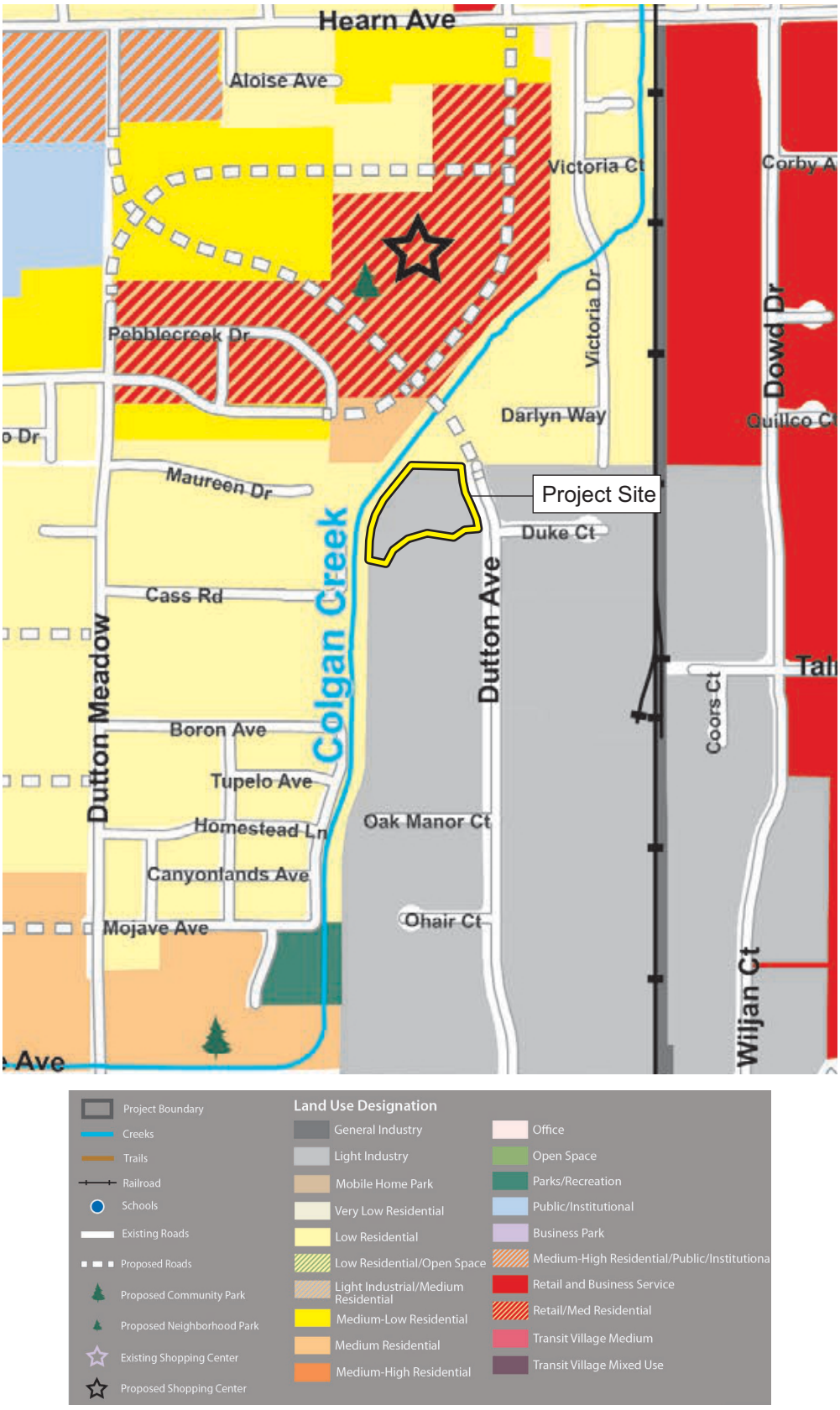

Source: City of Santa Rosa & Michael Baker International.

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Exhibit 4a
Existing General Plan Land Use Designation

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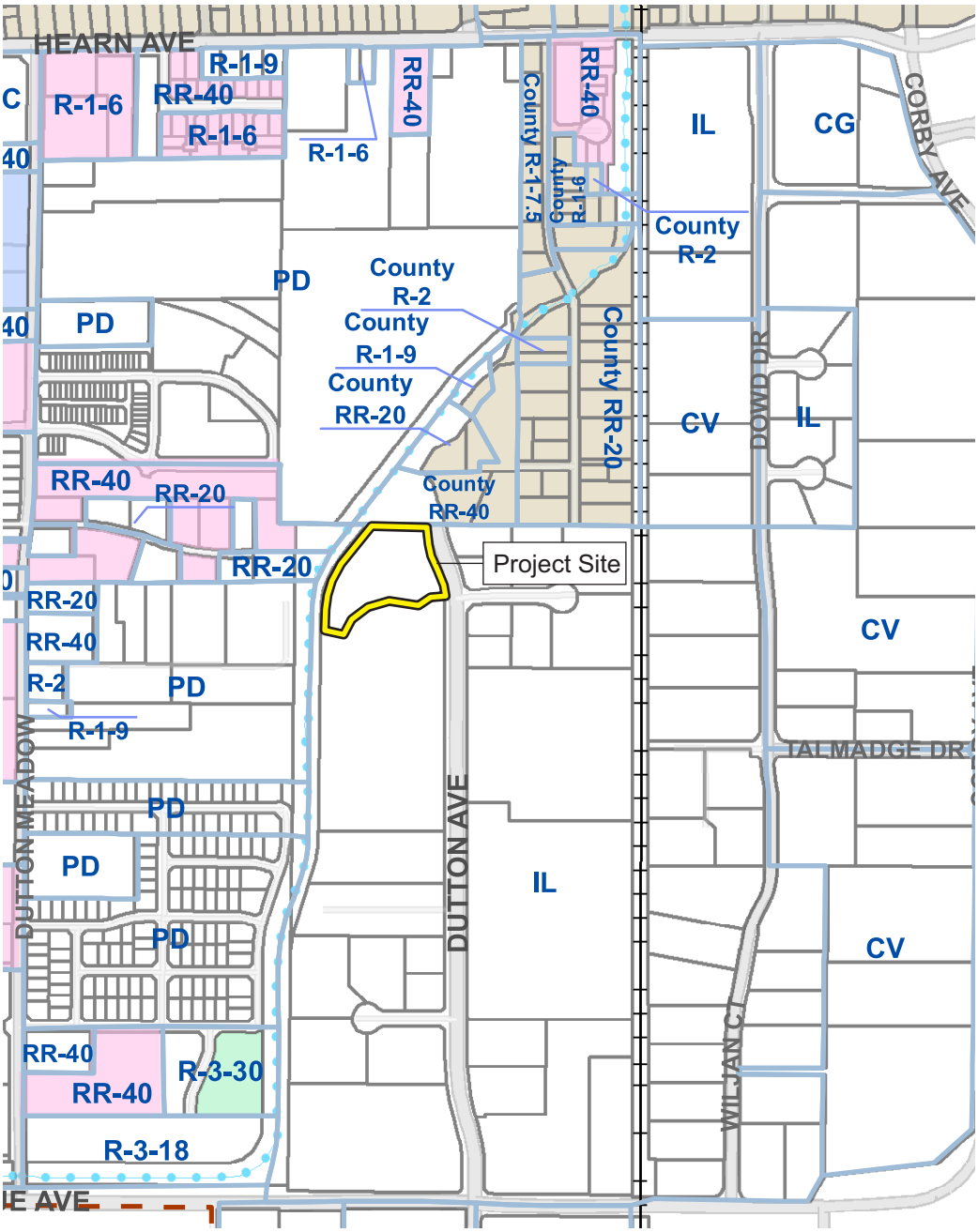

ZONING MAP OF THE CITY OF SANTA ROSA

ZONING
BP Business Park
CD Downtown Commercial
CD-5 Downtown Commercial, 5 stories
CD-7 Downtown Commercial, 7 stories
CD-10 Downtown Commercial, 10 stories
CG General Commercial
CN Neighborhood Commercial
CO Office/Commercial
CSC Commercial Shopping Center
CV Motor Vehicle Sales
IG General Industry
IL Light Industrial
MH Mobile Home Park
OSC Open Space Conservation
OSR Open Space Recreation
PD Planned Development
PI Public/Institutional
R-1-6, R-1-7.5, R-1-9, R-1-15 Single Family Residential
R-2, R-3-10, R-3-15, R-3-18, R-3-30, R-3-HD Multi Family Residential
RR-20, RR-40 Rural Residential
TV-R Transit Village - Residential
TV-M - Transit Village - Mixed Use

COMBINING DISTRICTS
-G = Gateway
-H = Historic
-LIL = Limited Light Industrial
-SA = Station Area
-SR = Scenic Road

UGB
Zoning
Hillside
Hillside & Small Lot
Small Lot
Railroad
All Other Creeks
Santa Rosa Creek
Lakes & Ponds
Parks
Schools
COUNTY
SANTA ROSA

1 inch = 1,000 feet

0 1000 2000 3000 4000 5000 Feet

N

Source: City of Santa Rosa.

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Exhibit 4b
Existing Zoning

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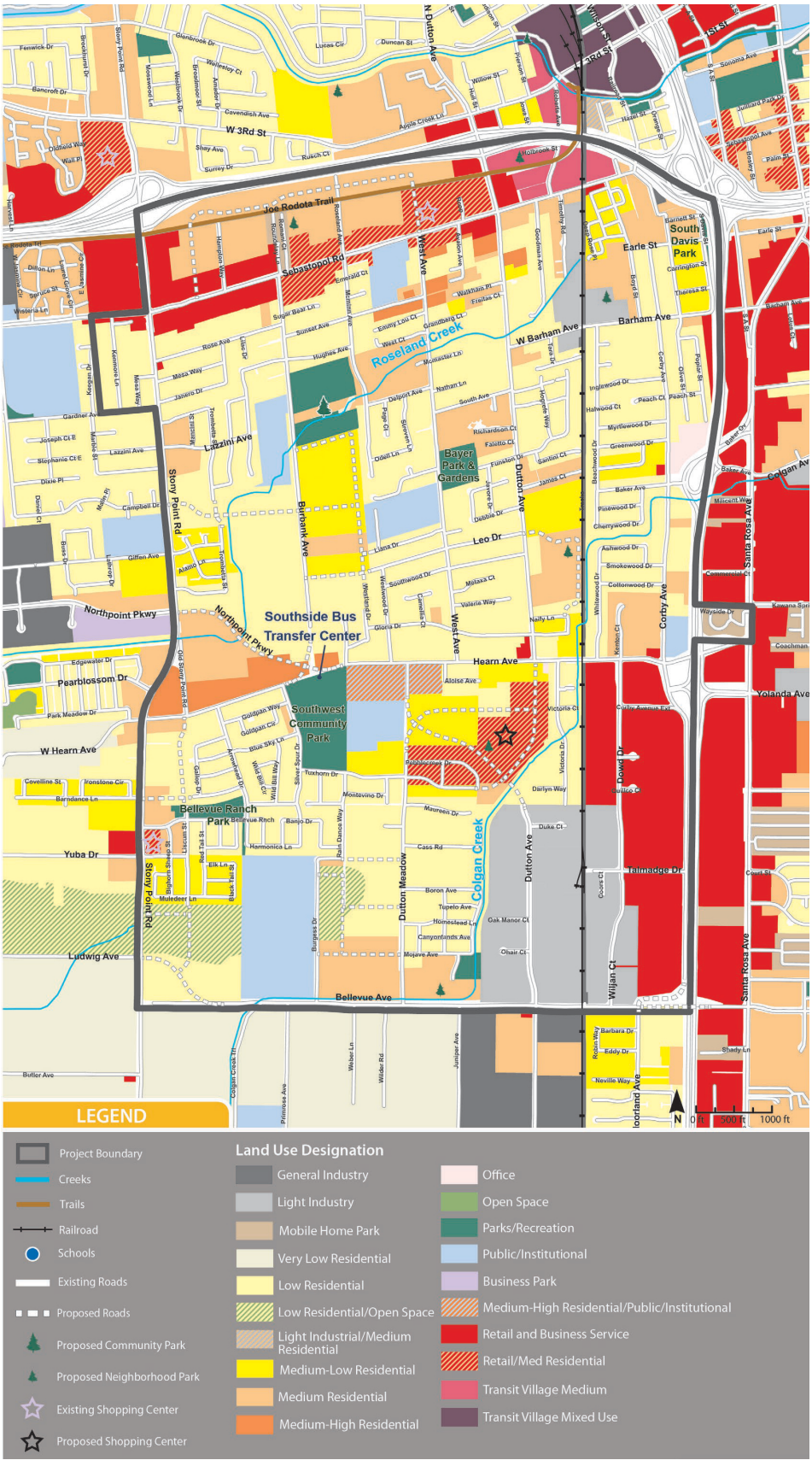

Source: City of Santa Rosa & Michael Baker International.

Exhibit 4c
Roseland Area/Sebastopol Road Specific Plan Land Use Designations

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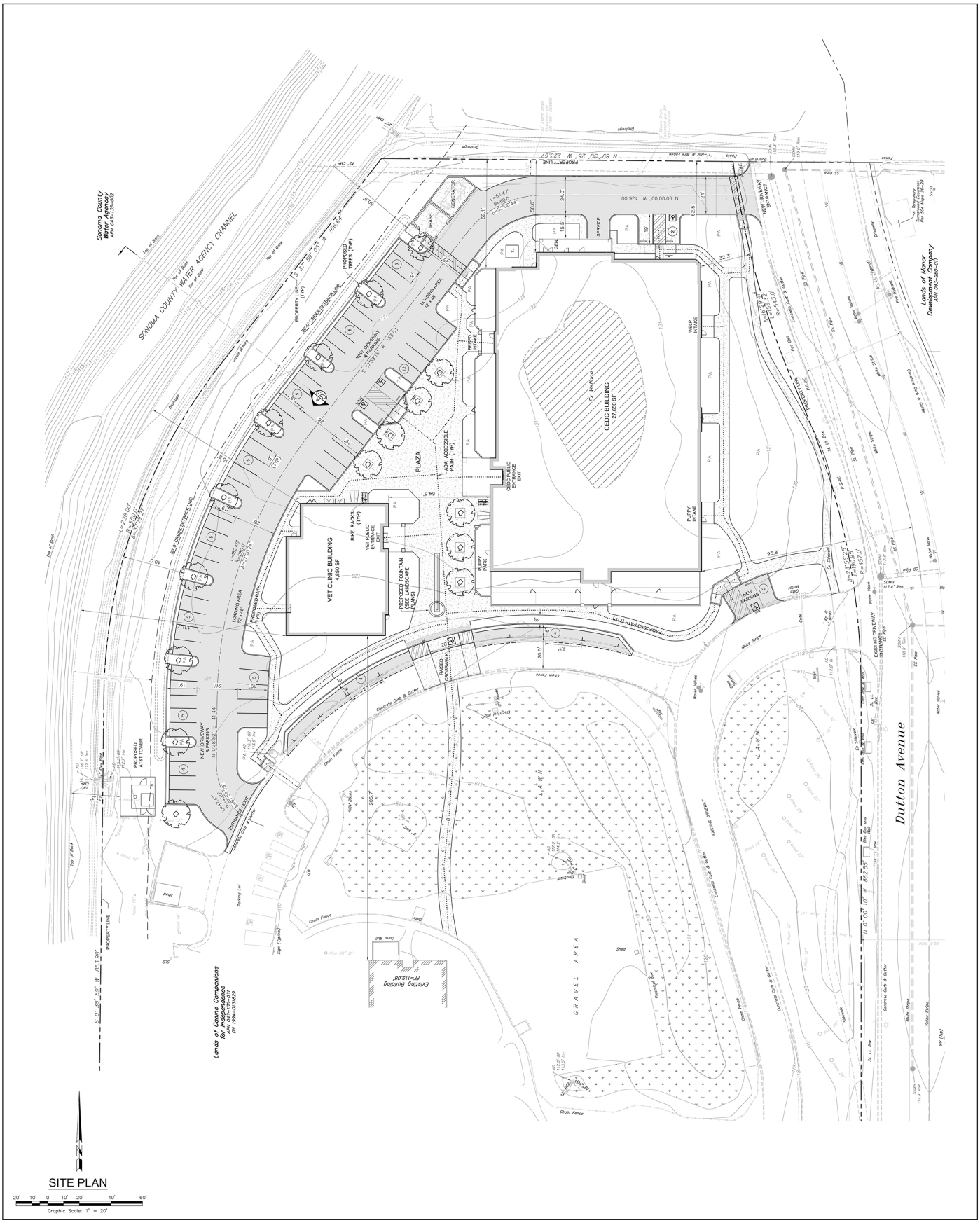

Source: Lafranchi Architecture & Development, 12/22/20.

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Exhibit 5
Project Site Plan

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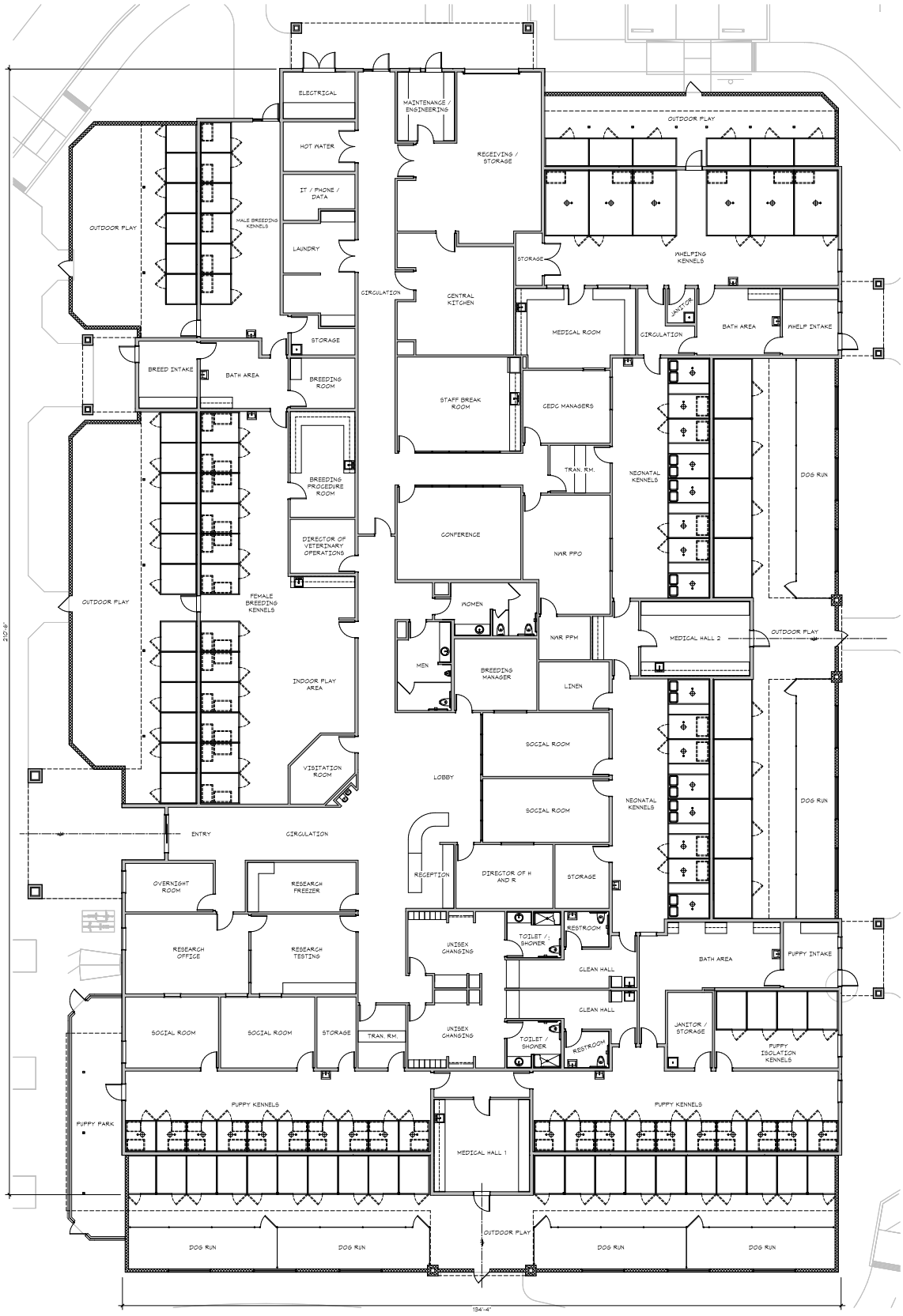

Source: Lafranchi Architecture & Development, 12/22/20.

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Exhibit 6
CEDC Building Floorplan

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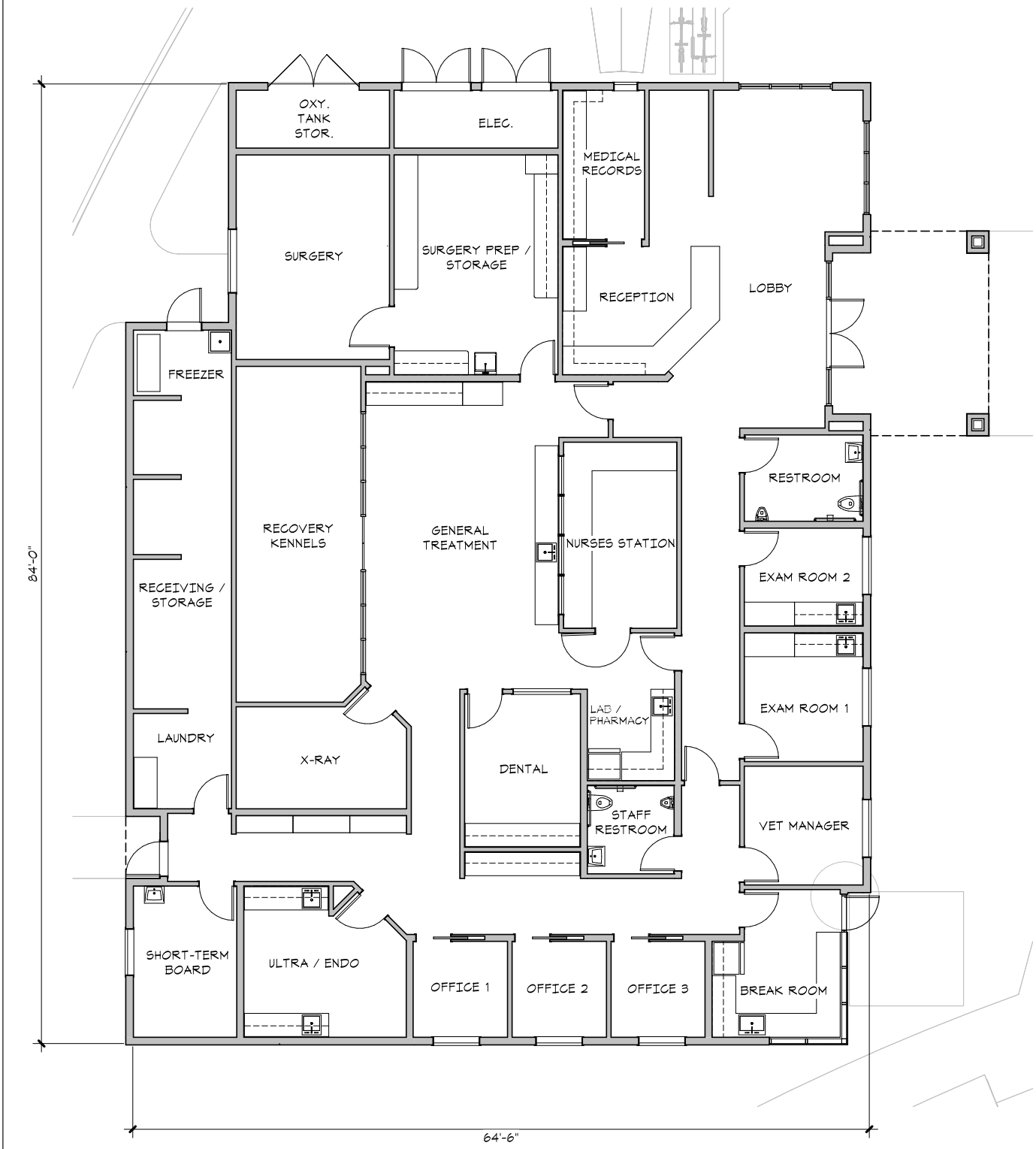

Source: Lafranchi Architecture & Development, 12/22/20.

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Exhibit 7
Veterinary Clinic and Animal Hospital Floorplan

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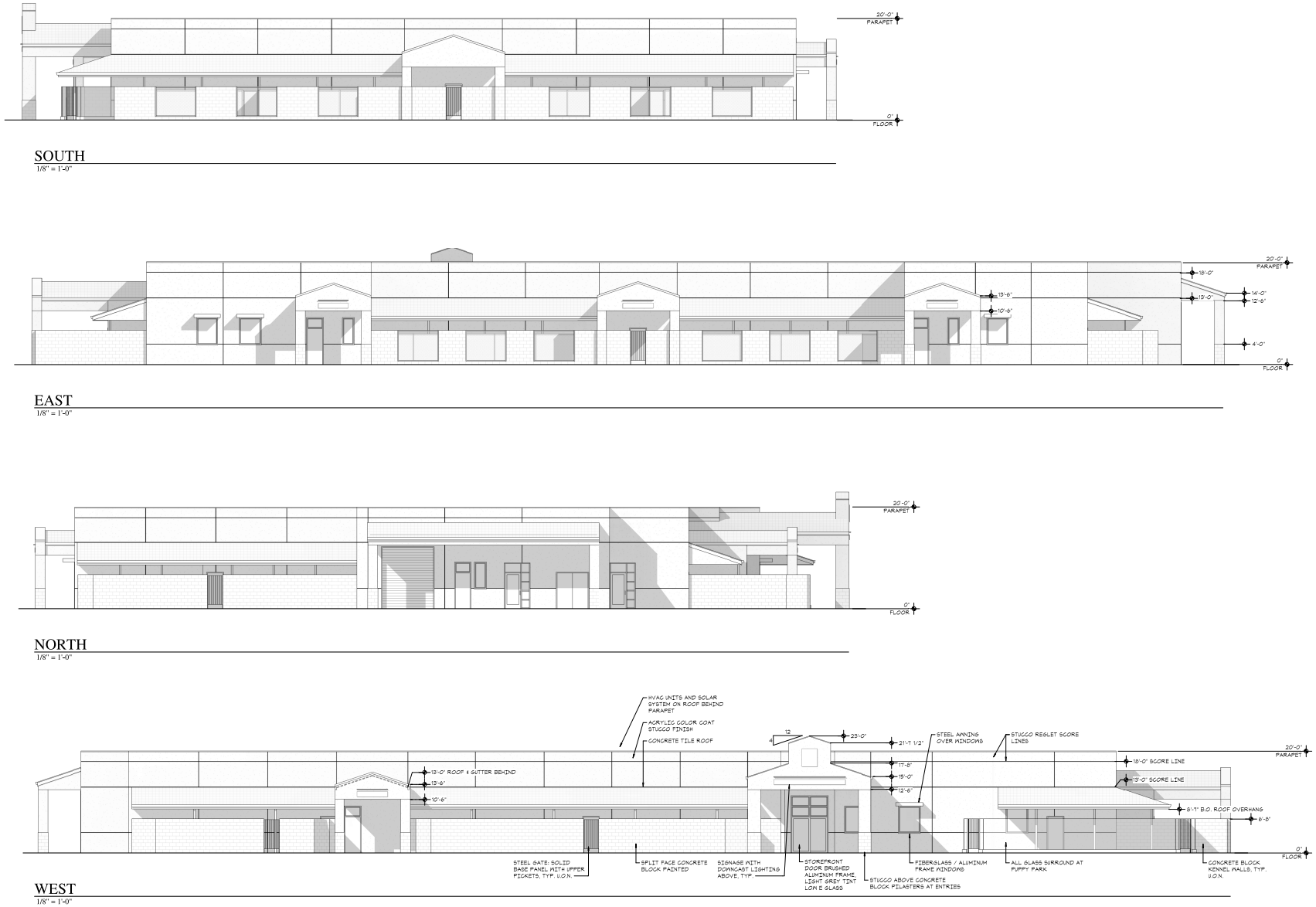

Source: Lafranchi Architecture & Development, 12/22/20.

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Exhibit 8
CEDC Building Exterior Elevations

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Source: Lafranchi Architecture & Development, 12/18/20.

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Exhibit 9
Landscape Plan

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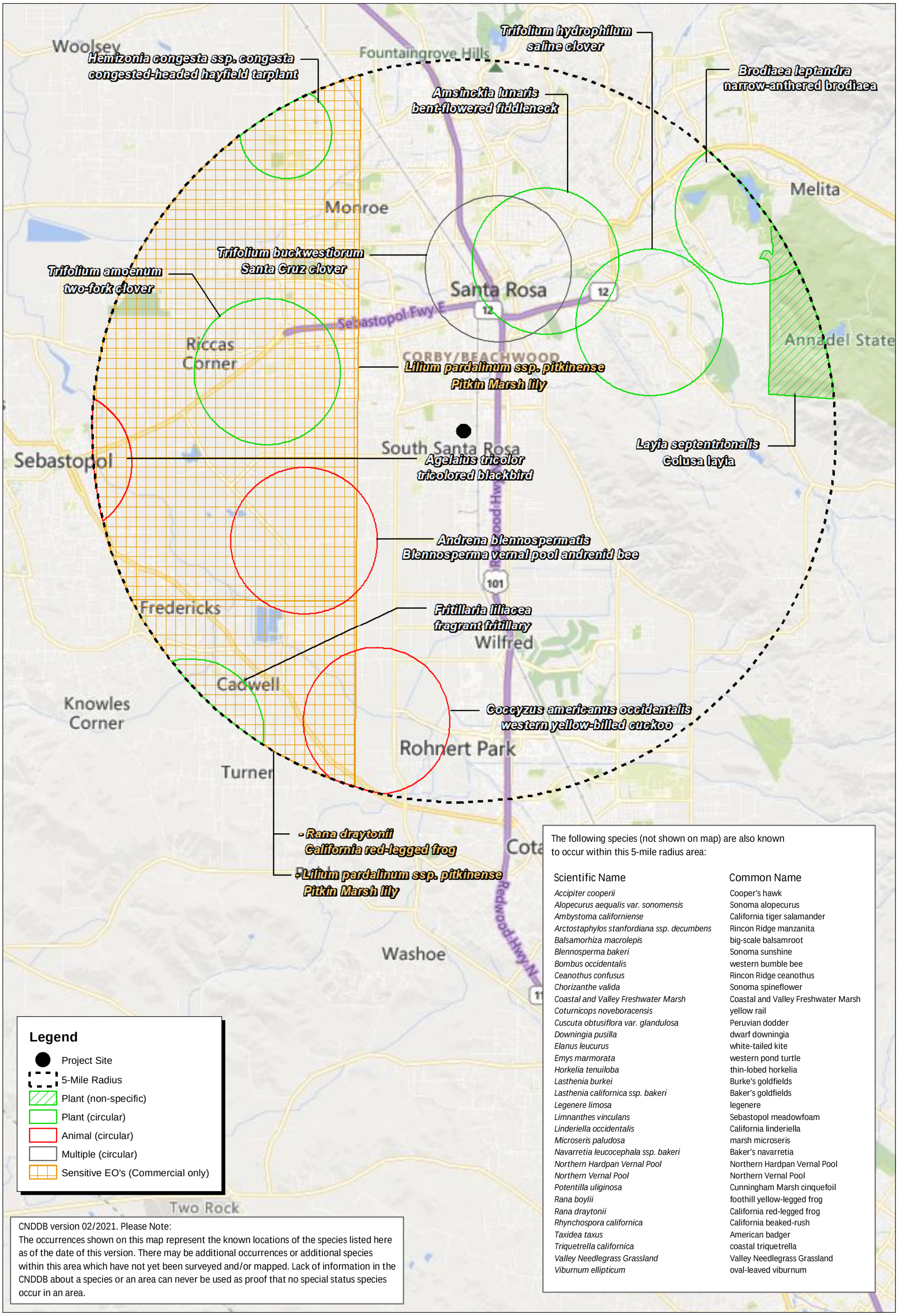

The following species (not shown on map) are also known to occur within this 5-mile radius area:

Scientific Name	Common Name
Accipiter cooperii	Cooper's hawk
Alopecurus aequalis var. sonomensis	Sonoma alopecurus
Ambystoma californiense	California tiger salamander
Arctostaphylos stanfordiana ssp. decumbens	Rincon Ridge manzanita
Balsamorhiza macrolepis	big-scale balsamroot
Blennosperma bakeri	Sonoma sunshine
Bombus occidentalis	western bumble bee
Ceanothus confusus	Rincon Ridge ceanothus
Chorizanthe valida	Sonoma spineflower
Coastal and Valley Freshwater Marsh	Coastal and Valley Freshwater Marsh
Coturnicops noveboracensis	yellow rail
Cuscuta obtusiflora var. glandulosa	Peruvian dodder
Downingia pusilla	dwarf downingia
Elanus leucurus	white-tailed kite
Emys marmorata	western pond turtle
Horkelia tenuiloba	thin-lobed horkelia
Lasthenia burkei	Burke's goldfields
Lasthenia californica ssp. bakeri	Baker's goldfields
Legenere limosa	legenere
Limnanthes vinculans	Sebastopol meadowfoam
Linderiella occidentalis	California linderiella
Microseris paludosa	marsh microseris
Navarretia leucocephala ssp. bakeri	Baker's navarretia
Northern Hardpan Vernal Pool	Northern Hardpan Vernal Pool
Northern Vernal Pool	Northern Vernal Pool
Potentilla uliginosa	Cunningham Marsh cinquefoil
Rana boylii	foothill yellow-legged frog
Rana draytonii	California red-legged frog
Rhynchospora californica	California beaked-rush
Taxidea taxus	American badger
Triquetrella californica	coastal triquetrella
Valley Needlegrass Grassland	Valley Needlegrass Grassland
Viburnum ellipticum	oval-leaved viburnum

CNDDB version 02/2021. Please Note:
The occurrences shown on this map represent the known locations of the species listed here as of the date of this version. There may be additional occurrences or additional species within this area which have not yet been surveyed and/or mapped. Lack of information in the CNDDB about a species or an area can never be used as proof that no special status species occur in an area.

Source: Bing Street Imagery. California Natural Diversity Database (CNDDB), February 2021.

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6,400 3,200 0 6,400 Feet

54860001 • 02/2021 | 10_CNDDB.mxd

Exhibit 10
CNDDB Special-Status Species Occurrences (5-mile radius)

CANINE COMPANIONS FOR INDEPENDENCE
CANINE EARLY DEVELOPMENT CENTER AND VET CLINIC
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

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

Environmental Determination

On the basis of this initial evaluation:

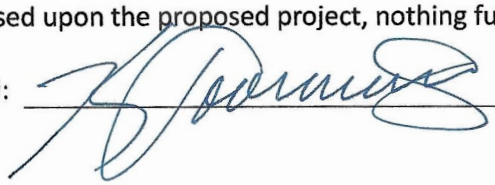
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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

Date: 8/5/2021 Signed: 

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.1 Aesthetics *Except as provided in Public Resources Code Section 21099, would the project:*				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Evaluation

Setting

This section provides a description of existing visual conditions at and near the project site and an assessment of changes to those conditions that would occur from implementation of the proposed project. Review of the Santa Rosa General Plan 2035 (General Plan) provides a basis for the description and analysis in this section.

A proposed project's effect on the visual environment is generally defined in the following terms: (i) a project's physical characteristics and potential visibility, (ii) the extent to which the project's presence would change the perceived visual character and quality of the environment where it would be located, and (iii) the expected level of sensitivity that the viewing public may have in areas where project facilities would alter existing views.

The aesthetic quality of a community is composed of visual resources, which are physical features that make up the visible landscape, including land, water, vegetation, and the built environment (e.g., buildings, roadways, and structures).

Visual Setting

The General Plan Urban Design Element identifies the qualities that make Santa Rosa a unique city. The major topics included are downtown, major city entries, neighborhood design, and hillside development. The General Plan Urban Design Element identifies the following scenic resources by major topic within the City:

Downtown. Downtown Santa Rosa located approximately 2 miles to the northeast is generally bound by College Avenue on the north, Brookwood Avenue on the east, Santa Rosa Creek/Sonoma Avenue on the south, and the North Western Pacific Railroad tracks on the west. Mixed office and retail uses are focused within the downtown core, surrounding Old Courthouse Square, and extending both east and west along Third and Fourth Streets. Santa Rosa Plaza, an indoor mall, is located between Old Courthouse Square and Highway 101. Railroad Square, west of Highway 101, features retail, services, and hotel use.

Major City Entries. An east-west highway through western Santa Rosa, State Route 12 (SR-12)—known locally as Sonoma Highway—is a regional/arterial street located east of Farmers Lane, approximately 1.8 miles to the north. City entries occur at the Urban Growth Boundary (UGB) in the east (North Melita Road intersection, located approximately 5 miles to the northeast) and west (Fulton Road, located approximately 3 miles to the northwest).

Neighborhood Design. Santa Rosa's diverse neighborhoods offer an array of housing choices. Historic neighborhoods of Victorian cottages and California bungalows contrast dramatically with recent large-scale master planned developments. Some of the most fragile neighborhoods are the rural enclaves with farmhouses, fields, barns, and outbuildings. Urban Design policies attempt to preserve the special character of older neighborhoods while ensuring that new development establishes a sense of neighborhood.

Hillside Development. Santa Rosa is framed by the Sonoma Mountain foothills, which are prominently visible from many locations in the flatland areas of the City, including a partially obstructed view from the project site. The City wishes to retain these views and the natural character of the unbuilt hills by regulating development that might occur on them. Sugarloaf Ridge, located more than 10 miles to the east, across Sonoma Highway, is defined in the General Plan as a protected ridgeline and shown in Figure 7-3 of the General Plan. The General Plan includes goals and policies that protect ridgelines and limit ridgeline development.

The existing visual character of the surrounding area generally consists of undeveloped fields, light industry, and low-density residential neighborhoods (Exhibit 2). The existing visual character of the project site is defined by undeveloped grassland. The project site contains a wetland located between two elevated berms. A number of non-native plant and grass species and three native plant species exist in the wetland.

The City of Santa Rosa designates major highways and regional roadways in the City that offer visually pleasing experiences. In addition, the City also designates scenic roads because of their natural setting or historical and cultural features. A scenic road is defined as a highway, road, drive, or street that, in addition to its transportation function, provides opportunities for the enjoyment of natural and human-made scenic resources. Scenic roads direct views to areas of exceptional beauty,

natural resources or landmarks, or historic or cultural interest.[6] The following roadways are located near the project site and are designated in the General Plan as scenic roads:

- Petaluma Hill Road (from Colgan Avenue to UGB): This roadway is approximately 1.3 miles east of the project site.
- Highway 101 (contiguous from northern to southern city limit): This roadway is approximately 0.4 mile east of the project site.
- Wright Road South: This roadway is approximately 2.39 miles west of the project site.
- Ludwig Avenue: This roadway is approximately 1 mile southwest of the project site.
- Burbank Avenue: This roadway is located approximately 0.7 mile northwest of the project site.
- Highway 12: This roadway is approximately 1.8 miles north of the project site.

Lighting and Glare

Sources of daytime glare include direct beam sunlight and reflections from windows, architectural coatings, glass, and other reflective surfaces. Nighttime illumination and associated glare are generally divided into two sources: stationary and mobile. Stationary sources include structure lighting and decorative landscaping, lighted signs, solar panels, and streetlights. Mobile sources are primarily headlights from motor vehicles.

The project site is located in a partially developed area of the City with some existing lighting. East of the project site is Dutton Road, which has existing streetlights. The residences to the northeast and southwest of the project site contain existing light and glare from urban infrastructure such as roads, windows, and lighting. The area north of the project site is sparsely developed and contains minimal lighting. Directly adjacent to the east of the project site is Colgan Creek.

Chapter 20-30.080 of the City Code establishes standards for lighting. Standards include a maximum height of 14 feet for outdoor lighting. Light fixtures shall be shielded or recessed to reduce light spillage onto adjoining properties. Each light fixture shall be directed downward and away from adjoining properties and public right-of-way, so that no on-site light fixture directly illuminates an area off the site. No lighting on private property is permitted to produce an illumination level greater than 1 foot-candle on any property within a residential zoning district except on the site of the light source. Would the project:

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

Less than significant impact. As described previously, several scenic resources and designated scenic roadways are identified in the General Plan. However, the distance to each of these resources as well as intervening development prevents the project site from being visible from any of these scenic resources or roadways. For example, the closest scenic resource is Highway 101, and the project site is not visible from any portion of this roadway. Additionally, the proposed project is not located near downtown Santa Rosa, protected hillsides, or a major city entry. The proposed project would be 1-

[6] City of Santa Rosa. 2009. Santa Rosa General Plan 2035. Draft Environmental Impact Report, page 4.K-2.

story, approximately the same height or shorter than the buildings in the surrounding area and as a result, would not block views of a scenic vista from nearby roadways or land uses. In summary, project development would not significantly affect a scenic vista or designated scenic road. Therefore, impacts would be less than significant.

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

Less than significant impact. The nearest officially designated State Scenic Highway is SR-116, approximately 5.38 miles west of the project site.[7] The second nearest officially designated State Scenic Highway is a segment of Sonoma Highway, located approximately 6.6 miles to the northeast of the project site. Another portion of Sonoma Highway is designated as "Eligible for Scenic Designation" and is 1.56 miles northeast of the project site. The project site is not visible from either SR-116 or Sonoma Highway. Therefore, impacts would be less than significant.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than significant impact. The project site is located in a mostly developed area and is surrounded by commercial and light industrial uses, as well as some residences. The project site consists of undeveloped land directly north of the existing driveway to the CCI Headquarters. Colgan Creek, a flood control channel, borders the site to the west. The closest area with public views is Lower Colgan Creek Park, from which the project site is not visible. The proposed use would be compatible with surrounding existing development and would not therefore substantially degrade the existing visual character of quality of public views of the site and its surroundings.

The project site is designated Light Industry and zoned as Light Industrial. The proposed project would maintain the existing land use designation and zoning, but it would require a discretionary approval of an MUP to allow for the development of the veterinary clinic and kennel boarding use within the Industrial district. The proposed project would follow all design regulations governing scenic quality and would not conflict with an applicable zoning or other regulations governing scenic quality. Therefore, impacts would be less than significant.

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

Less than significant impact. New sources of light associated with the proposed project include interior lighting and exterior lighting around the perimeter of the buildings, in the parking areas, along walkways, and in the central plaza. The lighting would comply with the City's lighting standards and be downlit. Rooftop solar panels would introduce a new source of glare to the project site.

[7] California Department of Transportation (Caltrans). Website: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed April 6, 2021.

The City would review the proposed project for consistency with General Plan policies and design guidelines intended to reduce daytime glare and nighttime lighting. In addition, during design review, the City would ensure the proposed exterior lighting complies with Santa Rosa Municipal Code Chapter 20-20.080. The lighting standards contained in Chapter 20-30.080 of the Municipal Code would prevent lighting from spilling off-site and limit light fixture heights to a maximum of 14 feet tall. Consistency with the Municipal Code would ensure lighting impacts from the proposed project would be reduced to the maximum extent practicable. Project solar panels would be installed according to California Green Building Standard Code (CALGreen) and Title 24 standards. The existing surrounding area already contains sources of glare from adjacent buildings, windows, and roadways.

Project-related traffic would increase mobile sources of light due to headlights. However, nighttime automobile headlight lighting impacts would be intermittent and limited to adjacent streets with existing streetlights. As a result, the proposed project would not create a new source of substantial light or glare which adversely affect day or nighttime views in the area. Therefore, impacts from light and glare would be less than significant.

Mitigation Measures

None required.

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

Environmental Evaluation

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection (CAL FIRE) regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (ARB).

Setting

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established by the State Legislature in 1982 to assess the location, quality, and quantity of agricultural lands and conversion of these lands over time. The FMMP has established five farmland categories:

- Prime Farmland is farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land must have been used for irrigated agricultural production at some time during the last 4 years before the mapping date and have the ability to store moisture in soil well.
- Farmland of Statewide Importance is similar to Prime Farmland but contains greater slopes and a lesser ability to store soil moisture.
- Unique Farmland is usually irrigated but may include non-irrigated orchards or vineyards as found in some climate zones in California. This land must still have been cropped some time during 4 years prior to the mapping date.
- Farmland of Local Importance is important to the local agricultural economy as determined by each county's board of supervisors and local advisory committee.
- Grazing Land is land on which the existing vegetation is suited to the grazing livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities.

The FMMP classifies the project site and most of its surroundings as "Urban and Build-up Land."[8] There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located within the vicinity. The project site is not zoned for agricultural uses.

The Williamson Act, classified in 1965 as the California Land Conversation Act, allows local governments to enter into contracts with private landowners, offering tax incentives in exchange for an agreement that the land will remain undeveloped or related open space use only for a period of 10 years. There are currently no properties under Williamson contract located on the project site or within the surrounding area.[9]

Forest Resources

CEQA requires the evaluation of forest and timber resources where those resources are present; however, the project site is located within a developed area of Santa Rosa, and there is no forest land as described in Public Resources Code Section 12220(g), timberland as defined by Public Resources Code Section 4526, or property zoned for Timberland Production as defined by Government Code Section 51104(g) on the site or in its vicinity.

[8] California Department of Conservation. FMMP. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed April 6, 2021.
[9] County of Sonoma Permit Resource Management Department. 2019. Williamson Act 2019 Calendar Year. Website: http://sonomacounty.ca.gov/WorkArea/DownloadAsset.aspx?id=2147565785 Accessed March 4, 2021.

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

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

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

No impact. The General Plan Land Use Diagram designates the project site as Light Industry. The project is also zoned as Light Industrial. There are currently no properties under Williamson contract located on the project site or surrounding area.[10] As such, there would be no impacts relating to conflicts with an 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))?

No impact. The project site is zoned for light industrial use and is in a developed area of Santa Rosa that does not meet the State's definitions of forest land and timberland. Therefore, the proposed project would not conflict with existing zoning for forest land, timberland, or timberland zoned for Timberland Production. No impact would occur.

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

No impact. As described previously, the project site is located in a developed area and does not qualify as forest land as defined by the State. Therefore, the proposed project would not result in the loss of or conversion of forest land to a non-forest use. No impact would occur.

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

Less than significant impact. All areas surrounding the project site are classified as "Farmland of Local Importance" or "Urban and Build-up Land." As stated previously, Farmland of Local Importance is classified as having capacity to yield locally important crops but may not be cultivated at the present time. However, the General Plan designates the adjacent land as Light Industry and the development of the proposed project would not have an impact on the uses of the adjacent land. Therefore, impacts would be less than significant.

[10] County of Sonoma Permit Resource Management Department. 2019. Williamson Act 2019 Calendar Year. Website: http://sonomacounty.ca.gov/WorkArea/DownloadAsset.aspx?id=2147565785 Accessed March 4, 2021.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.3 Air Quality *Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.* *Would the project:*				
a) Conflict with or obstruct implementation of the applicable Air Quality Plan?	☐	☒	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Evaluation

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

Setting

Air pollutants relevant to the CEQA checklist questions for Air Quality are briefly described below.

- Ozone is a gas that is formed when reactive organic gases (ROG) and oxides of nitrogen (NO_X)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are conducive to its formation. Health effects can include, but are not limited to irritated respiratory system, reduced lung function, and aggravated chronic lung diseases.
- ROG, or volatile organic compounds (VOCs), are defined as any compound of carbon—excluding carbon monoxide (CO), carbon dioxide (CO_2), carbonic acid, metallic carbides or carbonates, and ammonium carbonate—that participates in atmospheric photochemical reactions. Although there are slight differences in the definition of ROG and VOCs, the two terms are often used interchangeably.
- Nitrogen dioxide (NO_2) forms quickly from NO_X emissions. Health effects from NO_2 can include the following: potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; contribution to atmospheric discoloration; increased visits to hospital for respiratory illnesses.

- CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are a primary source of CO in the Sonoma County region, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Potential health effects from CO depends on exposure and can include slight headaches; nausea; aggravation of angina pectoris (chest pain) and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; impairment of central nervous system functions; possible increased risk to fetuses; or death.
- Sulfur dioxide (SO_2) is a colorless, pungent gas. At levels greater than 0.5 parts per million (ppm), the gas has a strong odor, similar to rotten eggs. Sulfur oxides (SO_X) include SO_2 and sulfur trioxide. Sulfuric acid is formed from sulfur dioxide, which can lead to acid deposition and can harm natural resources and materials. Although SO_2 concentrations have been reduced to levels well below State and federal standards, further reductions are desirable because SO_2 is a precursor to sulfate and PM_{10}.
- Respirable Particulate Matter (PM_{10}) and Fine Particulate Matter ($PM_{2.5}$) consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. Health effects from short-term exposure (hours/days) can include the following: irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravate existing lung disease, causing asthma attacks and acute bronchitis; those with heart disease can suffer heart attacks and arrhythmias. Health effects from long-term exposure can include the following: reduced lung function; chronic bronchitis; changes in lung morphology; or death.
- Toxic air contaminants (TACs) refer to a diverse group of air pollutants that can affect human health but have not had ambient air quality standards established for them. Diesel particulate matter (DPM) is a toxic air contaminant that is emitted from construction equipment and diesel fueled vehicles and trucks. Some short-term (acute) effects of DPM exposure include eye, nose, throat, and lung irritation, coughs, headaches, light-headedness, and nausea. Studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems. Human studies on the carcinogenicity of DPM demonstrate an increased risk of lung cancer, although the increased risk cannot be clearly attributed to diesel exhaust exposure.

The project site is located in the San Francisco Bay Area Air Basin (Air Basin), where air quality is regulated by the Bay Area Air Quality Management District (BAAQMD). Where available, the significance criteria established or recommended by the BAAQMD were used to make determinations related to the CEQA Appendix G checklist's air quality impact questions. In accordance with CEQA Guidelines Section 15064.7 (Thresholds of Significance), the City exercises its own discretion to use the significance thresholds in the BAAQMD CEQA thresholds based on substantial evidence contained in the BAAQMD's record for adoption of the thresholds (which is relied on and incorporated herein).

Accordingly, the assessment of the project's air quality impacts uses the thresholds and methodologies from the BAAQMD May 2017 CEQA Air Quality Guidelines to determine the potential impacts of the project on the existing environment.[11] The significance thresholds used in this analysis are based on the BAAQMD standards and as set forth in Table 2 below. In developing thresholds of significance for air pollutants, the BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Table 2: Thresholds of Significance

Pollutant	Construction Thresholds Average Daily Emissions	Operational Thresholds	
		Average Daily Emissions	Annual Average Emissions
Criteria Air Pollutants			
VOC (or ROG)	54 pounds/day	54 pounds/day	10 tons/year
NO_X	54 pounds/day	54 pounds/day	10 tons/year
PM_{10}	82 pounds/day	82 pounds/day	15 tons/year
$PM_{2.5}$	54 pounds/day	54 pounds/day	10 tons/year
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 for New Sources			
Excess Cancer Risk	10 per one million	10 per one million	
Chronic or Acute Hazard Index	1.0	1.0	
Incremental annual average $PM_{2.5}$	0.3 µg/m^3	0.3 µg/m^3	
Health Risks and Hazards for Sensitive Receptors (Cumulative from All Sources within 1,000-Foot Zone of Influence) and Cumulative Thresholds for New Sources			
Excess Cancer Risk	100 per 1 million		
Chronic Hazard Index	10.0		
Annual Average $PM_{2.5}$	0.8 µg/m^3		

Notes:
µg/m^3 = micrograms per cubic meter CO = carbon monoxide NO_X = oxides of nitrogen
ppm = parts per million ROG = reactive organic gases VOC = volatile organic compounds
PM_{10} = particulate matter, including dust, 10 micrometers or less in diameter
$PM_{2.5}$ =particulate matter, including dust, 2.5 micrometers or less in diameter
Source: Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. May. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed March 2021.

[11] Bay Area Air Quality Management District (BAAQMD). 2017.California Environmental Quality Act Air Quality Guidelines. May. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed February 22,2021.

Would the project:

a) Conflict with or obstruct implementation of the applicable Air Quality Plan?

Less than significant impact with mitigation incorporated. The project site is located in the Air Basin, where air quality is regulated by the BAAQMD. Attainment status for a pollutant is determined for the Air Basin based on standards set by the United States Environmental Protection Agency (EPA) or California Environmental Protection Agency (Cal/EPA) for federal and State, respectively. The Air Basin is designated nonattainment for 1-hour ozone (State), 8-hour ozone (State and federal), 24-hour PM_{10} (State), annual PM_{10} (State), annual $PM_{2.5}$ (State), and 24-hour $PM_{2.5}$ (federal).[12]

To address regional air quality standards, the BAAQMD has adopted several air quality policies and plans, the most recent of which is the 2017 Clean Air Plan.[13] The 2017 Clean Air Plan was adopted in April of 2017 and serves as the regional air quality plan (AQP) for the Air Basin for attaining federal ambient air quality standards. The primary goals of the 2017 Clean Air Plan are to protect public health and protect the climate. The 2017 Clean Air Plan acknowledges that the BAAQMD's two stated goals of protection are closely related. As such, the 2017 Clean Air Plan identifies a wide range of control measures intended to decrease both criteria pollutants[14] and greenhouse gas (GHG) emissions.[15] In September 2010, the BAAQMD adopted their final Bay Area 2010 Clean Air Plan, which became the most recent ozone plan for the Air Basin. The 2010 Clean Air Plan identifies how the Air Basin would achieve compliance with the State 1-hour air quality standard for ozone, and how the region will reduce ozone transport from the Air Basin to other basins downwind. The 2017 Clean Air Plan updates the BAAQMD 2010 Clean Air Plan, pursuant to air quality planning requirements defined in the California Health and Safety Code.

The 2017 Clean Air Plan also accounts for projections of population growth provided by the Association of Bay Area Governments (ABAG) and Vehicle Miles Traveled (VMT) provided by the Metropolitan Transportation Commission and identifies strategies to bring regional emissions into compliance with federal and State air quality standards. A project would conflict with or obstruct implementation of the 2017 Clean Air Plan if it would result in substantial new regional emissions not foreseen in the air quality planning process.

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

[12] Bay Area Air Quality Management District (BAAQMD). 2017. Air Quality Standards and Attainment Status. Last updated January 2017. Website: https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status. Website: Accessed February 23, 2021.

[13] Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan. April 19. Website: http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans. Accessed February 23, 2021.

[14] The EPA has established National Ambient Air Quality Standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as "criteria" air pollutants (or simply "criteria pollutants").

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

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

Criterion 1

The primary goals of the 2017 Clean Air Plan, the current AQP to date, are to:

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

A measure for determining if the proposed project supports the primary goals of the AQP is if the proposed project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQPs. The development of the AQP is based, in part, on the land use general plan determinations of the various cities and counties that constitute the Air Basin. The project site is designated Light Industry by the General Plan (Exhibit 4a) and zoned Light Industrial (IL) by the Santa Rosa Zoning Ordinance, which is compatible with the Light Industrial classification in the General Plan (Exhibit 4b). The Light Industry designation is intended for light industrial, warehousing, and heavy commercial uses. Uses appropriate to this land use category include auto repair, bulk or warehoused goods, general warehousing, and services with large space needs, such as health clubs.[16] The project site is located within the planning area of the Santa Rosa Roseland Area/Sebastopol Road Specific Plan (Specific Plan), which designates the project site as Light Industry, which allows for accessory offices, retail, and manufacturing and distribution activities with potential for creating nuisances (Exhibit 4c).[17]

The proposed project would be consistent with these existing land use designations because the canine development center and vet clinic are acceptable uses under the Zoning Ordinance with a MUP. Additionally, the proposed CEDC building would be 23 feet tall at the entry ridge with a standard parapet maximum height of 20 feet, while the veterinary clinic would be a maximum of 16-feet tall. As a result, both buildings would not exceed the 55-foot height limit for Light Industrial uses. Therefore, emissions related to development of the project site were included in growth forecasts for the current AQP.

The proposed project would develop a new 21,991-square-foot CEDC building with 8,972 square feet of exterior impervious surface areas for dog runs and play areas as well as a 5,180-square-foot veterinary clinic. The proposed project is consistent with the project site's existing zoning and General Plan land use designation and traffic generated by the proposed project would be included in the traffic volumes projected in the General Plan and subsequent air quality plan. Additionally, the Sonoma County Transportation Authority (SCTA) prepared a draft screening map for the City of Santa Rosa that shows the project site to be within a screened area. As a result, the proposed project

[16] City of Santa Rosa. 2009. Santa Rosa General Plan 2035, pages 2-9. Website: https://srcity.org/DocumentCenter/View/24327/Santa-Rosa-General-Plan-2035-PDF-July-2019. Accessed February 23, 2021

[17] City of Santa Rosa. 2016. Roseland Area/Sebastopol Road Specific Plan. November.

would have a less-than-significant VMT impact associated with employee travel. Because the proposed project would not increase the VMT generated by the project site compared to the assumptions used in the AQP, it is reasonable to conclude that the proposed project would comply with the goals and development assumptions in the applicable AQP.

Criterion 2

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

Table 3 lists the Clean Air Plan policies relevant to the proposed project and evaluates the project's consistency with the policies. As shown below, the proposed project would be consistent with applicable measures.

Table 3: Project Consistency with Applicable Clean Air Plan Control Measures

Control Measure	Project Consistency
Stationary Control Measures	
SS29: Asphaltic Concrete	**Consistent.** Paving activities associated with the proposed project would be required to utilize asphalt that does not exceed BAAQMD emission standards.
SS36: Particulate Matter from Trackout	**Consistent.** Mud and dirt that may be tracked out onto the nearby public roads during construction activities shall be removed promptly by the contractor based on BAAQMD's requirements. Mitigation Measure (MM) AIR-1, identified under Impact 3(b), would implement Best Management Practices (BMPs) recommended by the BAAQMD for particulate matter (PM) dust emissions during construction.
SS38: Fugitive Dust	**Consistent.** Material stockpiling and trackout during grading activities shall utilize BMPs recommended by the BAAQMD to minimize the creation of fugitive PM dust. MM AIR-1, identified under Impact 3(b), would require the BMPs recommended by the BAAQMD for fugitive PM dust emissions to be implemented during construction.

Control Measure	Project Consistency
Buildings Control Measures	
BL1: Green Buildings	**Consistent.** The proposed project would comply with the latest energy efficiency standards, California Green Building Standards Code (CALGreen), and would incorporate applicable energy efficiency features designed to reduce project energy consumption. Details related to applicable energy efficiency features are described in more detail in Impact 6, Energy.
BL2: Decarbonize Buildings	**Consistent.** The proposed project would comply with the latest energy efficiency standards (such as CALGreen) and incorporate applicable energy efficiency features designed to reduce project energy consumption.
BL4: Urban Heat Island Mitigation	**Consistent.** The proposed project would incorporate landscaping throughout the project site. The proposed project would provide landscaping in accordance with City standards that would serve to reduce the urban heat island effect and would include the planting of shade trees.
Energy Control Measures	
EN2: Decrease Energy Use	**Consistent.** The project applicant would be required to conform to the energy efficiency requirements of CALGreen, also known as Title 24, which was adopted in order to meet an Executive Order in the Green Building Initiative to improve the energy efficiency of buildings through aggressive standards. Specifically, new development must implement the requirements of the most recent Building Energy Efficiency Standards, which would be the Title 24 standards in effect at the time that building permits are obtained. The 2019 Building Efficiency Standards went into effect on January 1, 2020.
Natural and Working Lands Control Measures	
NW2: Urban Tree Planting	**Consistent.** The proposed project would incorporate landscaping throughout the project site. The proposed project would provide landscaping in accordance with City standards that would serve to reduce the urban heat island effect and would include the planting of shade trees.
Source of control measures: Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan. April 19. Website: http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans. Accessed February 23, 2021.	

In summary, the proposed project would not conflict with any applicable measures under the 2017 Clean Air Plan after the implementation of Mitigation Measure (MM) AIR-1 (described in more detail in Impact 3(b)); therefore, the proposed project would be consistent with Criterion 2 after incorporation of mitigation.

Criterion 3

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

Summary

The proposed project would be consistent with all three criteria after the incorporation of MM AIR-1. Thus, the proposed project would not conflict with the 2017 Clean Air Plan. Therefore, impacts associated with conflicting with or obstructing implementation of the 2017 Clean Air Plan would be less than significant with mitigation.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

Less than significant impact with mitigation incorporated. This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. As discussed in Impact 3(a), the region is designated nonattainment for the federal and State ozone standards, the State PM_{10} standards, and the federal and State $PM_{2.5}$ standards. Potential impacts would result in exceedances of State or federal standards for NO_X or particulate matter (PM_{10} and $PM_{2.5}$). ROG emissions must also be evaluated because of their participation in the formation of airborne ozone.

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

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the CEQA Guidelines, the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the project's incremental effects would be cumulatively considerable. Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the proposed project would result in regional emissions that exceed the BAAQMD regional thresholds of

significance for construction and operations on a project level. The thresholds of significance represent the allowable amount of emissions each project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAQMD thresholds of significance on the project level would also not be considered to result in a cumulatively considerable contribution to regional air quality impacts.

The project's construction and operational emissions, which include both on- and off-site emissions, are evaluated separately below. Construction and operational emissions generated by the proposed project were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2. A detailed description of the assumptions used to estimate emissions and the complete CalEEMod output files are contained in Appendix A.

Construction Emissions

During construction, site grading and other earthmoving activities would generate fugitive dust (PM_{10} and $PM_{2.5}$). The majority of this fugitive PM dust would remain localized and be deposited near the project site. However, given the earthmoving activities associated with the proposed project and construction activities in general, there is a potential for impacts related to fugitive PM dust unless control measures are implemented to reduce the emissions from this source. Operation of the off-road construction equipment and on-road vehicle trips would also generate exhaust related criteria air pollutant emissions as discussed in more detail below.

Construction Fugitive Dust PM_{10} and $PM_{2.5}$

The BAAQMD does not recommend a numerical threshold for fugitive PM dust. Instead, the BAAQMD bases the determination of significance for fugitive PM dust on a consideration of the control measures to be implemented. If all appropriate emission control measures recommended by the BAAQMD are implemented for a project, then fugitive PM dust emissions during construction are considered to be properly mitigated and thus less-than-significant. During construction activities, the air pollution control measures, as outlined in MM AIR-1, shall be implemented to reduce fugitive PM dust during construction of the proposed project. With incorporation of this mitigation measure, short-term construction impacts associated with the generation of fugitive PM dust would be less than significant.

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

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

For the purpose of this analysis, construction of the proposed project was assumed to begin in July 2021 and conclude in September 2022. The proposed project is anticipated to be built in one phase, with earthmoving activities occurring for the entire site. If the construction schedule is delayed and starts later than July 2021, construction emissions would likely decrease because of improvements in

emissions and equipment technology, more stringent regulatory requirements, and turnover of older equipment from the fleet. The assumed construction schedule is provided in Table 4.

Table 4: Conceptual Construction Schedule

Construction Activity	Conceptual Construction Schedule		Working Days Per Week	Total Working Days
	Start Date	End Date		
Site Preparation	7/1/2021	7/5/2021	5	3
Grading	7/6/2021	7/13/2021	5	6
Building Construction	7/14/2021	8/4/2022	5	277
Paving	8/5/2022	8/18/2022	5	10
Architectural Coating	8/19/2022	9/1/2022	5	10
Source: Appendix A.				

The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA Guidelines. Complete construction assumptions are included in Appendix A.

The calculations of pollutant emissions from the construction equipment account for the type of equipment, horsepower and load factors of the equipment, along with the duration of use. Average daily construction emissions are compared with the significance thresholds in Table 5.

Table 5: Average Daily Construction Emissions (Unmitigated)

Parameter	Air Pollutants			
	ROG	NO_X	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
Construction Emissions—2021 (tons/year)	0.15	1.23	0.05	0.05
Construction Emissions—2022 (tons/year)	0.38	1.36	0.06	0.06
Total Construction Emissions (tons/year)	0.53	2.59	0.11	0.11
Total Emissions (lbs/year)	1,068	5,179	224	215
Average Daily Emissions (lbs/day)[1]	**3.49**	**16.93**	**0.73**	**0.70**
Significance Threshold (lbs/day)	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Parameter	Air Pollutants			
	ROG	NO_X	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
Notes: lbs = pounds ROG = reactive organic gases NO_X = oxides of nitrogen PM_{10} = particulate matter 10 microns in diameter $PM_{2.5}$ = particulate matter 2.5 microns in diameter [1] Calculated by dividing the total number of pounds by the total 306 working days of construction for the duration of construction (2021-2022). Calculations use unrounded totals. Totals may not sum due to rounding. Source of thresholds: Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. May. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed March 2021. Source of emissions: CalEEMod Output (see Appendix A).				

As shown in Table 5, the construction emissions from all construction activities are below the recommended thresholds of significance; therefore, construction of the proposed project would have a less-than-significant impact with respect to emissions of ROG, NO_X, exhaust PM_{10}, and exhaust $PM_{2.5}$. As previously discussed, the proposed project would implement MM AIR-1, which includes BMPs recommended by the BAAQMD, to reduce potential impacts related to fugitive PM dust emissions from use of the construction equipment. Therefore, project construction would have a less-than-significant cumulative impact after implementation of mitigation.

Operational Emissions

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

As previously discussed, the pollutants of concern include ROG, NO_X, PM_{10}, and $PM_{2.5}$. The project operational emissions for the respective pollutants were calculated using CalEEMod version 2016.3.2. Operational emissions were estimated for the year 2022, which is the earliest year when the proposed project would operate. The proposed project's long-term operational emissions were compared with the BAAQMD's operational thresholds of significance to evaluate potential impacts. The estimated annual emissions from project operations are presented in Table 6 and maximum daily emissions are presented in Table 7.

Table 6: Annual Operational Emissions (Unmitigated)

Emissions Source	Tons per Year			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area	0.17	0.00	0.00	0.00
Energy	0.00	0.04	0.00	0.00
Mobile (Motor Vehicles)	0.23	1.23	0.74	0.21
Estimated Annual Emissions	**0.40**	**1.27**	**0.75**	**0.21**
Thresholds of Significance	**10**	**10**	**15**	**10**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Emissions Source	Tons per Year			
	ROG	NO_X	PM_{10}	$PM_{2.5}$

Notes:
Calculations use unrounded totals. Totals may not sum due to rounding.
ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
Source: CalEEMod output (see Appendix A).

Table 7: Daily Operational Emissions (Unmitigated)

Emissions Source	Pounds per Day			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area	0.92	0.00	0.00	0.00
Energy	0.03	0.24	0.02	0.02
Mobile (Motor Vehicles)	1.40	6.92	4.27	1.18
Estimated Daily Emissions	**2.34**	**7.16**	**4.29**	**1.20**
Thresholds of Significance	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
Calculations use unrounded totals. Totals may not sum due to rounding.
ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
[1] Existing emissions from the project site were subtracted from the proposed project's emissions to calculate the net change in long-term operational emissions, which were then compared with the BAAQMD's thresholds of significance.
The highest daily project emissions occurred in the winter run for NO_X, PM_{10}, and $PM_{2.5}$. The highest ROG emissions occurred in the summer run.
Calculations use unrounded results.
Source: CalEEMod output (see Appendix A).

As shown in Table 6 and Table 7, the proposed project would not result in operational-related air pollutants or precursors that would exceed the BAAQMD's thresholds of significance, indicating that ongoing project operations would not be considered to have the potential to generate a significant quantity of air pollutants. Therefore, project operations would have a less than significant cumulative impact.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. This impact evaluates the potential for the project's construction and operational emissions to expose sensitive receptors to substantial pollutant concentration. A sensitive receptor is defined by the BAAQMD as the following: "[f]acilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as

children, the elderly, and people with illnesses. Examples include schools, hospitals, and residential areas." Existing sensitive receptors located closest to the project site in each direction are listed below.

- Existing single-family residences located northeast from the project site. The closest residence is located on Darlyn Way, approximately 300 feet to the northwest.
- Existing multi-family residences located northwest of the project site's northern boundary; the closest of these is the multi-family residence located on the southeast corner of Tuxhorn Drive and Pebblecreek Drive, approximately 490 feet northwest of the project site.
- A single-family residence located approximately 450 feet west of the project site.

As a light industrial development project, the proposed project itself would not be considered a sensitive receptor once operational.

Construction

Construction Fugitive Dust

Construction activities associated with development of the proposed project would include site preparation, grading, building construction, paving, and architectural coating. Generally, the most substantial air pollutant emissions would be dust generated from site grading. If uncontrolled, these emissions could lead to both health and nuisance impacts. Construction activities would also temporarily create emissions of equipment exhaust and other air contaminants.

The BAAQMD does not recommend a numerical threshold for fugitive, dust-related PM emissions. Instead, the BAAQMD bases the determination of significance for fugitive dust on a consideration of the control measures to be implemented. If all appropriate emissions control measures recommended by the BAAQMD are implemented, then fugitive dust emissions during construction are not considered significant. MM AIR-1 includes the fugitive dust control measures recommended by the BAAQMD, thereby reducing this impact to less than significant.

Asbestos

Structures to be demolished sometimes contain asbestos-containing materials (ACM); however, no demolition is proposed at part of the proposed project.

Projects that would include soil disturbance in an area known to include rock formations containing naturally occurring asbestos would have the potential to exposure receptors to asbestos if uncontrolled. The Department of Conservation, Division of Mines and Geology published a guide for generally identifying areas that are likely to contain naturally occurring asbestos. The map associated with this guide indicates that there are several locations within Sonoma County that are likely to contain naturally occurring asbestos.[18] However, a review of the map containing areas more likely to have rock formations containing naturally occurring asbestos in California indicates that there is no

[18] Department of Conservation, Division of Mines and Geology. 2000. A General Location Guide for Ultramafic Rocks in California—Areas More likely to Contain Naturally Occurring Asbestos. August. Website: http://www.conservation.ca.gov/cgs/minerals/hazardous_minerals/asbestos. Accessed March 2021.

asbestos in the immediate project area.[19] Therefore, it can be reasonably concluded that the proposed project would not expose sensitive receptors to naturally occurring asbestos. Impacts would be less than significant.

Construction Diesel Particulate Matter

The ARB has identified DPM as a carcinogenic air contaminant. Major sources of DPM include off-road construction equipment and heavy-duty delivery truck and worker activities.

Construction activities have the potential to generate DPM emissions related to the number and types of equipment typically associated with construction. Off-road, heavy-duty diesel equipment used for site grading, paving, and other construction activities result in the generation of DPM. However, construction would be temporary and would occur over a relatively short duration in comparison to the operational lifetime of the project. In addition, operation of construction equipment is regulated by federal, State, and local regulations, and would occur intermittently throughout the course of a day over the course of the construction so the likelihood that any one sensitive receptor would be exposed to high concentrations of DPM for any extended period of time would be low. As a project design feature, the proposed project would limit the use of diesel fueled off-road construction equipment. Specifically, the following measures, would be applied during construction of project and have been included as part of the proposed project as project design features:

- Substitute electrified equipment for diesel- and gasoline-powered equipment where practical.
- Use alternative fuels for construction equipment on-site, where feasible, such as compressed natural gas, liquefied natural gas, propane, or biodiesel.
- Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.

Considering the limited use of diesel fueled equipment, the potential health hazards resulting from construction-related DPM exposure would be less than significant.

Construction

Project-Specific Operational Toxic Air Pollutants

The project is a self-storage development that is not expected to have on-site sources of TACs during operation. As described in the W-Trans Transportation Analysis, the project is expected to generate an average of 161 trips per day, including 11 trips during the weekday AM peak-hour and 18 trips during the PM peak-hour.[20] The proposed project would generate vehicle trips primarily from employees, customers, and other visitors traveling to and from the project site, which would primarily be generated by passenger vehicles. Because nearly all passenger vehicles are gasoline-fueled, the proposed project would not generate a significant amount of DPM emissions during operation.

[19] United States Geological Survey (USGS). 2011. Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California. Website: https://pubs.usgs.gov/of/2011/1188/. Accessed March 2021.

[20] W-Trans. 2021. Focused Traffic Study for the Canine Companions CEDC Expansion Project. March 9.

Therefore, the proposed project would not result in significant health impacts to nearby sensitive receptors during operation.

Carbon Monoxide Hotspot

Localized high levels of CO (CO hotspot) are associated with traffic congestion and idling or slow-moving vehicles. The BAAQMD recommends a screening analysis to determine if a project's operation has the potential to contribute to a CO hotspot. The screening criteria identify when site-specific CO dispersion modeling is not necessary. The proposed project would result in a less than significant impact to air quality for local CO if the following screening criteria are met:

- **Screening Criterion 1**: The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
- **Screening Criterion 2:** The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- **Screening Criterion 3:** The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The project-specific transportation analysis identified anticipated trip generation, evaluated VMT and adequacy of site access for all modes, review safety issues, and determined parking needs.[21] As discussed above, the proposed project is consistent with the existing zoning and General Plan land use designations and therefore is not anticipated to generate trip volumes or land use types that the existing roadway network or applicable congestion management plan has not accounted for. As identified in the project-specific transportation analysis, the SCTA prepared a draft screening map for the City of Santa Rosa that shows the project site to be within a screened area and therefore the proposed project would have a less-than-significant VMT impact associated with employee travel. As described in the W-Trans Transportation Analysis, the proposed project is expected to generate an average of 161 trips per day, including 11 trips during the weekday AM peak-hour and 18 trips during the PM peak-hour.[22] This level of peak-hour trips is substantially less than BAAQMD's second and third screening criteria of 44,000 vehicles per hour and 24,000 vehicles per hour, respectively. Lastly, the proposed project would not be located in a vertically- or horizontally-limited mixing zone. The proposed project would not result in an increase of traffic volumes at affected intersections to more than 44,000 vehicles per hour and would not increase traffic volumes at affected intersections to more than 24,000 where vertical or horizontal mixing is substantially limited; accordingly, the proposed project is consistent with the screening criteria. The proposed project's impact related to air quality for local CO emissions would be less than significant.

[21] W-Trans. 2021. Focused Traffic Study for the Canine Companions CEDC Expansion Project. March 9.
[22] Ibid.

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

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

Odors can cause a variety of responses. The impact of an odor often results from interacting factors such as frequency (how often), intensity (strength), duration (time), offensiveness (unpleasantness), location, and sensory perception. Two circumstances have the potential to cause odor impacts:

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

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

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

Projects that would site an odor source or a receptor farther than the applicable screening distance, shown in Table 8 below, would not likely result in a significant odor impact.

Table 8: Odor Screening Distances

Land Use/Type of Operation	Project Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile

Land Use/Type of Operation	Project Screening Distance
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Source: Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. May. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed March 2021.	

Project Construction

Diesel exhaust and VOCs would be emitted during construction of the proposed project, which are objectionable to some; however, emissions would disperse rapidly from the project site and therefore would not create objectionable odors affecting a substantial number of people. As such, construction odor impacts would be less than significant.

Project Operation

Project as an Odor Generator

Land uses typically associated with odors include wastewater treatment facilities, waste disposal facilities, or agricultural operations. The project involves the construction and operation of a CEDC building and veterinary clinic and does not contain land uses typically associated with objectionable odors. During operation of the project, odors would primarily consist of vehicles traveling to and from the site. These occurrences would not produce significant odors; therefore, operational impacts would be less than significant.

Project as a Sensitive Receptor

The project involves the construction and operation of a CEDC building and veterinary clinic and would not have the potential to place sensitive receptors near existing or planned sources of odors. Operational odor impacts in terms of the project site as an odor sensitive receptor would be less than significant.

Mitigation Measures

MM AIR-1 During construction activities, the following Best Management Practices (BMPs) shall be implemented:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks shall be paved as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City of Santa Rosa regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The Bay Area Air Quality Management District (BAAQMD) phone number shall also be visible to ensure compliance with applicable regulations.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.4 Biological Resources *Would the project:*				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States 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 or United States Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☒	☐	☐

Environmental Evaluation

This section evaluates potential effects on biological resources that may result from project implementation. The analysis is based on the following references materials provided in Appendix B:

- Results from the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database searches.

- 2007 United States Fish and Wildlife Service (USFWS) Programmatic Biological Opinion (PBO) for United States Army Corps of Engineers (USACE) Permitted Projects that Affect the California Tiger Salamander and Three Endangered Plant Species on the Santa Rosa Plain, California.
- 2020 Reinitiation of Formal Consultation on Issuance of Clean Water Act Section 404 Permits by the USACE on the Santa Rosa Plain, Sonoma County, California.
- Botanical Survey Memo prepared on May 11, 2020, and Rare Plant Assessment prepared in May 2021 by Prunuske Chatham, Inc.
- California Tiger Salamander Site Assessment and USFWS Progammatic Biological Opinion Evaluation prepared in September 2018 and revised in June 2021, by Prunuske Chatham, Inc.
- Jurisdictional Delineation Report prepared in February 2020, by Prunuske Chatham, Inc.
- USFWS Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain.
- USFWS and CDFW Guidance on Site Assessment and Field Surveys for Determine Presence or Negative Findings of the California Tiger Salamander.

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?

Less than significant with mitigation incorporated. For the purpose of this analysis, special-status species refers to all species formally listed as threatened and/or endangered under the following:

- Federal Endangered Species Act (FESA) or the California Endangered Species Act (CESA);
- California Species of Special Concern, designated as Fully Protected by the CDFW and given a CNPS rank[23] or designated as special-status by city, county, or other reginal planning documents:
  - **Rank 1A**: Plants presumed extirpated in California and either rare or extinct elsewhere
  - **Rank 1B**: Plants Rare, Threatened, or Endangered in California and elsewhere
  - **Rank 2**: Plants Rare, Threatened, or Endangered in California, but more numerous elsewhere
  - **Rank 3**: Plants about which more information is needed
  - **Rank 4**: Watch List: Plants of limited distribution

Federal and State-listed threatened and/or endangered species are legally protected under FESA/CESA. The designated special-status species listed by the CNPS have no direct legal protection

[23] All plants appearing on the CNPS List 1 or 2 are considered to meet the CEQA Guidelines Section 15830 criteria. While only some of the plants ranked 3 and 4 meet the definitions of threatened or endangered species, the CNPS recommends that all Rank 3 and Rank 4 plants be evaluated for consideration under CEQA.

but require an analysis of significance of potential impacts under CEQA Guidelines. Special-status plant and wildlife species typically occur in undeveloped areas. Although it is less likely, it is also possible for them to occur within developed areas.

A site visit was conducted by FirstCarbon Solutions (FCS) Senior Biologist, Bernhard Warzecha, on December 8, 2020, from 10:00 a.m. to 2:00 p.m. The site visit was conducted to confirm existing conditions on the project site as identified by the Prunuske Chatham, Inc. (PCI) botanical memo, CTS assessment, and Jurisdictional Delineation Report. The project site is surrounded by light industrial and residential development in all directions. Patches of vacant fields are located to the north and southeast of the project site. The Colgan Creek is located directly to the northwest and was dry during FCS's field survey. However, the project site is separated from Colgan Creek and associated riparian habitats by an approximately 6-foot-tall chain link fence.

There are two habitat types present on-site: managed non-native annual grassland, and a seasonal wetland located within the eastern area of project site (Exhibit 3). Much of the project site is composed of non-native annual grasslands, dominant perennial vegetation observed within this area at the time of FCS's survey included Harding grass*,* fennel *(Foeniculum vulgare)*, and radish *(Raphanus sp.)*. Dominate vegetation observed within the seasonal wetland at the time of FCS's survey included Italian rye grass, barley (*Hordeum sp.)*, oats (*Avena sp*.), soft chess (*Bromus hordeaceous*), and ripgut brome.

Dominate vegetation observed during Prunuske Chatham's botanical survey included soft chess, Mediterranean barley, and Italian rye. Other species included curly dock, ripgut brome, cutleaf geranium, brome fescue, bindweed, wild oat, spinyfruit buttercup, and Harding grass. The only native species observed were occasional small patches of meadow barley, creeping spikerush, and individuals of miniature lupine.

Special-status Plant Species

A plant's potential to occur on the project site was based on presence of suitable habitats, soil types, and occurrences recorded by the CNPS Inventory of Rare and Endangered Plants of California and CNDDB within the Santa Rosa quadrangle, and eight surrounding quadrangles.[24] Based on a database search of the CNDDB and CNPS Inventory of Rare and Endangered Plants of California, a total of 28 special-status plant species have been recorded with potential to occur within the region. Because of previous development and current disturbances at the project site, and/or lack of specific suitable habitat types and conditions (including edaphic conditions such as serpentine soils), 18 of the 28 special-status plant species were determined to have no potential to occur and are therefore excluded from further analysis (see Table 1; Appendix B for a species-specific discussion of all 28 special-status plant species). Ten special-status plant species and CNPS sensitive species were determined to have at least a low potential to occur on-site based on the presence of potentially suitable habitat. These 10 species are addressed in more detail below:

[24] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.

Bent-flowered Fiddleneck

Bent-flowered fiddleneck (*Amsinckia lunaris*) is ranked as a 1B.2 by CNPS (rare or endangered in California and elsewhere; fairly threatened in California) and is found in cismontane woodland, valley and foothill grasslands, and coastal bluff scrub. The nearest occurrence is located 2 miles north of the project site.[25] This species usually blooms between March and June, dependent on seasonal conditions. This species was not observed during PCI's botanical surveys (April 23, 2020; March 31, 2021; April 15, 2021; and April 30, 2021). PCI's botanical surveys determined that this species is absent from the project site. The project site lacks gravelly slopes or serpentine soils, which precludes presence of this species.[26]

Sonoma Sunshine

Sonoma sunshine (*Blennosperma bakeri*) is federally listed as endangered and State-listed as endangered. This species is also ranked as a 1B.1 by CNPS (rare or endangered in California and elsewhere; seriously threatened in California) and is found within vernal pools, wet grasslands, and swales. This species usually blooms between March and April, dependent on seasonal conditions. There have been multiple occurrences of this species within 5 miles.[27] However, this species was not observed during PCI's botanical surveys (April 23, 2020; March 31, 2021; April 15, 2021; and April 30, 2021), but was observed at a reference site. PCI's botanical surveys determined that this species is absent from the project site because the seasonal wetland on-site does not provide suitable habitat. In addition, The project site hydrology is very limited coupled with a dense cover of non-native species precludes presence of this species.[28]

Dwarf Downingia

Dwarf downingia (*Downingia pusilla*) is ranked as a 2B.2 by the CNPS (rare, threatened, or endangered in California but more common elsewhere) and is found within vernal lake and pool margins and mesic sites. Several occurrences have been documented within 2.5 miles of the project site.[29] This species usually blooms between March and May, dependent on seasonal conditions. This species was not observed during PCI's botanical surveys (April 23, 2020; March 31, 2021; April 15, 2021; and April 30, 2021). PCI's botanical surveys determined that this species is absent from the project site. The seasonal wetland on-site does not provide suitable habitat for this species given the density of non-native species and limited hydrology.[30]

Congested-headed Hayfield Tarplant

Congested-headed hayfield tarplant (*Hemizonia congesta* ssp*. congesta*) is ranked as a 1B.2 by CNPS and is found in valley and foothill grasslands and coastal scrub habitats. Several occurrences of this species have been documented between 3 and 5 miles northwest of the project site.[31] This species

[25] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.
[26] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue, City of Santa Rosa, California.
[27] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.
[28] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue City of Santa Rosa, California.
[29] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.
[30] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue City of Santa Rosa, California.
[31] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020

usually blooms between April and November, dependent on seasonal conditions. This species was not observed during PCI's botanical surveys (April 23, 2020; March 31, 2021; April 15, 2021; and April 30, 2021). PCI's botanical surveys determined that this species is absent from the project site. The grassland present on-site is highly disturbed and nearly devoid of native species.[32]

Burke's Goldfields

Burke's goldfields (*Lasthenia burkei*) is federally listed as endangered and State-listed as endangered. This species is also ranked as a 1B.1 by CNPS and is found within vernal pools and wetlands. Multiple occurrences of this species have been documented within 5 miles of the project site.[33] This species usually blooms between April and June, dependent on seasonal conditions. This species was not observed during PCI's botanical surveys (April 23, 2020; March 31, 2021; April 15, 2021; and April 30, 2021). PCI's botanical surveys determined that this species is absent from the project site because the seasonal wetland on-site does not provide suitable habitat for this species given the density of non-native species and limited hydrology.[34]

Legenere

Legenere (*Legenere Limosa*) is ranked as a 1B.1 by CNPS and is found within vernal pools and wetlands. This species has been documented 2.25 miles west of the project site.[35] This species usually blooms between March and May, dependent on seasonal conditions. This species was not observed during PCI's botanical surveys (April 23, 2020; March 31, 2021; April 15, 2021; and April 30, 2021). PCI's botanical surveys determined that this species is absent from the project site because the seasonal wetland on-site does not provide suitable habitat for this species given the density of non-native species and limited hydrology.[36]

Sebastopol Meadowfoam

Sebastapol meadowfoam (Limnanthes vinculans) is federally listed as endangered and State-listed as endangered. This species is also ranged as a 1B.1 by CNPS and is found in vernal pools, wetlands, meadows and seeps, and valley and foothill grasslands. Multiple occurrences of this species have been documented within 5 miles of the project site.[37] Sebastopol meadowfoam usually blooms between April and May, dependent on seasonal conditions. This species was not observed during PCI's botanical surveys (April 23, 2020; March 31, 2021; April 15, 2021; and April 30, 2021). PCI's botanical surveys determined that this species is absent from the project site. The seasonal wetland on-site does not provide suitable habitat for this species given the density of non-native species and limited hydrology. The site is also near the upper end of this species known elevation range.[38]

[32] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue City of Santa Rosa, California.
[33] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.
[34] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue City of Santa Rosa, California.
[35] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.
[36] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue City of Santa Rosa, California.
[37] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.
[38] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue City of Santa Rosa, California.

Baker's Navarretia

Baker's navarretia (*Navaretia leucocephala* spp. bakeri) is ranked as a 1B.1 by CNPS and is found within meadows and seeps, valley and foothill grasslands, vernal pools, and wetlands. Several occurrences of this species have been documented within 3.5 miles of the project site.[39] Baker's navarretia usually blooms between April and July, dependent on seasonal conditions. This species was not observed during PCI's botanical surveys (April 23, 2020; March 31, 2021; April 15, 2021; and April 30, 2021). PCI's botanical surveys determined that this species is absent from the project site because the seasonal wetland on-site does not provide suitable habitat for this species given the dense cover of non-native annual grasses, limited hydrology, and the lack of typical associates for this taxa.[40]

Two-forked Clover

Two-forked clover (*Trifolium amoenum*) is federally listed as endangered and is ranked as a 1B.1 by CNPS. This species is found within coastal bluff scrub and valley and foothill grasslands. The nearest occurrence of this species is 2 miles northwest of the project site.[41] Two-forked clover usually blooms between April and June, dependent on seasonal conditions. This species was not observed during PCI's botanical surveys (April 23, 2020; March 31, 2021; April 15, 2021; and April 30, 2021). PCI's botanical surveys determined that this species is absent from the project site because on-site habitat is not suitable for this species given the highly disturbed grassland present on-site.[42]

Saline Clover

Saline clover (*Trifolium hydrophilum*) is ranked as a 1B.2 by CNPS and is found within marshes and swamps, valley and foothill grasslands, vernal pools, and wetlands. Nearest occurrence of this species is less than a mile west of the project site.[43] Saline clover usually blooms between April and June, dependent on seasonal conditions. This species was not observed during PCI's botanical surveys (April 23, 2020; March 31, 2021; April 15, 2021; and April 30, 2021). PCI's botanical surveys determined that this species is absent from the project site because the seasonal wetland on-site does not contain alkaline soils, which precludes this species.[44]

Impact Analysis for Special-status Plant Species

The project proposes to grade and develop the grassland and wetland habitats on-site. However, no special-status species occur on-site, and no suitable habitat for special-status vernal pool species exists. Therefore, any potential project-related impacts to special-status plant species would be less than significant, and no mitigation is required.[45]

[39] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.
[40] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue City of Santa Rosa, California.
[41] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.
[42] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue City of Santa Rosa, California.
[43] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.
[44] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue City of Santa Rosa, California.
[45] Prunuske Chatham, Inc. (PCI). 2021. Rare Plant Assessment. 2965 Dutton Avenue City of Santa Rosa, California.

Special-status Wildlife Species

The potential for wildlife to occur on the project site was based on presence of suitable habitats and occurrences recorded by the CNDDB within the Santa Rose quadrangle, and eight surrounding quadrangles.[46] Eleven special-status wildlife species have been recorded with the potential to occur within greater vicinity of the project site, based on the CNDDB database search. Seven of the 11 special-status wildlife species were determined to have no potential to occur due to absence of suitable habitat and/or site-specific habitat conditions as provided in Table 2; Appendix B, including a species-specific discussion of all 11 special-status wildlife species, and are therefore excluded from further analysis. Four special-status wildlife species were determined to have at least a low potential to occur on-site or within disturbance distance: California tiger salamander and California red-legged frog (*Rana draytonii);* nesting birds, including nesting Cooper's hawk (*Accipiter cooperii)* and white-tailed kite (*Elanus leucurus).* These four species are addressed in more detail below. (See Table 2; Appendix B for a species-specific discussion of all 11 special-status wildlife species, including species' status, required habitat, and potential to occur within the project site).

Wildlife species observed during FCS's site visit included: American crow (*Corvus brachyrhynchos)*, turkey vulture (*Cathartes aura)*, house sparrow (*Passer domesticus)*, black phoebe (*Sayornis nigricans)*, western meadowlark (*Sturnella neglecta)*, and hawk (*Buteo spp.)*. In addition, scrub jay (*Aphelocoma californica)*, California quail (*Callipepla californica)*, and California thrasher (*Toxostoma redvivum)* were observed within Colgan Creek.

California Tiger Salamander

The project site is located within the known range of the Sonoma County Distinct Population Segment of CTS and within 1.3 miles of known or extirpated breeding pools.[47] This population is federally listed as endangered and State-listed as threatened. The project site also lies within the USFWS designated Critical Habitat for this species. The following analysis is based on the findings of the standalone California Tiger Salamander Site Assessment prepared by PCI, and made part of this Draft IS/MND (Appendix B).[48]

The project site is located along the eastern edge of the Llano Crescent–Stony Point Core Area; this includes one of three core areas that have been identified within the Santa Rosa Plain:

> "Core areas comprise the heart of the species historical (and current) range and represent central blocks of contiguously occupied habitat that function to allow for dispersal, genetic interchange between populations, and metapopulation dynamics."

The project site is located along the eastern edge of this core area and not within any conservation areas or along any CTS corridors identified on either USFWS Recovery Plan Figure 7, Santa Rosa Plain Conservation Strategy–Llano Conservation Area or Figure 8, Santa Rosa Plain Conservation Strategy–

[46] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.

[47] California Department of Fish and Wildlife (CDFW). 2005. Santa Rosa Plain Conservation Strategy, Figure 2.

[48] Prunuske Chatham, Inc. (PCI). 2021. California Tiger Salamander Site Assessment 2965 Dutton Avenue, City of Santa Rosa, California. June.

Stony Point Conservation Area.[49] The northern extent of the Stony Point Conservation Area is located approximately 1.5 miles south of the project site, and the Llano Crescent Conservation Area is located approximately 1 mile west. Neither maps illustrate migration corridors towards the proposed project site.

The nearest documented breeding occurrence for CTS is approximately 0.4 mile to the northwest of the project site at Southwest Community Park off Hearn Avenue (Occurrence Number 483). Historically, a single pond at the site supported successful CTS breeding.[50] However, the areas surrounding the pond have become developed and suitable upland habitat is limited. Surveys of Southwest Community Park have been completed since 1998, CTS larvae were found to be present until 2010.[51] No CTS larvae were documented at the pond in 2011-2017 and they are believed to be extirpated from the site.[52]

To the northwest of the project site, within 0.7 mile, there is a drainage ditch at the corner of Hearn Avenue and Stony Point Road that supported CTS breeding in 2002-2003 (Occurrence Number 653). The site is surrounded by development and the ditch is not a viable long-term breeding site. The site still appears to be undeveloped.[53] There was an additional potential breeding pond noted approximately 0.75 mile from the site, but it is not confirmed (see Occurrence Number 787). This site is on the east side of Stony Point Road and to the west of Elise Allen High School. Migration from Occurrence Number 653 to the proposed project site would be similar to the conditions described for the extirpated pond at Southwest Community Park, since the 2002-2003 breeding site is located west of the community park. Migration routes from Occurrence Number 787 to the proposed project site is limited with the presence of Elsie Allen High School and several subdivisions and an industrial site. The Colgan Creek Flood Control Channel is a migration barrier from both these sites to the project site.

One additional breeding site is reported to the southwest (1 mile) and one to the west (1.25 miles) of the project site (Occurrence Numbers 232 and 650). Each breeding pond is outside or at the edge of the documented dispersal range for CTS and are located to the west of Stony Point Road.

In addition to the reported occurrences of breeding sites within 1.3 miles of the project site, there are nine other reported occurrences of adult CTS in the area. These sightings are reported from 2001 through 2010. All but one of the reported occurrences are located west, northwest, or southwest of the project site. A single occurrence (Occurrence Number 788, 0.97 miles) is located to the south. No occurrences are noted east of the project site, as illustrated on Figure 2 of the California Tiger Salamander Site Assessment.

[49] United States Fish and Wildlife Service (USFWS). 2005. Santa Rosa Plain Conservation Strategy Final. December 1, 2005. United Sates Fish and Wildlife Service, Pacific Southwest Region, Sacramento, CA.
[50] Cook, D.G. and J. Meisler. 2016. California Tiger Salamander Larval Density and Survival at Natural and Constructed Breeding Pools, Sonoma County, CA. January 2016. Prepared for U.S. Fish and Wildlife Service
[51] Cook, D. 2018 and 2021. Personal communication between Jennifer Michaud, Prunuske Chatham, Inc. and Dave Cook, Sonoma County Water Agency
[52] Cook, D. 2021. Personal communication between Jennifer Michaud, Prunuske Chatham, Inc. and Dave Cook, Sonoma County Water Agency
[53] Google Earth. 2018. Google Earth application

PCI's California Tiger Salamander Site Assessment (Table 1 and Figure 3; Appendix B) provides a summary of reported occurrences of CTS within 1.3 miles of the project site. These occurrences are also outlined in the table below.

Table 9: Reported Occurrences of the California Tiger Salamander within 1.3 Miles of the Project Site

Occurrence Number	Location/Habitat	Species Description/Site Conditions	Distance to Project Site
Breeding Ponds/Larval Observations			
483	Southwest Community Park/pond surrounded by housing, grassland and park	Adults and larvae: CTS larvae last seen in spring 2010, no CTS found between 2011-2017, breeding pond assumed to be extirpated based on monitoring data and site development	0.4 mile to northwest
653	intersection of Hearn and Stony Point Road/remnant wetland	Larvae caught in ditch; males observed (2002-2003)	0.7 mile to northwest
787	East side of Stony Point Road, 0.2 mile north of Bellevue Road/annual grassland with pond next door(potential breeding site)	Two males observed in 2002	0.75 mile to the west
232	Southwest of intersection with Stony Point Road and Ludwig Avenue/grassland and breeding site	Unknown captured in 1992; larvae captured in 2006; west of Stony Point Road	1 mile to the southwest
650	Between Ludwig Avenue and Yuba Avenue/grassland with vernal pools	Adults and larvae observed in 2001-2002; used for breeding; west of Stony Point Road	1.25 miles to west
Adult Sightings			
1105	Hearn Avenue between Westwood Drive and Dutton Meadow Road	Gravid female found along road, December 2003	0.4 mile to the northwest
1243	Maureen Drive, 1 mile west of Morgan Creek Street/historically grassland	Adult detected in 2006, site has since been developed	0.3 mile to the west
786	0.15 mile west of Dutton Meadows Road and 0.3 mile north of Bellevue Road/ grassland within floodplain	Adult females observed in 2002 and 2007, site planned for development in 2008, California tiger salamander relocated from site	0.35 mile to the west

Occurrence Number	Location/Habitat	Species Description/Site Conditions	Distance to Project Site
725	West of Dutton Meadows Road and 0.3 mile north of Bellevue Road/Colgan Creek Flood Control Channel/ pasture with seasonal wetland	One adult observed in pit fall traps in 2002, another adult observed in 2002; no California tiger salamander larvae observed in seasonal wetland on-site in 2002	0.4 mile to the southwest
789	Along west side of Primrose Avenue/ grassland used for motor cross	Male observed in 2003	0.75 mile to the southwest
790	0.2 mile east of Primrose Avenue and 0.4 mile south of Bellevue Road/grassland used for motocross	Males observed in 2003	0.8 mile to the southwest
649	Primrose Avenue/grasslands and wetland	Dead adult found along rural road in 2001	1 mile to the southwest
788	South side of West Robles Road/grassland	Males and females observed in 2002	0.95 mile to the south
1134	North side of Todd Road/grassland	Males and females caught in pit fall traps in 2001	1.5 miles to the southwest

In summary, PCI's "California Tiger [sic] Site Assessment" determines that the project site is located within the range of this species' protected Distinct Population Segment (page 5), that it is within federally designated CTS Critical Habitat, and specifically within the Llano Crescent–Stony Point Core Area (page 5). Additionally, the site assessment cites several potential breeding ponds within dispersal distance; however per PCI's site assessment these ponds are either extirpated (Occurrence Number 483), not a viable long-term breeding site (Occurrence Number 653), unconfirmed (Occurrence 787), have limited migration routes to the project site (Occurrence Numbers 653 and 787), or are outside or at the edge of the documented mobility distance for CTS (Occurrence Numbers 232 and 650) (e.g., pages 8 & 9). The Assessment concludes, "Historically, the site may have supported CTS. However, the project site is isolated from known breeding populations with partial and full migration barriers between the project site and potential breeding ponds. The project site is also located in area of high density development; it does not provide upland habitat, because CTS migration to the site is extremely limited. The project site supports a seasonal wetland, but the wetland does not provide suitable breeding habitat." (page 19, Conclusions).

Based on the California Tiger Salamander Site Assessment, the nearest potential breeding site is located approximately 0.75 mile (3,960 feet) from the project site. The PBO requires a 1:1 mitigation ratio for projects sites that are greater than 2,200 feet and within 6,864 feet of a breeding site. As such, the proposed project would result in a potentially significant impact to California tiger salamander dispersal/migration habitat. The project applicant, in consultation with the USFWS and CDFW, would be required to provide compensatory mitigation based on the ratios described in the 2020 PBO. This measure is summarized in MM BIO-1a.

California Red-legged Frog

The California red-legged frog (CRLF) is listed under FESA as threatened and is a California Species of Special Concern. This species is found in lowlands and foothills in or near permanent sources of water with deep pooling features; dense, shrubby, or emergent riparian vegetation. The CRLF requires 11–20 weeks of permanent water for larval development and must have access to aestivation habitat. The nearest occurrence is located approximately 3.5 miles east of the project site.[54] The CRLF have been reported to disperse up to 1.7 miles from breeding habitat during following the onset of fall/winter rainfall.[55] The project site is not located within the potential range of CRLF; moreover, Colgan Creek does not have any documented occurrences of CRLF. The combination of factors listed above results in the conclusion that CRLF is unlikely to occur on the project site.

Nesting Birds: Cooper's Hawk and White-tailed Kite

The trees present within the southwestern boundary of the project site and the riparian vegetation of the adjacent Colgan Creek provide nesting habitat for bird species protected under the Migratory Bird Treaty Act (MBTA) and Fish and Game Code. These species include white-tailed kite, Cooper's hawk, and common songbirds (passerine birds). Additionally, grassland on-site and to the northwest provides potential foraging habitat for these species. Construction activities could disturb nesting and breeding birds in trees and shrubs within and around the construction site. Potential impacts on special-status and migratory birds that could result from construction and operation of the proposed project include destruction of eggs or occupied nests, mortality of young, and abandonment of nests with eggs or young birds prior to fledging. If MBTA and/or Fish and Game Code protected species' nests are present, impacts to these species would be significant. MM BIO-1b would require pre-construction surveys and modification of construction activities to avoid disturbance of any active nests, including active nests of special-status bird species, if present, which would reduce impacts to migratory and nesting birds and raptors protected under the MBTA and Fish and Game Code (including special-status species such as Cooper's hawk and white-tailed kite) to less than significant levels.

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 or United States Fish and Wildlife Service?

Less than significant impact with mitigation incorporated. There is no riparian habitat on the project site. Therefore, the proposed project would have no impact to riparian habitat. However, the project site would result in the fill of a seasonal wetland, supporting a naturally occurring seasonal wetland community, including both non-native and native plants. Wetland communities are generally considered sensitive communities. Therefore, loss of the entire seasonal wetland community of the identified wetland on-site would constitute a significant impact. However, with implementation of MM BIO-2, specifically the purchase of wetland mitigation credits at a 1:1 ratio or

[54] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed November 30, 2020.

[55] Fellers and Kleeman, 2007. California Red-Legged Frog (Rana Draytonii) Movement and Habitat Use." Journal of Herpetology Vol. 41, No. 2, pp. 276-286

as determined by the RWQCB to ensure no net loss and function, higher-quality wetland communities will be preserved in-perpetuity; and any potential impact to the seasonal wetland community on-site will be reduced to a less-than-significant level.

c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than significant impact with mitigation incorporated. Analysis for this checklist question is based on results from PCI's Jurisdictional Delineation Report.[56] The seasonal wetland on-site consists of a small depression feature approximately 0.14 acre in size, as shown in Exhibit 3. The feature is approximately 70 feet wide and 120 feet long, with uniform flat topography, and is located between two elevated berms. Dominant vegetation observed within the wetland during delineation included common spikerush and curly dock with additional cover including bristly ox-tongue (*Helminthotheca echioides)*, Italian rye grass, and soft chess. Soils observed in both the wetland and upland areas were clay in texture. Wetland soils were dark in color (mostly 10YR 3/2) and contained redoximorphic mottles (mostly 10YR 5/6), comprising 5 percent or more of soil volume. Wetland hydrology was indicated by oxidized rhizospheres along root channels.

While PCI's Jurisdictional Delineation Report does not offer an evaluation or proposal of potential federal or State jurisdiction, it is assumed that the seasonal wetland is at a minimum jurisdictional as a water of the State pursuant the Porter-Cologne Water Quality Control Act and regulated by the RWQCB, i.e., it is a State-protected wetland. Fill of the wetland as proposed would constitute a substantial adverse effect as fill and construction of the proposed project would remove 100 percent wetland area and function. However, with implementation of MM BIO-2, specifically the purchase of wetland mitigation credits at a 1:1 ratio or as determined by the RWQCB, higher-quality created or restored seasonal wetland area will be preserved and managed for habitat value in-perpetuity, and therefore the adverse effect of the proposed wetland fill will be reduced to a less-than-significant level.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

Less than significant impact. FCS Biologists evaluated the project site for evidence of a wildlife movement corridor during the biological resources survey. The site is surrounded by a mix of industrial and residential developments and situated in a semi-urban landscape with moderate amounts of traffic from local industrial operations. The project site is separated from Colgan Creek and its riparian corridor by an approximately 6-foot-tall chain link fence, reducing the project site's use as a corridor for all non-volant species larger than approximately 2 inches. The project site is not part of or within a wildlife movement corridor and project-related impacts would be less than significant.

[56] Prunuske Chatham, Inc. (PCI). 2020. Jurisdictional Delineation Report. 2965 Dutton Avenue City of Santa Rosa, California. February

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

Less than significant impact with mitigation incorporated. Chapter 17-24, "Trees" of the Santa Rosa City Code (Tree Ordinance) regulates the protection of certain trees on public and private properties within the city limits. The Tree Ordinance defines a "heritage tree" as: valley oak (*Quercus lobata*), blue oak (*Q. douglasii*), or buckeye (*Aesculus californica*) 19 inches circumference at breast height (measured at 4.5 feet above ground or 6 inches diameter at breast height [DBH]) or greater; madrone (*Arbutus menziesii*), 38 inches circumference (12 inches DBH) or greater; coast live oak (*Q. agrifolia*), black oak (*Q. kelloggii*), Oregon oak (*Q. garryana*), canyon live oak (*Q. chrysolepis*), interior live oak (*Q. wislizenii*), red alder (*Alnus rubra [A. oregona]*), or white alder (*A. rhombifolia*), 57 inches circumference (18 inches DBH) or greater; or redwood (*Sequoia sempervirens*), bay (*Umbellularia californica*), Douglas fir (*Pseudotsuga menziesii*), or big-leaf maple (*Acer macrophyllum*), 75 inches circumference (24 inches DBH) or greater.

A Tree Permit is generally required for the removal, alteration or relocation of any "heritage tree," "protected tree" (i.e., any tree, including a heritage tree, designated to be preserved on an approved development plan or as a condition of approval of a tentative map, a tentative parcel map, or other development approval issued by the City), or "street tree" (i.e., any tree having a single trunk circumference greater than 6.25 inches or a diameter greater than 2 inches, a height of more than 6.5 feet or more of its trunk is within a public right-of-way or within 5 feet of the paved portion of a City street or a public sidewalk), except as exempted in Section 17-24.030 of the Tree Ordinance.

The project site contains 16 ornamental redwood trees concentrated within the southwestern corner, some of which potentially exceed 24 inches DBH. As described in the Project Description, no trees would be removed as part of the proposed project. Therefore, impacts would be less than significant.

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

Less than significant impact with mitigation incorporated. The proposed project is located within the boundaries of the Strategy. The Strategy covers CTS and four endangered plant species: Burke's goldfields, Sonoma sunshine, Sebastopol meadowfoam, and many-flowered navarretia. The purpose of the Strategy is to:

- Establish a long-term conservation program sufficient to mitigate potential adverse effects of future development on the Santa Rosa Plain, and to conserve and contribute to the recovery of the listed species and the conservation of their sensitive habitat;
- To accomplish the preceding [goal] in a fashion that protects stakeholders' (both public and private) land use interests, and

- To support issuance of an authorization for incidental take of California tiger salamander and listed plants that may occur over the course of carrying gout a broad range of activities on the Santa Rosa Plain.[57]

MM BIO-1a follows the requirements of the PBO for projects within dispersal distance of a potential CTS breeding site. Therefore, with implementation of MM BIO-1a, the proposed project would not conflict with the provisions of the Strategy.

Mitigation Measures

MM BIO-1a California Tiger Salamander

Following the requirements of the PBO for projects within dispersal distance of a potential CTS breeding site, the applicant shall obtain mitigation credits from an USFWS/CDFW-approved mitigation bank. Per the PCI CTS Site Assessment, the closest potential breeding site is located approximately 0.75 mile (3,960 feet) from the project site. Per the PBO, a ratio of 1:1 is required for projects that are greater than 2,200 feet and within 6,864 feet of a known breeding site; however, a lower ratio may be permitted by the USFWS and CDFW following a review of the current location of known viable breeding sites.

MM BIO-1b Protection of Active Bird Nests

To prevent impacts to Migratory Bird Treaty Act (MBTA) and/or Fish and Game Code protected birds, nesting raptors, and their nests, a pre-construction surveys shall be conducted no more than 7 days prior to start of construction activities. If an active nest is located during pre-construction surveys, construction activities shall be restricted as necessary to avoid disturbance of the nest until its young have fledged or the agencies deem disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment around an active raptor nest and an appropriate radius around an active migratory bird nest depending on the species as determined by a qualified Biologist) or alteration of the construction schedule. A qualified Biologist shall delineate the buffer using Environmentally Sensitive Area fencing, pin flags, and or yellow caution tape. The buffer zone shall be maintained around the active nest site(s) until the young have fledged and are foraging independently.

MM BIO-2 Seasonal Wetland

The project applicant shall coordinate with the Regional Water Quality Control Board (RWQCB) to determine jurisdiction before any earthmoving or grading activities within or adjacent to potential jurisdictional wetland. If the RWQCB determines that the areas on the project site are jurisdictional, then all work proposed in these areas shall be authorized by permits from the RWQCB.

[57] United States Fish and Wildlife Service (USFWS). 2005. Santa Rosa Plain Conservation Strategy. Website: https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/santa-rosa-strategy.php. Accessed December 8, 2020.

To offset the permanent impacts to the seasonal wetland that will be impacted due to project construction, compensatory mitigation is listed below, but is subject to change by specific permit requirements. Mitigation may be provided through the following options:

- The purchase and/or dedication of land to provide suitable wetland restoration or creation to offset the loss of 0.14 acre of seasonal wetland at a 1:1 ratio.
- Land purchase or dedication can be achieved by purchasing credits equal to the mitigation ratios above, at an approved mitigation, or preservation bank.
- Mitigation or preservation banks that are USFWS approved typically have approved management plans in place to conserve and monitor sensitive plant populations, wetlands, and suitable habitat. However, if mitigation credits are purchased at a bank, the existing management and monitoring plan shall need to be approved for the proposed project mitigation by USFWS prior to the purchase of the credits.

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

Environmental Evaluation

Setting

This section describes the existing cultural resources setting and potential effects from project implementation on the project site and its surrounding area. Descriptions and analysis in this section are based on information provided by the California Native American Heritage Commission (NAHC), Northwest Information Center (NWIC), National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historic Landmarks list, California Points of Historical Interest list, California Built Environment Resource Directory (BERD) for Sonoma County, the City of Santa Rosa Historic and Heritage resource listings. Non-confidential records search results, pedestrian survey photos, and correspondence with the NAHC and Tribal representatives are included in Appendix C.

Northwest Information Center

A records search and literature review were conducted on December 17, 2020, at the NWIC for the project site and a 0.5-mile radius surrounding it. The purpose of this review was to access existing cultural resource survey reports, archaeological site records, historic aerial photographs, and historic maps and evaluate whether any previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or other resources exist within or near the project site.

The results of the records search indicate that there are 17 recorded cultural resources (two prehistoric sites and 15 historic sites) within the 0.5-mile search radius, however, no resources were recorded within the project boundaries. In addition, 52 area-specific survey reports are on file with the NWIC for the project site and its 0.5-mile search radius. Reports S-24318, S-37283, and S-48798 address portions of the project site, indicating that it has previously been surveyed for cultural resources. A records search map identifying the project boundaries and a 0.5-mile search radius along with relevant non-confidential records search results can be found in Appendix C.

Pedestrian Survey

On January 14, 2021, FCS Senior Archaeologist, Dana DePietro, conducted a pedestrian survey for unrecorded cultural resources within the project site. The survey began in the southeast corner of the project site and moved north, using east-west transects spaced at 15-meter intervals whenever possible. Visibility of native soils was poor due to the majority of the site being covered with grasses, ranging from 2 -5 percent. Native soils were only visible in areas of bioturbation scattered across the site, and were composed of medium brown (7.5YR 4/4) alluvial soil with medium clay content, interspersed with small (1 to 2-centimeter) stones primarily composed of quartz and schist.

Survey conditions were documented using digital photographs and field notes. During the survey, Dr. DePietro examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, tool-making debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics).

All areas of the project site were inspected for culturally modified soils or other indicators of potential historic or prehistoric resources. No historic or prehistoric artifacts, cultural resources, or raw materials commonly used in the manufacture of tools (e.g., obsidian, Franciscan chert, etc.) were found within the project area.

Native American Heritage Commission

On November 19, 2020, FCS sent a request to the NAHC to determine whether any sacred sites are listed on its Sacred Lands File for the project area. A response was received on December 2, 2020, indicating that the Sacred Lands File search was negative for Native American Tribal Cultural Resources (TCRs) within the area. The NAHC also provided a list of eight additional tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by the proposed project are addressed, a letter containing project information requesting any additional information was sent to all eight tribal representatives on December 7, 2020. A response was received from the Lytton Rancheria of the Pomo Tribe on December 8, 2020, stating that there may be potential for finding TCRs on the site. The Tribe will consult whether further consultation on the project with the appropriate lead agency, the City of Santa Rosa, is necessary. No additional responses have been received to date. NAHC correspondence and copies of NAHC letters can be found in Appendix C.

Cultural Resources

Would the project:

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

No Impact. The results of the NWIC records search indicate that 15 historical resources have been recorded within a 0.5-mile radius of the project site, however no historical resources are located within the project boundaries. Historical resources refer to built environment resources, and the

results of pedestrian survey indicate that no unrecorded historical resources are present within the project site. Therefore, the proposed project would not have an adverse effect on historical resources. There would be no impacts associated with historical resources.

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

Less than significant impact with mitigation incorporated. Records search results from the NWIC indicate that two prehistoric resources have been recorded within a 0.5-mile radius of the project site but there are no prehistoric resources within the project site. Archaeological resources refer to subsurface prehistoric and historic resources. An intensive pedestrian survey of the project site conducted by FCS on January 14, 2021, failed to identify any indications of archaeological resources within the project site. All areas of the project site were inspected for culturally modified soils or other indicators of potential historic or prehistoric resources. No historic or prehistoric artifacts, cultural resources, or raw materials commonly used in the manufacture of tools (e.g., obsidian, Franciscan chert, etc.) were found within the project site. However, due to poor soil visibility, a creek within close proximity of the project site, and previously recorded prehistoric resources within 0.5 mile of the project boundaries, the project site is therefore considered to have moderate to low sensitivity for undiscovered archaeological resources.

While the records search and survey data indicate the likelihood of encountering archaeological resources during project construction is low, there is always a possibility that subsurface excavation may encounter previously undiscovered prehistoric archaeological resources. Such resources could consist of but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Accordingly, this is a potentially significant impact. Implementation of MM CUL-1 would require an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology to be present to monitor initial phases of ground disturbance. In the event archaeological resources are uncovered MM CUL-1 would require ground disturbance activity to cease until an Archaeologist could assess the find. Therefore, impacts would be reduced to a less-than-significant level.

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

Less than significant impact with mitigation incorporated. There are no records of historic cemeteries, Native American burial sites or other evidence that human remains may exist within the project site. However, in consultation with eight additional tribal representatives, the Lytton Rancheria of the Pomo Tribe stated that there may be potential for finding TCRs on the site and that all resources (flakes, isolates, etc.) be reported even if they may not reach a level of significance under CEQA.

There is also always the possibility that subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. Accordingly, this is a potentially significant impact. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 must be followed. In the unlikely event human remains are discovered, implementation of MM CUL-2 would reduce this potential impact to a less then significant level.

Mitigation Measures

MM CUL-1 An Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology shall inspect the site for exposed cultural resources following initial clearing and grubbing of the site, and prior to any grading or trenching. Based on the results of the inspection, the Archaeologist will make recommendations to the Lead Agency for any further monitoring that may be required. In the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers shall avoid altering the materials until an Archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology has evaluated the find. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The qualified Archaeologist shall make recommendations to the Lead Agency on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Potentially significant cultural resources include, but are not limited to, stone, bone, glass, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project site shall be recorded on appropriate Department of Parks and Recreation (DPR) 523 forms and will be submitted to the City of Santa Rosa, the Northwest Information Center, and the California Office of Historic Preservation (OHP), as required.

MM CUL-2 In the event of an accidental discovery or recognition of any human remains, Public Resources Code Section 5097.98 must be followed. In this instance, once project-related earthmoving begins and if 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 of the site or any nearby area reasonably suspected to overlie adjacent human 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 Native American Heritage Commission (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 to the landowner or the person responsible for the excavation work, 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, or
2. Where the following conditions occur, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project area in a location not subject to further subsurface disturbance:

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

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

Environmental Evaluation

Setting

Energy sources include electricity, natural gas, and other fuels. Energy is generally transmitted either in the form of electricity, measured in kilowatts or megawatts, or natural gas measured in therms or cubic feet. [58,59,60] Fuel, such as gasoline or diesel, is measured in gallons. Energy usage is also typically quantified using the British Thermal Unit (BTU). The BTU is the amount of energy that is required to raise the temperature of one pound of water by 1 degree Fahrenheit. As points of reference, the approximate amount of energy contained in a gallon of gasoline, 100 cubic feet (1 therm) of natural gas, and a kilowatt-hour (kWh) of electricity are 123,000 BTUs, 100,000 BTUs, and 3,400 BTUs, respectively.

The City of Santa Rosa's Ordinance Code Title 18 and Climate Action Plan (CAP) contain several measures to reduce the City's energy consumption. The proposed project would receive electricity and natural gas service from PG&E. Supporting information for this section is included as part of Appendix D.

Would the project:

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

Less than significant impact. A discussion of the project's energy use is presented below. Energy use consumed by the proposed project was estimated and includes natural gas, electricity, and fuel consumption for the proposed project. Energy calculations are included as part of Appendix D of this Draft IS/MND.

[58] 1 kW = 1.000 watts; a watt is a derived unit of power that measure rate of energy conversion. 1 watt is equivalent to work being done at a rate of 1 joule of energy per second. In electrical terms, 1 watt is the power dissipated by a current of 1 ampere flowing across a resistance of 1 volt.
[59] 1 MW = 1 million watts
[60] A therm is a unit for quantity of heat that equals 100,000 BTU. A BTU is the quantity of heat required to raise the temperature of 1 pound of liquid water 1 degree Fahrenheit at a constant pressure of 1 atmosphere.

Construction

During construction, the proposed project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings, lighting, and other sources. No natural gas would be utilized as part of construction. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site demolition, site preparation, grading, paving, and building construction. The types of equipment could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, frontend loaders, forklifts, and cranes. Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools.

Based on CalEEMod estimates for the proposed project, (see modeling output files in Appendix A), construction-related vehicle trips would consume an estimated 10,974 gallons of diesel and gasoline combined during the construction phase (Appendix D). As part of the project, the construction contractor would:

- Substitute electrified equipment for diesel- and gasoline-powered equipment where practical;
- Use alternative fuels for construction equipment on-site, where feasible, such as compressed natural gas, liquefied natural gas, propane, or biodiesel; and
- Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.

Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations Title 13, Sections 2449(d)(3) and 2485 limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. In addition, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. Single-wide mobile office trailers, which are commonly used in construction staging areas, generally range in size from 160 square feet to 720 square feet. A typical 720-square-foot office trailer would consume approximately 15,018 kWh during the 14-month construction phase (Appendix D). The City of Santa Rosa has established standard conditions of project approval that limit hours of construction to between the hours of 7:00 a.m. and 7:00 p.m. on weekdays, and between 8:00 a.m. and 6:00 p.m. on Saturdays; no construction is permitted on Sundays and holidays. As on-site construction activities would be restricted to these hours, it is anticipated that the use of construction lighting would also be similarly limited. Because of the temporary nature of construction and the financial incentives for developers and contractors to implement efficient energy use, the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, the construction-related impact related to fuel and electricity consumption would be less than significant.

Operation

Electricity and Natural Gas

Building operations for the proposed project would involve energy consumption for multiple purposes including, but not limited to, building heating and cooling, refrigeration, lighting (indoor and outdoor), and appliances. Based on CalEEMod estimates for the proposed project, long-term operations would consume approximately 357,634 kWh of electricity per year and an estimated 901,601 kilo-British Thermal Unit (kBTU) of natural gas per year (Appendix D). Currently, no on-site uses consume energy because the project site is vacant. The proposed project would be designed and constructed in accordance with the City's CAP, City of Santa Rosa's CALGreen Requirements, and CALGreen 2020 Tier 1 Standards, which are based on the State's Title 24 energy efficiency standards.

CALGreen Requirements include building, electricity, and water conservation energy saving measures that are required to be completed as part of the building permitting process.[61] Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the Title 24 Lighting Power Density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Compliance with Title 24 standards would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. Energy- and water efficient design measures for the proposed project would include the incorporation of solar power design, water efficient landscaping, and high-efficiency lighting and appliances. These standards are widely regarded as the most advanced energy efficiency standards and compliance with Title 24 standards would ensure that operational energy consumption would not result in the use of energy in a wasteful or inefficient manner. Therefore, the operational impact related to building electricity and natural gas consumption would be less than significant.

Fuel

Long-term operational energy consumption would also occur from fuel combustion associated with daily vehicle trips. Fuel consumption would be primarily related to vehicle use by residents and visitors. Based on CalEEMod estimates, vehicle trips associated with the proposed project would result in 1.98 million VMT and consume an estimated 92,594 gallons of gasoline and diesel combined on an annual basis.[62]

Sidewalks are located along Dutton Avenue and would serve the project site and connect the proposed project to other land uses. The proposed project would be within 4 miles of two regional routes of travel, Highway 101 and Highway 12, which would reduce employee's travel distance to major freeways. For these reasons, transportation fuel consumption would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during long-term operations. Therefore, the operational impact related to vehicle fuel consumption would be less than significant.

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[61] City of Santa Rosa. 2017. City of Santa Rosa Residential 2016 CALGreen+Tier 1 Checklist. February. Website: https://srcity.org/DocumentCenter/View/15211/2016-CALGreen-Checklist-New-Residential. Accessed December 5, 2019.

[62] Based on the 1,979,038 annual VMT consistent with CalEEMod output (Appendix A) and an average fuel consumption determined using Emission Factors Model (EMFAC) 2014 factors for Sonoma County in the 2023 calendar. Website: https://www.arb.ca.gov/emfac/2014/. Accessed December 6, 2019.

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

Less than significant impact. A discussion of the project's potential to conflict with or obstruct a State or local plan for renewable energy or energy efficiency is presented below.

Construction

As described above, construction activities would involve energy consumption in various forms and would be limited by California regulations such as California Code of Regulations Title 13, Sections 2449(d)(3) and 2485 which limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. The proposed project would be required to comply with these regulations. There are no renewable energy standards applicable to construction activities for the proposed project. In addition, all of the following measures, would be applied during construction of project and have been included as part of the proposed project as project design features:

- Substitute electrified equipment for diesel- and gasoline-powered equipment where practical.
- Use alternative fuels for construction equipment on-site, where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel.
- Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.

Thus, it is anticipated that construction of the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, impacts would be less than significant.

Operation

Additionally, California's Renewables Portfolio Standard (RPS) requires that 33 percent of electricity retail sales be served be renewable energy sources by 2020. PG&E would provide the delivery of electricity to the project through the existing grid, while Sonoma Clean Power would provide the electric generation service. Sonoma Clean Power's power mix as of 2018 includes 42 percent large hydroelectric, 49 percent renewable, and 9 percent general system power. Sonoma Clean Power's renewable energy resource mix is comprised of 46 percent large hydro, 25 percent wind, 8 percent solar, 18 percent geothermal, 3 percent California ISO system power, and 0.6 percent biomass and biowaste, as well as an EverGreen option for 100 percent local renewable service.[63] Senate Bill (SB) 32 mandates a Statewide GHG emissions reduction goal to 40 percent below 1990 levels by the year 2030. Sonoma Clean Power's current power mix already exceeds State requirements for 2020. Therefore, the proposed project would receive electricity from a utility company that meets California's RPS requirements as well as the State requirements for 2020.

In addition, the proposed CEDC building and veterinary clinic and animal hospital would be designed and constructed in accordance with the State's Title 24 energy efficiency standards. Part 11, Chapter 4 and 5 of the State's Title 24 energy efficiency standards establishes mandatory measures for nonresidential buildings, including bicycle parking, energy efficiency, water efficiency and conservation,

[63] Sonoma Clean Power. 2019. About Us. Website: https://sonomacleanpower.org/power-sources. Accessed February 25, 2021.

and material conservation and resource efficiency. The proposed project would be required to comply with these mandatory measures and would be constructed in accordance with City standards. Furthermore, the proposed project would include project design features that would increase the use of renewable energy. Specifically, the proposed project would include rooftop solar and would use alternatively-fueled or electrified construction equipment in place of diesel- or gasoline-powered equipment. Thus, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, operational energy efficiency and renewable energy standards consistency impacts would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.7 Geology and Soils *Would the project:*				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Evaluation

Setting

Descriptions and analysis in this section are based on the General Plan and General Plan Environmental Impact Report (EIR) as well as a Geotechnical Study Report prepared by RGH

Consultants on August 21, 2020, and a Paleontological Records Search prepared by Kenneth L. Finger, PhD, on November 21, 2020 (provided in Appendix E).

The City of Santa Rosa lies within the Coast Ranges, which are composed of marine sedimentary deposits and volcanic rocks. The Coast Ranges, located between the Pacific Ocean and the Sacramento and San Joaquin Valleys, go as far north as the Oregon border with California, and south to the Santa Ynez Mountains near Santa Barbara.[64] Santa Rosa is within the northern part of the Coast Ranges that are comprised of greywacke, shale, greenstone, basalt, chert, gravel, silt, clays, mudstones, and sandstone rock types.[65]

The City of Santa Rosa is in the San Francisco Bay Area, a seismically active region. The Rodgers Creek Fault Zone covers parts of northern Santa Rosa and the City is also approximately 8 miles southeast of the Maacama Fault Zone and 20 miles northeast of the San Andreas Fault Zone.[66] The Maacama Fault Zone is a system capable of producing a maximum magnitude 7.1 earthquake.

As part of the Geotechnical Study Report, RGH Consultants reviewed previous geotechnical studies in the vicinity and selected geologic references pertinent to the site and conducted geotechnical reconnaissance by drilling soil borings to determine soil composition and properties. On July 13 and July 28, 2020, RGH consultants performed a geotechnical reconnaissance of the site and explored the subsurface conditions by drilling six borings to depths ranging from about 10.5 to 30.5 feet below ground surface level (BGS). The soil samples obtained from the borings used to verify soil classifications and evaluate soil characteristics, and develop recommendations for design and construction. The test results are presented on the boring logs.[67]

The project site does not contain landforms that indicate the presence of active faults and the site is not located within a known Alquist-Priolo Earthquake Fault Zone.[68] Based on the Geotechnical Study Report and published landslide maps, the project site is relatively level and does not contain large-scale slope instability at the site. The project site is slightly elevated and uneven as though undocumented fill has been placed in the past. There is also a low area mapped as a seasonal wetland. The project site ground surface slopes steeply down about 3 to 5 feet toward Colgan Creek along the property line. In general, the ground surface is loose and soft. This is a condition generally associated with weak, porous surface soil. Natural drainage consists of sheet flow over the ground surface that concentrates in man-made surface drainage elements such as gutters, and the Colgan Creek.

Soil borings and laboratory tests indicate that the project site is covered by 0.5 to 1.5 feet of weak, porous, compressible, clayey soil. Porous soil appears hard and strong when dry but becomes weak and compressible as its moisture content increases towards saturation. In addition, the laboratory testing indicates on-site soils contain high plasticity and high expansion potential. These surface soils are underlain by sandy clay and clayey sand. Mapping by the Natural Resources Conservation Service indicates that the corrosion potential of the near surface soil is high for uncoated steel and low to

[64] City of Santa Rosa. 2009. Santa Rosa General Plan 2035. Draft Environmental Impact Report.
[65] Ibid.
[66] City of Santa Rosa. 2009. Santa Rosa General Plan 2035. Draft Environmental Impact Report.
[67] RGH Consultants. 2020. Geotechnical Study Report.
[68] Ibid.

moderate for concrete.[69] RGH encountered groundwater in soil borings at depths ranging from 13 to 17.5 feet BGS at the time of drilling and is known to fluctuate based on rainfall intensity and duration.

Liquefaction is a rapid loss of shear strength experienced in saturated, predominantly granular soil below the groundwater level during strong earthquake ground shaking due to an increase in pore water pressure. The occurrence of this phenomenon is dependent on many complex factors including the intensity and duration of ground shaking, particle size distribution and density of the soil. There are three potential consequences of liquefaction: bearing capacity failure, lateral spreading toward a free face (e.g., riverbank) and settlement. The Geotechnical Study Report determined that liquefaction could occur on the project site.[70]

As described in the Paleontological Records Search, the surface of the entire project site and its surrounding 0.5-mile search area consist solely of Holocene alluvial fan and fluvial terrace geologic deposits (Qhf). Older deposits mapped in the hills 1 mile to the east are unlikely to be present in the shallow subsurface of the project site. A paleontological records search of the University of California Museum of Paleontology (UCMP) database revealed no vertebrate or plant localities within the search area. The nearest locality (V3650) is 1 mile east of the project site, where a neural spine of the ground sloth (*Glossotherium* cf. *G. robustus*) was recovered from late Pleistocene deposits.[71]

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No impact. As described previously, the project site is not located within a known Alquist-Priolo Earthquake Fault Zoning Map and does not contain landforms indicative of an active fault. The closest Alquist-Priolo Fault Zone is the Rodgers Creek Fault located approximately 2.1 miles west of the project site. This distance precludes the possible exposure to fault rupture. Thus, no impact would occur.

ii) Strong seismic ground shaking?

Less than significant impact with mitigation incorporated. The project site could experience severe seismic ground shaking similar to other parts of the Bay Area. Strong seismic ground shaking from the Maacama and Rodgers Creek Faults could result in structural failure and collapse of structures, or cause non-structural building elements to collapse, presenting a hazard to building occupants, a potentially significant impact.

[69] RGH Consultants. 2020. Geotechnical Study Report.
[70] Ibid.
[71] Kenneth L. Finger, PhD. 2020. Paleontological Records Search.

The proposed project would be subject to the most recent California Building Standards Code (CBC) requirements for reducing seismic hazards. In addition, implementation of MM GEO-1 would ensure the project design and construction plans follow recommendations contained in a project site-specific design-level Geotechnical Study Report prepared for the project by a licensed Professional Engineer. Recommendations would include details related to proper excavation and grading methods, engineered fill material, slab-on-grade requirements, or other seismic design parameters consistent with the most recent CBC. Therefore, impacts would be less than significant with mitigation incorporated.

iii) Seismic-related ground failure, including liquefaction?

Less than significant with mitigation incorporated. As described previously, liquefaction could occur on the project site due to existing soil composition. One of the consequences of liquefaction is bearing capacity failure, which is the sudden and extreme settlement of foundations that typically occurs when the liquefied soil layer is relatively close (typically within two times the footing width, depending on the loads) to the bottom of the foundation.[72] The potential for bearing capacity failure is low on the project site because the liquefiable soil layers are a minimum of 10.5 feet BGS, which is far greater than any potential footing width and not near the surface.

Lateral spreading could occur where continuous layers of liquefiable soil extend to a free face, such as a creek bank. However, the potentially liquefiable soil layers on the project site are discontinuous and occur deeper than the toe of the slope on the western edge of the property, and as a result would not result in significant impacts. In addition, the proposed project would comply with City of Santa Rosa Creek setback guidelines and maintain a 50-foot setback from the top of Colgan Creek, which is where slopes exist. Therefore, the potential for liquefaction induced lateral spreading is low.

Finally, liquefaction could cause soil settlement, which is when soils are compressed under stress from seismic shaking and building loads. This can cause foundations to crack, heave, and result in structure failure. The Geotechnical Study Report determined that differential settlement could occur on-site between 0.5 and 0.75 inches, which could result in a potentially significant impact.

Implementation of MM GEO-1 would require the applicant to submit a project site-specific design-level geotechnical report for review and approval prior to issuance of a grading or building permit and to include the resulting recommendations in the construction, grading, and development plans. MM GEO-1 would require the project applicant to replace weak soils with engineered fill, where appropriate. In addition, MM GEO-1 would require that a licensed Professional Engineer design all soil engineering recommendations and structural foundations. Implementation of MM GEO-1 would ensure design and construction plans account for and address any potentially significant impacts related to liquefaction. Therefore, impacts would be less than significant with mitigation incorporated.

[72] RGH Consultants. 2020. Geotechnical Study Report.

iv) Landslides?

No impact. The probability for landslides to affect the project site is extremely low. As described previously, the project site is relatively level and does not contain large-scale slope instability at the site. In addition, based on published landslide maps the project site has not previously been impacted by landslides. The proposed project would comply with City Ordinance Code 20-30.040 and would maintain a 50-foot setback from the top of bank of Colgan Creek. Thus, no impact would occur.

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

Less than significant impact. Project construction would include clearing, grading, excavation, and other earthmoving activities. These activities would expose surface soils to wind and precipitation, which could cause soil erosion and loss of topsoil. Projects that disturb one or more acres of soil are required to obtain the General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit), issued by the State Water Resources Control Board (State Water Board). The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must list Best Management Plans (BMPs) the proposed project would implement to control erosion and prevent the conveyance of sediments off-site. With the implementation of the conditions of the Construction General Permit, erosion impacts resulting from project construction would remain less than significant.

The proposed project would be developed with a stormwater system designed to accommodate runoff from impervious surfaces, thereby minimizing potential erosion risk. Santa Rosa City Code Chapter 19-64 Grading and Erosion Control contains erosion control requirements for new construction and development projects to minimize sediment in stormwater runoff and minimize erosive processes. Adherence with the applicable requirements of the Construction General Permit and the Santa Rosa City Code would ensure impacts would be less than significant.

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

Less than significant impact with mitigation incorporated. As discussed under Impact 2.7(a)(i),(ii),(iii), and (iv), the proposed project could experience structural failures and liquefaction due to seismic ground shaking from regional faults or improperly built structures. Implementation of MM GEO-1, which requires review and approval of a project-specific, design-level geotechnical report prior to issuance of grading or building permit, would ensure that all geotechnical recommendations are included in the project design and construction plans and that the proposed project complies with the most recent edition of the CBC. As such, implementation of MM GEO-1 would reduce impacts to less than significant levels.

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

Less than significant impact with mitigation incorporated. As described previously and in detail in the Geotechnical Study Report, project site soils are highly plastic and expansive and have the potential to expand, compress, and deform because of the poor permeability leading to building and roadway structural and foundational failures. These qualities could present potentially significant impacts related to soil expansion.

However, MM GEO-1 would ensure the project applicant submits a project site-specific design-level geotechnical report prepared by a licensed Professional Engineer for review and approval prior to issuance of a grading or building permit. The geotechnical report would evaluate the project site's soils and determine the required construction and development plans details needed to reduce impacts from expansive soil conditions. As a result, impacts would be less than significant with mitigation incorporated.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No impact. The project does not propose the use of septic tanks. The proposed project would connect to the City's wastewater system and would comply with applicable wastewater requirements outlined in Impact 2.18, Utilities, of this Draft IS/MND. As such, no impacts would occur.

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

Less than significant with mitigation incorporated. According to the Paleontological Records Search results, the Holocene deposits mapped over the project site are too young to have any paleontological potential or sensitivity. In addition, there is no older deposit in the immediate vicinity of the project site, which would suggest that its presence in the project site's subsurface at a shallow depth where it could be impacted by anticipated excavations. Although unlikely, excavation during construction could unearth paleontological resources, a potentially significant impact. Implementation of MM GEO-2 would ensure construction activities would be diverted at least 15 feet from the find until a professional Paleontologist has assessed it and, if deemed significant, salvaged it in a timely manner. The Paleontologist would then reconsider whether for paleontological monitoring of subsequent excavations is justified. Salvaged fossils would be deposited in an appropriate repository, such as the UCMP, where they would be properly curated and made available for future research. Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM GEO-1 Prior to issuance of grading or building permits, the project applicant shall submit a design-level geotechnical report that provides geotechnical recommendations for the project based on adequate subsurface exploration, laboratory testing, and engineering analysis. In addition, the project applicant shall submit plans to the City

of Santa Rosa for review and approval demonstrating project compliance with the latest adopted edition of the California Building Standards Code (CBC) seismic requirements and the recommendations of the design-level geotechnical report. A licensed Professional Engineer shall design all soil engineering recommendations and structural foundations. The final project plans shall incorporate the recommendations from the approved, design-level geotechnical report. A licensed Geotechnical Engineer or Certified Engineering Geologist shall supervise all on-site soil engineering activities.

MM GEO-2 Prior to issuance of grading or building permits, the project applicant and City shall include in construction contracts a provision that should any significant paleontological resources (e.g., bones, teeth) be unearthed by the construction crew, construction activity be diverted at least 15 feet from find until a professional Paleontologist has assessed it and, if deemed significant, salvaged it in a timely manner.

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

Environmental Evaluation

Setting

Gases that trap heat in the atmosphere are referred to as GHGs. The effect is analogous to the way a greenhouse retains heat. Common GHGs include water vapor, CO_2, methane (CH_4), nitrous oxide, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, ozone, and aerosols. Natural processes and human activities emit GHGs. The presence of GHGs in the atmosphere affects the Earth's temperature. Emissions from human activities, such as electricity production and vehicle use, have elevated concentrations of these gases in the atmosphere beyond the level of naturally occurring concentrations.

Individual GHG compounds have varying global warming potential and atmospheric lifetimes. The global warming potential is the potential of a gas or aerosol to trap heat in the atmosphere. To describe how much global warming a given type and amount of GHG may cause, the CO_2 equivalent (CO_2e) is used. The calculation of the CO_2e is a consistent methodology for comparing GHG emissions since it normalizes various GHG emissions to a consistent reference gas, CO_2. For example, CH_4's warming potential of 25 indicates that CH_4 has 25 times greater warming effect than CO_2 on a molecule-per-molecule basis. A CO_2 equivalent is the mass emissions of an individual GHG multiplied by its global warming potential. The GHGs defined by AB 32 include CO_2, CH_4, nitrous oxide, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. A seventh GHG, nitrogen trifluoride, was added to Health and Safety Code Section 38505(g)(7) as a GHG of concern.

Supporting information for this section is included as part of Appendix A.

Would the project:

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

Less than significant impact with mitigation incorporated. Both construction and operational activities have the potential to generate GHG emissions. The proposed project would generate GHG

emissions during temporary (short-term) construction activities such as demolition, site preparation and grading, running of construction equipment engines, movement of on-site heavy-duty construction vehicles, hauling of materials to and from the project site, asphalt paving, and construction worker motor vehicle trips.

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

The 2017 BAAQMD Thresholds contain the following for project-related GHGs:

> For land use development projects (including residential, commercial, industrial, and public land uses and facilities), (1) the threshold is compliance with a Qualified GHG Reduction Strategy; or (2) annual emissions less than 1,100 metric tons per year of carbon dioxide equivalent (CO_2e); or (3) 4.6 metric tons CO_2e/service population/year (residents + employees).

It should be noted that the BAAQMD's thresholds of significance were established based on meeting the 2020 GHG targets set forth in the Assembly Bill (AB) 32 Scoping Plan.

The BAAQMD has not yet updated their recommended GHG emissions thresholds to address target reductions past year 2020. However, consistent with current State directives (SB 32 and AB 398), the updated target requires an additional 40 percent reduction in GHG emissions by year 2030. Applied to the BAAQMD quantitative thresholds based on 2020 AB 32 GHG reduction goals, this would equate to 660 metric tons (MT) CO_2e annually by year 2030 or 2.6 MT CO_2e per year per service population by year 2030.

Qualified GHG Strategies remain an appropriate threshold if the project's full buildout year falls within the time horizon covered within a Qualified GHG Strategy and if the Qualified GHG Reduction Strategy demonstrates compliance with post-2020 GHG reduction goals. The City of Santa Rosa calculated GHG emissions reductions with implementation of the City's CAP not just for comparison to the 2020 targets, but also out to year 2035 to be consistent with the planning horizon of the General Plan. As summarized on page ES-7 of the City's CAP, implementation of the measures of the City's CAP are expected to decrease GHG emissions to 2.3 MT CO_2e per person per year by year 2035.[73] While this timeframe is 5 years after the assumed 2030 target threshold, the City's CAP notes that with a reduction to 2.9 MT CO_2e per person per year in 2020 with assumed steady reductions over time, it can be concluded that emissions would be below 2.6 MT CO_2e per person per year (or a 40 percent reduction below 2020 thresholds) by year 2030.[74]

[73] City of Santa Rosa Community Development. 2012. Climate Action Plan: City of Santa Rosa. Website: https://srcity.org/DocumentCenter/View/10762/Climate-Action-Plan-PDF?bidId=. Accessed: May 26, 2020. June 5.
[74] Ibid.

Project Construction

The proposed project would emit GHG emissions during construction from off-road equipment, worker vehicles, and material delivery and/or hauling. Detailed construction assumptions are provided in Appendix A. The BAAQMD does not presently provide a construction-related GHG generation threshold but recommends that construction-generated GHGs be quantified and disclosed. Total GHG emissions generated during all phases of construction were combined and are presented in Table 10.

Table 10: Construction Greenhouse Gas Emissions

Construction Year	MT CO_2e per year[1,2]
Project Construction–2021	194
Project Construction–2022	241
Total Construction Emissions	**435**

Notes:
MT CO_2e = metric tons of carbon dioxide equivalent
[1] Emissions are rounded to the nearest whole number.
[2] Emissions were estimated assuming diesel fuel to represent a reasonably worse-case scenario in the absence of project-specific information that would be needed to override the CalEEMod default assumptions. The proposed project would limit emissions by using electrified equipment or alternatively-fueled equipment as feasible.
Source: CalEEMod Output (Appendix A).

As shown in Table 10, construction of the proposed project is estimated to generate approximately 435 MT CO_2e over the entire project construction duration. As discussed above, neither the City of Santa Rosa nor the BAAQMD have an adopted thresholds of significance for construction-related GHG emissions. Construction would be temporary and would not result in a permanent increase in emissions. The Santa Rosa CAP New Development Checklist includes measures to ensure new development projects are compliant with the City's Climate Action Plan (CAP). Compliance with applicable regulations and consistency with the CAP would ensure the proposed project would not interfere with the implementation of AB 32 or SB 32. The proposed project's consistency with the CAP is described in detail below. Impacts related to a proposed project's consistency with a GHG emissions reduction plan, including the City's CAP, are primarily related to long-term operational activities. However, short-term construction activities would comply with and use equipment and fuel consistent with Statewide and local requirements. Because construction of the proposed project would not conflict with the City's CAP after incorporation of MM GHG-1, the construction impact related to the generation of GHG emissions would be less than significant after incorporation of mitigation.

Project Operation

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

- **Motor Vehicles:** These emissions refer to exhaust related GHG emissions from the cars and trucks that would travel to and from the project site. Vehicle trips associated with project operations would primarily include employee trips to and from the proposed CEDC building and veterinary clinic. Trip generation rates used in estimating mobile-source emissions were consistent with those presented in the traffic analysis prepared for the project by W-Trans.[75] The combined trip generation potential is estimated to result in an average of 220 trips per day.
- **Natural Gas:** These emissions refer to the GHG emissions that occur when natural gas is burned on the project site for heating water, space heating, dryers, stoves, or other uses.
- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the proposed project. PG&E is a utility providing electricity and natural gas service to Sonoma County. The proposed project would receive natural gas through PG&E. The proposed project would be served with electricity generated by Sonoma Clean Power and delivered by PG&E. GHG emissions from energy consumption were calculated using PG&E's electricity intensity factors for CO_2, N_2O, and CH_4. Additionally, the CEDC building would include a solar photovoltaic system on the roof that would generate on-site renewable energy.
- **Water Transport:** These emissions refer to those associated with the electricity required to transport and treat the water to be used on the project site.
- **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the project.

The City's CAP follows both the State CEQA Guidelines and BAAQMD's Guidelines by incorporating the standard elements of a Qualified GHG Reduction Strategy. Standard elements of a Qualified GHG Reduction Strategy include measures or a group of measures (including performance standards) that demonstrate with substantial evidence that if implemented on a project-by-project basis would collectively achieve specified emissions levels.

Establishing consistency with a Qualified GHG Reduction Strategy (per CEQA Guidelines § 15183.5) is an appropriate approach to determine significance for individual projects and is one of the three recommended BAAQMD thresholds previously discussed. This approach allows lead agencies to analyze and mitigate the significant effects of GHG emissions at a programmatic level to reduce GHG emissions, so that later individual development projects may tier from the prior analysis to determine significance. Appendix D of the City's CAP describes in detail how the City's CAP was developed to satisfy the requirements of the BAAQMD's guidelines on the standard elements of a Qualified GHG Reduction Strategy, with the intent to allow future development projects to determine that a project has a less than significant impact on GHG emissions as long as it is in compliance with the City's CAP. These standard elements of a Qualified GHG Reduction Strategy and the of incorporation of each element into the City's CAP, are provided in Table 11.

[75] W-Trans. 2021. Focused Traffic Study for the Canine Companions CEDC Expansion Project. March 9.

Table 11: City of Santa Rosa Climate Action Plan Consistency with Elements of a Qualified Greenhouse Gas Reduction Strategy

Standard Elements of a Qualified GHG Reduction Strategy	The City of Santa Rosa Climate Action Plan's Incorporation of Elements of a Qualified GHG Reduction Strategy
Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic range.	**Incorporated.** The CAP consists of a city-wide GHG emissions inventory, which separates activities that generate GHG emissions into sectors including vehicle transportation, building energy usage, water delivery systems and others. The CAP incudes existing and projected GHG emission for the defined geographic range of the City of Santa Rosa. "Business-as-usual GHG forecast" (status quo before State, regional, and local reduction efforts are taken into consideration) GHG emissions are included in the CAP for years 2007, 2015, 2020, and 2035.
Establish a level, based on substantial evidence below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.	**Incorporated.** The City, in coordination with the Climate Protection Campaign, Sonoma County, and the other nine municipalities in Sonoma County, established one of the most aggressive GHG reduction targets in the State and nation by committing to reduce GHG emissions 25 percent below 1990 levels by 2015. The CAP demonstrates that the City would meet this reduction goal by 2020 with implementation of measures in the CAP. Furthermore, this goal exceeds the requirements of the AB 32 2020 reduction targets. With implementation of the reduction measures a total of 558,090 MT CO_2e is expected to be reduced in the City of Santa Rosa by 2020. The CAP includes calculated GHG emission reductions with implementation of the CAP not just for comparison to the 2020 targets but also out to year 2035, to be consistent with the planning horizon of the General Plan. As summarized on page ES-7 of the CAP, implementation of the measures of the Santa Rosa CAP are expected to decrease GHG emissions to 2.3 MT CO_2e per person per year by year 2035.
Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.	**Incorporated.** As previously mentioned, the CAP demonstrates that the City would GHG emissions 25 percent below 1990 levels by year 2020. The CAP includes calculated GHG emission reductions with implementation of the CAP not just for comparison to the 2020 targets but also out to year 2035, to be consistent with the planning horizon of the General Plan. As summarized on page ES-7 of the CAP, implementation of the measures of the Santa Rosa CAP are expected to decrease GHG emissions to 2.3 MT CO_2e per person per year by year 2035. In addition, the CAP states that its reduction measures build on previous efforts (particularly the Climate Protection Campaign's Community CAP). In addition, the measures offer a diverse mix of regulatory and incentive-based programs for both new and existing development.

Standard Elements of a Qualified GHG Reduction Strategy	The City of Santa Rosa Climate Action Plan's Incorporation of Elements of a Qualified GHG Reduction Strategy
Specify measures or a group of measures, including performance standards that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.	**Incorporated.** As explained on page ES-9 of the CAP, the CAP includes an implementation chapter and implementation matrix with details specific to each measure. Details described in the matrix include the following for individual measures: the responsible department, the implementation timeframe, and co-benefits. The CAP intended for this implementation matrix to be used to monitor the City's progress toward implementing the goals and policies included in the CAP. At the project level, the CAP includes a New Development Checklist for individual development projects to fill out to demonstrate compliance with the CAP.
Monitor the plan's progress.	**Incorporated.** As previously explained, the CAP includes an implementation matrix that will be used to monitor the City's progress toward implementing the goals and policies included in the CAP. The plans for implementation and monitoring are further explained on page D-9 of the CAP. The CAP indicates that it plans for staff to coordinate City Green Team meetings, track implementation of GHG reduction strategies and progress toward GHG reduction targets, and prepare annual reports to the City Council on CAP implementation and progress. The City has actively implemented and continues to actively implement GHG reduction measures from the community-wide CAP (City's CAP) appliable to this project and the Municipal Operations Climate Action Plan (Municipal CAP), with goals and policies related to GHG emissions produced by municipal activities and developments, to reduce local GHG emissions to meet State, regional, and local reduction targets. These actions are documented on "Climate Action Planning in Santa Rosa."[76] In February 2019, the Santa Rosa City Council designated implementation of the City's CAP as a Tier One Council priority. A Climate Action Subcommittee was formed in 2019 to provide guidance and oversight of the implementation of the Municipal CAP and the City's CAP with a goal of reducing the local GHG emissions and ensuring long-term sustainability and resilience from climate change and its effects.
Adopt the GHG reduction strategy in a public process following environmental review.	**Incorporated.** The City's CAP was adopted on June 5, 2012 and was adopted as a GHG reduction strategy in a public process following environmental review.
Source of City's CAP: City of Santa Rosa. 2012. City of Santa Rosa Climate Action Plan. Website: https://srcity.org/DocumentCenter/View/10762. Accessed March 22, 2021. June 5.	

[76] City of Santa Rosa. no date. Climate Action Planning in Santa Rosa. Website: https://srcity.org/1634/Climate-Action-Planning. Accessed: May 26, 2020.

As detailed in Table 11, the City's CAP remains a Qualified GHG Reduction Strategy and demonstrates that it would meet the anticipated State 2030 GHG emissions reductions targets. If the proposed project can demonstrate consistency with the City's CAP, its impacts related to GHG emission by year 2030 would be considered less than significant and fully consistent with State GHG emissions reduction requirements, with *no need to quantify project-specific emission*. This is consistent with BAAQMD guidelines related to the analysis of projects and accounts for the anticipated updates to BAAQMD's 2030 GHG targets.

To ensure new development projects comply with the City's CAP, the City developed the New Development Checklist. The proposed project's compliance with the New Development Checklist is shown in Table 12. Measures denoted with an asterisk are required in all new development projects. As shown in the table, the proposed project would comply with all applicable requirements.

Table 12: Consistency with Santa Rosa's Climate Action Plan New Development Checklist

New Development Checklist Measures	Project Consistency
Required Measures	
1.1.1: Comply with CALGreen Tier 1 standards*	**Complies.** The City of Santa Rosa Ordinance Code Chapter 18-42 requires compliance with Tier 1 CALGreen standards.[1] The proposed project would implement required green building strategies to comply with Tier 1 CALGreen standards. The proposed project includes sustainability design features that support the Green Building Strategy.[2]
1.1.3: After 2020, all new development will utilize zero net electricity*	**Complies.** The proposed project would be required to comply with California's Building Energy Efficiency Standards.[2] The City of Santa Rosa Ordinance Code Chapter 18-42 requires compliance with Tier 1 CALGreen standards.[1] The proposed project would implement required green building strategies to comply with Tier 1 CALGreen standards. Since the CAP adoption, the California Energy Commission (CEC) has determined that it is not possible to achieve net zero on a wholesale basis and "net zero" has been removed from the CA Energy Codes. Appendix E of the Climate Action Plan states that, "To be in compliance with the CAP, all measures denoted with an asterisk are required in all new development projects unless otherwise specified. If a project cannot meet one or more of the mandatory requirements, substitutions may be made from other measures listed at the discretion of the Community Development Director." CAP Goal 1.1 requires projects to comply with Tier 1 CALGreen requirements, as amended, for new nonresidential and residential development. Tier 1 CALGreen does not include "net zero" GHG assumptions for development. In addition, current CA Green Building Code Standards apply to all projects and has been determined by the Director to be an acceptable

New Development Checklist Measures	Project Consistency
	substitution for CAP Goal 1–1.1.3. Therefore, strict compliance with CAP Goal 1–1.1.3 is not achievable and not required. The City of Santa Rosa Ordinance Code Chapter 18-42 requires compliance with Tier 1 CALGreen standards and the proposed project would be required to include Tier 1 CALGreen standards.
1.3.1: Install real-time energy monitors to track energy use*	**Complies.** The proposed project would be built to comply with all regulations.
1.4.2: Comply with the City's tree preservation ordinance*	**Complies.** The proposed project's landscaping plan contains multiple trees, particularly along the project boundaries. The proposed project would not remove any existing trees. In the event that tree removal is required, the proposed project would be required to comply with the City's tree preservation ordinance.[3]
1.4.3: Provide public and private trees in compliance with the Zoning Code*	**Complies.** The proposed project would be required to comply with the City's Zoning Code.
1.5: Install new sidewalks and paving with high solar reflectivity materials*	**Complies.** The proposed project would be required to construct paved areas in accordance with City standards.
4.1.2: Install bicycle parking consistent with regulations*	**Complies.** The proposed project would include 13 bicycle spaces at the veterinary clinic and three spaces at the CEDC building and would therefore meet bicycle parking requirements.[4]
4.3.5: Encourage new employers of 50+ to provide subsidized transit passes*	**Not applicable.** The proposed project would have 30 full-time employees during operations at full buildout. Since the proposed project would not have at least 50 employees, this measure would not apply.
5.2.1: Provide alternative fuels at new refueling stations*	**Not applicable.** The proposed project would not include refueling stations.
6.1.3: Increase diversion of construction waste*	**Complies.** The proposed project would be required to comply with existing regulations.
7.1.1: Reduce potable water use for outdoor landscaping*	**Complies.** The proposed project would include an automatic irrigation system that would irrigate all landscaped areas with a weather system override in order to adjust the amount of water that is delivered. This system would measure evapotranspiration and be designed to irrigate each hydrozone independently in order to minimize water waste conform to the City's WELO and other outdoor water efficiency requirements.
7.1.3: Use water meters which track real-time water use*	**Complies.** The proposed project would include an automatic irrigation system that would irrigate all landscaped areas with a weather system override in order to adjust the amount of water that is delivered. This system would measure evapotranspiration and be designed to irrigate each hydrozone independently in order to minimize water waste conform to the City's WELO and other outdoor water efficiency requirements.

New Development Checklist Measures	Project Consistency
7.3.2: Meet on-site meter separation requirements in locations with current or future recycled water capabilities*	**Not applicable.** The proposed project is not located in an area with meter separation requirements. If applicable, the proposed project would comply with this measure.
9.1.3: Install low water use landscapes*	**Complies.** The proposed project would conform to the City's WELO, which requires low water use landscape designs.[5] Specifically, the proposed project would include an automatic irrigation system that would irrigate all landscaped areas with a weather system override in order to adjust the amount of water that is delivered. This system would measure evapotranspiration and be designed to irrigate each hydrozone independently in order to minimize water waste. Proposed trees would be irrigated by separate dedicated irrigation. The proposed irrigation system would meet all aspects of the City of Santa Rosa Water Efficiency Landscape Ordinance (Chapter 14-30).
9.2.1: Minimize construction equipment idling time to 5 minutes or less*	**Complies.** The proposed project would ensure that construction equipment idling time is minimized to 5 minutes or less. As required by MM AIR-1, signage would be posted at the project site throughout the duration of the construction period with idling restrictions clearly stated.
9.2.2: Maintain construction equipment per manufacturer's specs*	**Complies.** The proposed project would maintain construction equipment per manufacturer's specs.
9.2.3: Limit GHG construction equipment emissions by using electrified equipment or alternative fuels*	**Complies.** Emissions from the use of construction equipment would be limited through the use of electrified equipment or alternative fuels. Specifically, the following measures, would be applied during construction of project and have been included as part of the proposed project as project design features: a) Substitute electrified equipment for diesel and gasoline powered equipment where practical. b) Use alternative fuels for construction equipment on-site, where feasible, such as compressed natural gas, liquefied natural gas, propane, or biodiesel. c) Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.
Voluntary Measures	
2.1.3: Pre-wire and pre-plumb for solar thermal or photovoltaics (PV) systems	**Complies.** The proposed project would include solar photovoltaic systems.
3.1.2: Support implementation of station plans and corridor plans	**Complies.** The project site is not located within the North Santa Rosa Station Area Specific Plan or the Downtown Station Area Plan (the project site is located approximately 2.55 miles south of the North Santa Rosa Station Area's northwestern boundary).[6] The proposed project would not impede the implementation of this nearby plan or any other station or corridor plan.

New Development Checklist Measures	Project Consistency
3.2.1: Provide on-site services such as ATMs or dry cleaning to site users	**Not proposed.** This is a voluntary measure that is not proposed at this time. Furthermore, the proposed project is a Light Industrial development that would not include a commercial or mixed-use component.
3.2.2: Improve non-vehicular network to promote walking, biking	**Complies.** The proposed project would add sidewalks, walkways, and planter strips to promote walking and connectivity to other land uses and the existing biking network.
3.2.3: Support mixed-use, higher-density development near services	**Not proposed.** This is a voluntary measure that is not proposed at this time. The proposed project complies with the applicable land use and zoning.
3.3.1: Provide affordable housing near transit	**Not applicable.** The project proposes a CEDC and veterinary clinic and would not include housing units.
3.5.1: Unbundle parking from property cost	**Not proposed** This is a voluntary measure that is not proposed at this time.
3.6.1: Install calming features to improve pedestrian/bike experience	**Not proposed.** This is a voluntary measure that is not proposed at this time.
4.1.1: Implement the Bicycle and Pedestrian Master Plan	**Not proposed.** This is a voluntary measure that is not proposed at this time.
4.1.3: Provide bicycle safety training to residents, employees, motorists	**Not proposed.** This is a voluntary measure that is not proposed at this time.
4.2.2: Provide safe spaces to wait for bus arrival	**Not applicable.** There is not a bus stop or public transit stop on the project site.
4.3.2: Work with large employers to provide rideshare programs	**Not applicable.** The proposed project would result in 30 full-time employees. As such, the proposed project would not be considered a large employer.
4.3.3: Consider expanding employee programs promoting transit use	
4.3.4: Provide awards for employee use of alternative commute options	
4.3.7: Provide space for additional park-and-ride lots	**Not proposed.** This is a voluntary measure that is not proposed at this time.
4.5.1: Include facilities for employees that promote telecommuting	**Not proposed.** This is a voluntary measure that is not proposed at this time.
5.1.2: Install electric vehicle charging equipment	**Not proposed.** This is a voluntary measure that is not proposed at this time.
8.1.3: Establish community gardens and urban farms	**Not proposed.** This is a voluntary measure that is not proposed at this time.
9.1.2: Provide outdoor electrical outlets for charging lawn equipment	**Not proposed.** This is a voluntary measure that is not proposed at this time.

New Development Checklist Measures	Project Consistency

Notes:
* Measures denoted with an asterisk are required in all new development projects.
Source of policy and project requirements:
[1] City of Santa Rosa. 2021. Santa Rosa City Ordinance Code Chapter 18-42. Website: https://srcity.org/3228/Local-Code-Amendments. Accessed February 25, 2021.
[2] California Energy Commission (CEC). 2019. Building Energy Efficiency Standards—Title 24. Website: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards. Accessed December 6, 2019.
[3] City of Santa Rosa. 2017. Santa Rosa City Code Chapter 17-24. Website: http://qcode.us/codes/santarosa/view.php?topic=17-17_24&showAll=1&frames=on. Accessed February 25, 2021.
[4] City of Santa Rosa. 2019. Santa Rosa Municipal Code, Chapter 20-36.090. Website: http://qcode.us/codes/santarosa/view.php?topic=20-3-20_36-20_36_090&highlightWords=bicycle+parking. Accessed February 25, 2021.
[5] City of Santa Rosa. 2019. Santa Rosa City Code, Chapter 14-30 Water Efficient Landscape. Website: https://qcode.us/codes/santarosa/. Accessed February 24, 2021.
[6] City of Santa Rosa. 2019. 4.10 North Santa Rosa Station Area Specific Plan. Website: https://srcity.org/DocumentCenter/View/3047/Design-Guidelines-410-North-Santa-Rosa-Station-Area-Specific-Plan-PDF. Accessed February 25, 2021.
City of Santa Rosa. 2012. City of Santa Rosa Climate Action Plan, Appendix B: CAP New Development Checklist. Website: https://srcity.org/DocumentCenter/View/10762. Accessed February 25, 2021

At the time of this writing, the project applicant had prepared and submitted the New Development Checklist to the City of Santa Rosa's Planning Department. According to the City of Santa Rosa's Planning Department, an updated New Development Checklist was developed;[77] and has been officially adopted by the City, this Draft IS/MND evaluates the proposed project with respect to the most recent version of the New Development Checklist provided in the City's June 5, 2012, CAP. MM GHG-1 would ensure the proposed project would incorporate measures appliable at the time building permits are issued. Therefore, with implementation of MM GHG-1, the proposed project would comply with a Qualified GHG Reduction Strategy and would not result in a significant generation of GHG emissions after incorporation of mitigation.

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

Less than significant impact. Significance for this impact is determined by project compliance with (1) the City's CAP and (2) the ARB adopted 2017 Climate Change Scoping Plan Update. Project compliance with the policies and requirements included in the City's CAP are presented in Table 13. As shown in the table, the proposed project would comply with all applicable requirements.

It is acknowledged that the City's CAP's planning horizon of 2020 has passed; however, as described under Impact 8(a), implementation of the measures included in the City's CAP are expected to decrease GHG emissions to 2.3 MT CO_2e per person on an annual basis by year 2035,[78] and it can be concluded that emissions would be below 2.6 MT CO_2e per person per year (or a 40 percent reduction below 2020 thresholds) by year 2030. The actions and measures from the City's CAP are still applicable to the proposed project and are evaluated below.

[77] Kristinae Toomians, City Planner, City of Santa Rosa. Personal communication (emails) with Spencer Pignotti, Air Quality Analyst, FirstCarbon Solutions. February 2021.
[78] City of Santa Rosa Community Development. 2012. Climate Action Plan: City of Santa Rosa. Website: https://srcity.org/DocumentCenter/View/10762/Climate-Action-Plan-PDF?bidId=. Accessed: May 26, 2020. June 5.

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Table 13: Consistency with the City of Santa Rosa Climate Action Plan

Measure	Action Item	Project Compliance
Energy Efficiency in Existing Buildings: Facilitate energy efficiency upgrades and retrofits in existing commercial, residential, and industrial buildings by connecting residents and businesses with technical and financial assistance.	Connect businesses and residents with voluntary programs that provide free or low-cost energy efficiency audits and financing assistance for energy efficient appliances.	**Complies.** The proposed project is a new development project, and therefore the voluntary programs that provide free or low-cost energy efficiency audits and financing assistance for energy efficient appliances in existing buildings would not be applicable. However, the proposed project would comply with the latest energy efficiency standards and incorporate applicable energy efficiency features designed to reduce project energy consumption.[1]
	Work with the Sonoma County Energy Independence Program to offer low-interest financing and technical assistance to property owners for energy efficiency retrofits.	**Not applicable.** The proposed project is a new development project and would not include retrofits.
Smart Meter Utilization: Encourage existing development and require new development to utilize PG&E's Smart Meter system to facilitate energy and cost savings.	Require new construction and major remodels to install real-time energy monitors that allow building users to track their current energy use.	**Complies.** The proposed project would be built to comply with all regulations.
Cool Roofs and Pavements: Require new sidewalks, crosswalks, and parking lots to be made of cool paving materials with a high solar reflectivity.	Adopt an ordinance that requires and specifies cool paving materials for new parking lots, sidewalks, roofs, and crosswalks and integrates Low Impact Development (LID) guidelines for new construction and Capital Improvement Projects.	**Complies.** The proposed project would be required to construct paved areas in accordance with General Plan Policy H-G-2.[2]
	Ensure the cool roof and paving ordinance includes cool roof specifications which allow for green or living roofs and address energy installations on historic structures consistent with the Secretary of Interior's Rehabilitation Standards. Allow darker-color roofs when they meet cool roof standards.	**Complies.** The proposed project would comply with Title 24, which requires new buildings to be made of cool paving materials and be "solar ready."[1] The proposed project would include solar panels on the CEDC building.

Measure	Action Item	Project Compliance
Tree Planting and Urban Forestry: Plant and maintain trees on private property, streets, and open space areas.	Require new development to supply an adequate number of street trees and private trees.	**Complies.** The landscape plan includes the planting of multiple trees, particularly along the project's proposed boundaries and within the project site. The proposed project would not result in tree removal.
Energy Efficient Appliances: Facilitate the efficient use of energy for appliances in residential, commercial, and industrial buildings.	Seek funding sources to develop a rebate program for residents and businesses to exchange inefficient appliances with Energy Star-certified models.	**Complies.** Implementation of the proposed project would not preclude the building owners from exchanging any inefficient appliances with Energy Star verified models. Moreover, all appliances would meet the latest Title 24 efficiency requirements.[1]
Appliance Electrification: Encourage residents and businesses to switch natural-gas-powered appliances to electric power, where appropriate.	Utilize the energy efficient appliance rebate program to facilitate the replacement of natural gas equipment with electric-powered equipment.	**Complies.** Implementation of the proposed project would not preclude the building owners from exchanging any inefficient appliances with Energy Star verified models. Moreover, all appliances would meet the latest Title 24 efficiency requirements.[1]
	Identify opportunities to implement additional programs that will switch appliances from natural gas to electricity.	**Not applicable.** The proposed project is a new development.
Water Conservation: Continue to require and incentivize water conservation.	Require new development to reduce potable water use in accordance with the Tier 1 standards of CALGreen.	**Complies.** The proposed project would implement required green building strategies to comply with Tier 1 CALGreen standards. The proposed project includes sustainability design features (such as installing low-flow toilets) that support the Green Building Strategy.[1]
	Continue and expand water conservation efforts including water efficient landscaping, rainwater harvesting, and high-efficiency appliance and fixture installations.	**Complies.** The proposed project would include an automatic irrigation system that would irrigate all landscaped areas with a weather system override in order to adjust the amount of water that is delivered. This system would measure evapotranspiration and be designed to irrigate each hydrozone independently in order to minimize water waste conform to the City's WELO and other outdoor water efficiency requirements.

Measure	Action Item	Project Compliance
	Replace water meters in Santa Rosa with meters that allow residents and businesses to track real-time water use through the City's online web application.	**Complies.** The proposed project would include water meters in accordance with City standards.
	Encourage existing development and require new development to utilize smart water meters to facilitate water and cost savings.	**Complies.** The proposed project would utilize smart meters.
Lawn and Garden Activity: Encourage the use of electrified and higher-efficiency lawn and garden equipment.	Support the BAAQMD's efforts to re-establish a voluntary exchange program for residential lawn mowers and backpack-style leaf blowers.	**Not applicable.** This measure applies to government agencies and not individual development projects.
	Encourage new buildings to provide electrical outlets on the exterior in an accessible location to charge electric-powered lawn and garden equipment.	**Complies.** The proposed project would provide electrical outlets in accessible areas to be used for landscaping equipment per the requirements of the City Code.
	Encourage the replacement of existing high-maintenance and high-water use landscapes with low water use vegetation to reduce the need for gas-powered lawn and garden equipment.	**Complies.** The proposed project would include an automatic irrigation system that would irrigate all landscaped areas with a weather system override in order to adjust the amount of water that is delivered. This system would measure evapotranspiration and be designed to irrigate each hydrozone independently in order to minimize water waste conform to the City's WELO and other outdoor water efficiency requirements.
Construction Emissions: Reduce emissions from heavy-duty construction equipment by limiting idling and utilizing cleaner fuels, equipment, and vehicles.	Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes or less (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Provide clear signage at all access points to remind employees of idling restrictions.	**Complies.** As required by MM AIR-1, signage would be posted at the project site throughout the duration of the construction period with idling restrictions clearly stated.
	Construction equipment shall be maintained in accordance with manufacturer's specifications.	**Complies.** All project-related construction equipment shall be maintained in accordance with manufacturer's specifications and pursuant to BAAQMD requirements for all projects. MM AIR-1 would ensure consistency with this action item.

Measure	Action Item	Project Compliance
	Work with project applicants to limit GHG emissions from construction equipment by selecting one of the following measures, at a minimum, as appropriate to the construction project: a. Substitute electrified equipment for diesel- and gasoline-powered equipment where practical. b. Use alternative fuels for construction equipment on-site, where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel. c. Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.	**Complies.** Emissions from the use of construction equipment would be limited through the use of electrified equipment or alternative fuels. Specifically, the following measures, would be applied during construction of project and have been included as part of the proposed project as project design features: a) Substitute electrified equipment for diesel- and gasoline-powered equipment where practical. b) Use alternative fuels for construction equipment on-site, where feasible, such as compressed natural gas, liquefied natural gas, propane, or biodiesel. c) Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.

Source of policy and project requirements:

[1] California Energy Commission (CEC). 2019. 2019 Building Energy Efficiency Standards. Website: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency. Accessed February 23, 2021.

[2] City of Santa Rosa. 2009. Santa Rosa General Plan 2035. November 3. Website: https://srcity.org/DocumentCenter/View/24327/Santa-Rosa-General-Plan-2035-PDF-July-2019. Accessed February 25, 2021.

[3] City of Santa Rosa. 2019. Santa Rosa City Code, Chapter 17-24 Trees. Website: https://qcode.us/codes/santarosa/view.php?topic=17-17_24-iii-17_24_030&frames=on. Accessed February 25, 2021

[4] City of Santa Rosa. 2019. Santa Rosa City Code, Chapter 14-30 Water Efficient Landscape. Website: https://qcode.us/codes/santarosa/. Accessed December 6, 2019.

Source of measures and action items: City of Santa Rosa. 2012. City of Santa Rosa Climate Action Plan. Website: https://srcity.org/DocumentCenter/View/10762. Accessed February 25, 2021.

Santa Rosa Climate Action Plan New Development Checklist

To ensure new development projects comply with the Santa Rosa CAP, the City of Santa Rosa developed the New Development Checklist as described in Impact 8(a). As shown in Table 12, the proposed project would comply with all applicable requirements. As discussed in Impact 8(a), MM GHG-1 is required to ensure the proposed project would incorporate measures from the New Development Checklist that is in place at the time building permits are issued.

SB 32 2017 Scoping Plan Update

The 2017 Climate Change Scoping Plan Update addressing the SB 32 targets was adopted on December 14, 2017.[79] Table 14 provides an analysis of the proposed project's consistency with the 2017 Scoping Plan Update measures. As shown in Table 14, these measures are more focused at the Statewide implementation level and are not as applicable to local, project-level developments. Nevertheless, this analysis provides a description of each measure and if the measures are applicable to the proposed project.

Table 14: Consistency with SB 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Project Consistency
SB 350: 50 Percent Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.	**Not applicable.** This measure would apply to utilities and not to individual development projects. The proposed project would purchase electricity from PG&E subject to the SB 350 Renewable Mandate.
SB 350: Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	**Not applicable.** This measure applies to existing buildings. The proposed project proposes to construct new buildings on the project site.
Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	**Not applicable.** This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, vehicles accessing the proposed building at the project site would be benefit from the standards.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The Strategy includes a goal of having 4.2 million Zero Emission Vehicles (ZEVs) on the road by 2030 and increasing numbers of ZEV trucks and buses.	**Not applicable.** This measure is not applicable to the proposed project; however, vehicles accessing the project site would benefit from the increased availability of cleaner technology and fuels.

[79] California Air Resources Board (ARB). 2017. The 2017 Climate Change Scoping Plan Update, the Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. January 17. Website: https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf. Accessed March 10, 2020.

2017 Scoping Plan Update Reduction Measure	Project Consistency
Sustainable Freight Action Plan. The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	**Not applicable.** This measure applies to owners and operators of trucks and freight operations. The proposed project is a light industrial development that would support canine development and veterinary uses and would not support truck and freight operations. It is expected that deliveries throughout the State would be made with an increasing number of ZEV delivery trucks, including deliveries that would be made to future residents.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The Strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	**Complies.** Consistent with BAAQMD Regulation 6, Rule 3, no wood-burning devices are proposed as part of the project. Natural gas hearths produce very little black carbon compared to wood-burning fireplace; therefore, the proposed project would not include major sources of black carbon.
SB 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita VMT.	**Not applicable.** The proposed project does not include the development of a Regional Transportation Plan.
Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	**Not applicable.** The proposed project is not a major source and is not targeted by the cap-and-trade system regulations. Therefore, this measure does not apply to the proposed project.
Natural and Working Lands Action Plan. The ARB is working in coordination with several other agencies at the federal, State, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor's Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California's natural and working land.	**Not applicable.** The proposed project that is in an urbanized area and would not be considered natural or working lands.
Source of ARB 2017 Scoping Plan Update Reduction Measures: California Air Resources Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. November. Website: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed February 25, 2021.	

Conclusion

Project consistency with the goals, policies, and actions set forth in the City's CAP ensures that the proposed project would not impede or interfere with the City's goals or the goal to achieve the AB 32 State-recommended reduction targets. The proposed project is consistent with the applicable local plans, policies, and regulations included in the City's CAP and would not conflict with the provisions of any other State or regional plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. Furthermore, as shown in Table 14, implementation of the proposed project would not conflict with the reduction measures proposed in SB 32. In addition, the

applicable measures included in the City's CAP, as shown in Table 13, are included as part of the proposed project design and would reduce project-related GHG emissions. To ensure compliance and consistency with the City's CAP, MM GHG-1 requires that the project applicant submit a completed New Development Checklist prior to the issuance of building permits. Thus, with implementation of MM GHG-1, the proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce the emissions of GHGs. Therefore, the GHG emissions reduction plan consistency impact would be less than significant with mitigation.

Mitigation Measures

MM GHG-1 Prior to issuance of building permits, the applicant shall prepare and submit a Climate Action Plan (CAP) New Development Checklist for the proposed project to the City of Santa Rosa, to demonstrate to the City's satisfaction that the proposed project would be constructed and operated to be consistent with measures required in the applicable CAP Development Checklist in effect at that time.

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

Environmental Evaluation

Setting

The analysis in this section is based on the site-specific Phase I Environmental Site Assessment (Phase I ESA) prepared by Environmental Assessment Specialists (EAS) on February 16, 2021 (Appendix F).

Hazards analyzed in this section include hazardous materials, hazards related to proximity to airport and airstrip operations, and wildfires. Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that could pose a substantial present or

future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous materials are grouped into the following four categories, based on their properties:

- Toxic—causes human health effects
- Ignitable—has the ability to burn
- Corrosive—causes severe burns or damage to materials
- Reactive—causes explosions or generates toxic gases

A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. The criteria that define a material as hazardous also define a waste as hazardous. If improperly handled, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. California Code of Regulations, Title 22, Sections 66261.20–24 contain technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

The City of Santa Rosa has prepared an Emergency Operations Plan that identifies the City's emergency planning, organization and response policies, and procedures.[80] The City has also prepared a Local Hazard Mitigation Plan (LHMP) to address various types of hazards. The LHMP identifies the capabilities, resources, information, strategies for risk reduction, and critical facilities, and provides a set of strategies to reduce vulnerability to disaster through education and outreach programs, the development of partnerships, and implementation of actions to reduce the severity of impacts from a disaster.[81]

The purpose of the Phase I ESA was to identify recognized environmental conditions associated with the project site. To achieve this objective, the Phase I ESA included visual observations of the project site and observations of the surrounding properties, a visual survey for suspect asbestos-containing materials/debris piles/lead-based paint, limited historical land use review, review of regulatory database listings, and reviews of readily available geologic and hydrogeologic data. As part of the Phase I ESA, EAS staff conducted a regulatory records review, reviewed historical aerial photographs, historical maps, building permits (upon availability), and contacted and interviewed property representatives and regulatory agencies, as necessary. Additionally, EAS staff conducted a site visit in February 2021 and consulted with the project site representative, Robert Schwinn.

Due to the quality of the 1942 and 1952 aerial photographs, it is unclear if the project site was occupied by agricultural land or vacant land that was periodically scrubbed of vegetation for fire hazard abatement purposes. By 1957, the project site, together with adjacent properties appeared to be used for agricultural purposes. Due to the quality of the 1968 and 1973 aerial photographs, it is unclear if the project site was occupied by agricultural uses or vacant land. By 1985 until at least

[80] City of Santa Rosa. 2017. City of Santa Rosa Emergency Operations Plan. Website: https://srcity.org/DocumentCenter/View/16434/Emergency-Operation-Plan. Accessed March 26, 2019.

[81] City of Santa Rosa. 2016. City of Santa Rosa Local Hazard Mitigation Plan. Website: https://srcity.org/DocumentCenter/View/3982/Local-Hazard-Mitigation-Plan-Draft-PDF?bidId=. Accessed March 26, 2019.

1995, the project site appeared vacant. By 2004 (per Google Earth, the next available aerial photograph), the project site and remainder of the CCI Headquarters appeared similar to present-day land uses.[82] According to Mr. Schwinn, in the 1990s the former CCI facilities/maintenance manager had an unknown quantity of fill dirt imported onto the project site from an unknown source.[83]

No visual evidence (e.g., pipes, vents, pumps, and stains) that would indicate the past or present use of petroleum hydrocarbon underground storage tanks or leaking aboveground storage tanks on or immediately upgradient of the project site was readily apparent during the February 2021 site visit. The project site was not listed in the underground or aboveground fuel storage tank databases within the government records/regulatory database report. In addition, the project site was not listed on California State Water Resources Control Board (State Water Board), GeoTracker regulated facilities database.[84]

A State Responsibility Area (SRA) is an area of the State in which the financial responsibility of preventing and suppressing fires has been determined by CAL FIRE pursuant to Public Resources Code Section 4125, to be primarily the responsibility of the State. The proposed project is not located in an SRA.[85]

A Local Responsibility Area (LRA) is an area designated by CAL FIRE pursuant to Government Code Section 51178 that is not within an SRA and is managed at the local level. The project site is not located in a designated "Very High Fire Hazard Severity Zone" in an LRA.[86]

Would the project:

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

Less than significant impact. The proposed canine development facility and veterinary clinic would not involve the regular use of storage, transport, or disposal of significant amounts of hazardous materials. However, project construction and operation would involve the minor routine transport and handling of minimal quantities of hazardous substances such as diesel fuels, lubricants, aerosols, solvents, asphalt, pesticides, and fertilizers. Handling and transportation of these materials could result in the exposure of workers or residents to hazardous materials. However, the proposed project would not create a significant hazard to the public or the environment because hazardous substances would not be used, stored, or transported in sufficient quantities to create a significant hazard to the public. Furthermore, project construction and operation would comply with applicable

[82] Environmental Assessment Specialists (EAS). 2021. Phase I Environmental Site Assessment.
[83] Ibid.
[84] Ibid.
[85] California Department of Forestry and Fire Protection (CAL FIRE). 2019. California State Responsibility Area (SRA). Website: https://www.arcgis.com/home/webmap/viewer.html?layers=5ac1dae3cb2544629a845d9a19e83991. Accessed March 4, 2021.
[86] California Department of Forestry and Fire Protection (CAL FIRE). 2008. Very High Fire Hazard Severity Zones in LIRA (as recommended by CAL FIRE), Santa Rosa. Website: https://osfm.fire.ca.gov/media/6005/santa_rosa.pdf. Accessed March 4, 2021.

federal, State, and local laws pertaining to the safe handling and transport of hazardous materials. Therefore, impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than significant impact with mitigation incorporated. As described in Impact 2.9(a), the proposed project would involve the minor use of hazardous materials typically required during construction, such as diesel fuel and other motor lubricants. Contractors would comply with applicable federal, State, and local laws pertaining to the safe handling and transport of hazardous materials, which would minimize potential spill occurrences. Spills that may occur during construction activities would likely be minimal and potential adverse effects would be localized. Plans and specifications typically require contractors to clean up any spills of hazardous materials immediately.

Based on the poor quality of historical aerials, it is unclear if the project site was vacant or was occupied by agricultural uses between 1957 and 1973. If agricultural uses were present, a wide variety of pesticides, including those containing persistent compounds such as lead and arsenic, may have been used during this period. Additionally, in the 1990s the former CCI facilities/maintenance manager had an unknown quantity of fill dirt imported onto the project site from an unknown source, which was reportedly spread throughout the project site. As a result, on-site soils may contain hazardous materials from undocumented fill and pesticides/herbicides that are above action levels.

As the project site undergoes extensive grading and/or soil removal during the proposed construction activities, construction workers could be exposed to hazardous materials, which is considered a potentially significant impact. Implementation of MM HAZ-1 would require that soil sampling and testing be performed throughout the project site prior to any ground disturbance/construction activities. Once the analysis has been completed, the results would verify whether contaminated soils above action levels are present. If the Soil Screening Investigation determines that levels of hazardous compounds above applicable established thresholds for safety are found on-site, a construction worker health and safety plan would be required to be prepared and implemented during project construction. The applicant would also contract with a State-certified abatement specialist to dispose of soils at an appropriate facility in accordance with all federal and State regulations and ensure that any soils determined to be contaminated are not re-used for fill or other uses. MM HAZ-1 would also require construction workers to notify the City if abnormal soils, stained soils, and/or hydrocarbon odors are discovered during ground disturbance activity for further assessment. Therefore, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions and impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than significant impact. The closest school to the project site is Meadow View Elementary School, approximately 0.31 mile to the northwest of the project site. As described in Impact 2.9(a),

the proposed project would not involve the minor use of hazardous materials typically required during construction, such as diesel fuel and other motor lubricants. As a result, the proposed project would not involve the handling of small amounts of hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Therefore, impacts would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No impact. The Phase I ESA prepared for the proposed project reviewed regulatory agency records and reviewed local, State, and federal regulatory agency lists, including the State Water Board GeoTracker and Department of Toxic Substances Control Envirostor websites, to determine the presence of on-site hazardous materials. The Phase I ESA determined the project site is not listed on a hazardous materials site compiled pursuant to Government Code Section 65962.5. As such, no impact would occur.

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

No impact. The project site does not fall within the sphere of influence of the Sonoma County Airport or any other airport. The closest airport is Charles M. Shultz Airport located approximately 7.3 miles to the northwest. Given the distance of the project site from local airports and applicable air traffic and safety regulations, the proposed project would result in no impact with respect to air safety hazards.

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

Less than significant impact. The LHMP designates emergency evacuation routes, including U.S. 101, Sonoma Highway, Stony Point Road, and Dutton Avenue. The project site is located adjacent to Dutton Avenue and 1.6 miles from Stony Point Road. The project does not propose permanent road closures or lane narrowing that would impact an emergency response plan or evacuation plan. Additionally, as described in Impact 2.17, Transportation, the proposed project would not inhibit the future extension of Dutton Avenue to connect to the northern portion of Dutton Avenue. As a result, the proposed project would not conflict with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant.

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

Less than significant impact. The proposed project is not located in an SRA.[87] An LRA is an area designated by CAL FIRE pursuant to Government Code Section 51178 that is not within an SRA and is managed at the local level. The project site is not located in a designated "Very High Fire Hazard

[87] California Department of Forestry and Fire Protection (CAL FIRE). 2019. California State Responsibility Area (SRA). Website: https://www.arcgis.com/home/webmap/viewer.html?layers=5ac1dae3cb2544629a845d9a19e83991. Accessed March 4, 2021.

Severity Zone" in an LRA.[88] The proposed project would be consistent with the most recent version of the California Fire Code and CBC and all roadways would allow for fire apparatus access. In addition, as discussed in Impact 2.20, Wildfire, the proposed project would not impair evacuation routes or require installation of new infrastructure to reduce fire hazards. Therefore, impacts would be less than significant.

Mitigation Measures

MM HAZ-1 Prior to issuance of grading permits, the applicant shall complete the following actions:

a. Demonstrate to the City of Santa Rosa Planning Department that a Soil Screening Investigation, consisting of soil sampling and testing, has been performed throughout the project site.
b. If the Soil Screening Investigation determines that levels of hazardous compounds above applicable established thresholds for safety are found on-site, a construction worker health and safety plan shall be prepared and shall be implemented during project construction.
c. The applicant shall contract with a State-certified abatement specialist to excavate contaminated soils, stockpile soils on-site, and dispose of soils at an appropriate facility in accordance with all federal and State regulations. In addition, all soils that are determined to be contaminated shall not be re-used for fill or other uses.

During grading and construction, the applicant shall complete the following actions:

a. Standard dust mitigation measures shall be implemented during all development and soil handling activities.
b. During any grading or excavation activities, construction personnel shall identify any unusual conditions suggesting buried debris or other potential adverse environmental conditions that may be discovered on the project site.
c. During any ground disturbance activities, if abnormal soils are discovered all construction activities shall cease immediately and the City shall be contacted for further soil sampling and testing.

[88] California Department of Forestry and Fire Protection (CAL FIRE). 2008. Very High Fire Hazard Severity Zones in LIRA (as recommended by CAL FIRE), Santa Rosa. Website: https://osfm.fire.ca.gov/media/6005/santa_rosa.pdf. Accessed March 4, 2021.

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

Environmental Evaluation

Setting

Surface Water Quality

Several regulations at various jurisdictional levels protect water resources and quality. At the federal level, the Clean Water Act (CWA) is the primary federal law that governs and authorizes water quality control. Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. The CWA establishes the National Pollutant Discharge Elimination System (NPDES)

permit program to regulate municipal and industrial discharge, including those from municipal storm sewer systems, which require Municipal Separate Storm Sewer System (MS4) permits.

At the State level, the Porter-Cologne Water Quality Control Act 1969 (Porter-Cologne Act) oversees California's water quality control. The Porter-Cologne Act is California's statutory authority for the protection of water quality. Under the Porter-Cologne Act, the State must adopt water quality policies, plans, and objectives that protect the State's waters for the use and enjoyment of the people. Regional authority for planning, permitting, and enforcement is delegated to the nine RWQCBs.[89]

At the regional level, the North Coast RWQCB serves Del Norte, Glenn, Humboldt, Lake, Marin, Mendocino, Modoc, Siskiyou, Sonoma, and Trinity Counties. The City of Santa Rosa's current NPDES stormwater permit (Order No. R1-2009-0050) regulates both stormwater and non-stormwater discharges from public and private projects into the Santa Rosa municipal storm drain system. The permit requires a minimum set of BMPs to be implemented at all construction sites, as well as permanent stormwater Low Impact Development (LID) BMPs.[90]

Stormwater Runoff

At the local level, the General Plan outlines strategies to reduce and manage stormwater runoff. The SWPPP includes a description of BMPs to prevent the discharge of silt and sediment from point and non-point sources into receiving waters. The SWPPP aims to minimize the discharge of pollutants during construction, which includes, but is not limited to activities such as: clearing, grading, demolition, excavation, construction of new structures, and reconstruction of existing facilities involving removal and replacement that results in soil disturbance. The City's Standard Urban Stormwater Mitigation Plan (SUSMP) requires projects to design and implement post-development measures to reduce the potential stormwater impacts to local drainages.[91]

Groundwater Supply/Recharge

The City is located within the Laguna de Santa Rosa Watershed, in the confluence of the Santa Rosa, Bennett, and Rincon Valleys. The City has three sources of water supply: entitlements from the Sonoma County Water Agency (Sonoma Water), six groundwater wells, and recycled water. Sonoma Water receives its water supply from the Russian River while groundwater wells extract from the Santa Rosa Plain Subbasin. The Santa Rosa Plain Subbasin is not adjudicated, nor has it been identified by the California Department of Water Resources (DWR) as overdrafted nor anticipated to become overdrafted.[92] Table 15 summarizes the amount of groundwater that was pumped from the Santa Rosa Valley Basin between the 2011 and 2015. The Santa Rosa Subregional Water Reuse System produces recycled water for the City's residents and business.[93]

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[89] California Wetlands Information System. 2002. Summary of the Porter-Cologne Water Quality Control Act. Website: http://resources.ca.gov/wetlands/permitting/Porter_summary.html. Accessed January 22, 2021.

[90] California Regional Water Quality Control Board (RWQCB), North Coast Region. 2009. Order No. R1-2009-0050, Waste Discharge Requirements for the City of Santa Rosa. Website: https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2009/091014_09_0050_PERMIT_MS4_SRSonCoSCWA.pdf. Accessed March 24,2021.

[91] City of Santa Rosa. 2009. Santa Rosa General Plan 2035 Draft EIR, page 4.H-6.

[92] California Department of Water Resources (DWR). Evaluation of Ground Water Resources in Sonoma County Volume 2: Santa Rosa Plain, DWR Bulletin 118-4, 1982.

[93] City of Santa Rosa. 2015 Urban Water Management Plan (UWMP), page 3. Website: https://srcity.org/DocumentCenter/View/13875/Urban-Water-2015-Management-Plan-Without-Appendices. Accessed March 23, 2021.

Table 15: Groundwater Volume Pumped Acre-Feet/Year (AFY)

Groundwater Type	Location or Basin Name	2011	2012	2013	2014	2015
Alluvial Basin	Santa Rosa Valley	1,255	792	1,129	1,135	1,198
Source: Santa Rosa 2015 Urban Water Management Plan (UWMP)						

Sonoma Water entitlement provides up to 29,041 AFY of water while the groundwater wells provide up to 2,300 AFY. Gross total water usage for 2015 was 5,389 million gallons. Ninety percent of the City's water supply is from Sonoma Water, while the remainder comes from groundwater and recycled water.[94] The General Plan determined that in the year 2035, 38,486 AFY of water would be available, and demand would be 37,226 AFY. The Water Supply Assessment prepared for the General Plan concluded that the City would have adequate water supply.[95]

Dam Inundation and Flooding

Dam inundation occurs when a flood control dam/water reservoir is damaged severely enough to compromise its ability to hold back water. These events pose a high risk to the community but have low occurrence. This damage can occur as a result of earthquakes or other seismic activity, erosion of the dam face or foundation, or rapidly rising floodwaters that weaken the dam or overwhelm its capacity to drain excess water. When a dam fails, sudden fast-moving floods migrate throughout the inundation zone. The speed and volume of these floodwaters can damage or destroy property, cause injury or loss of life, and displace large numbers of residents in the flood's path.[96] Other hazards include seiches, oscillations of water in an enclosed body of water caused by strong winds, and rapid changes in atmospheric pressure. The General Plan also identifies that landslide hazards, including mudflows, increase with steep slopes located close to the Rodgers Creek Fault Zone.[97] The project site is not located within a known dam inundation failure zone.[98] The project site is located within Zone X–Area of Minimal Flood Hazard by the Federal Emergency Management Agency (FEMA) flood mapping application.[99]

Would the project:

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

Less than significant impact. The proposed project has the potential to release water pollutants during both construction and operation that may violate water quality standards and degrade surface or groundwater quality. During construction activity, runoff carrying eroded soils and pollutants could enter storm drainage systems and enter the Russian River and other nearby

[94] City of Santa Rosa. 2015 Urban Water Management Plan (UWMP), page ES-1. Website: https://srcity.org/DocumentCenter/View/13875/Urban-Water-2015-Management-Plan-Without-Appendices. Accessed March 23, 2021.
[95] City of Santa Rosa. 2009. Santa Rosa General Plan 2035 Draft EIR, page 4-G-12.
[96] City of Stan Rosa. 2016. City of Santa Rosa Local Hazard Mitigation Plan, page 38.
[97] City of Santa Rosa. 2009. Santa Rosa General, Plan 2035. Page 12-3.
[98] Sonoma County. 2021. Website: https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Hazard-Mitigation/Dam-Failure-Inundation-Map/. Accessed April 5, 2021.
[99] Environmental Assessment Specialists (EAS). 2021. Phase I Environmental Site Assessment.

waterbodies, increasing sedimentation and degrading downstream water quality. These sediments could be carried downstream and discharge into the Pacific Ocean and could degrade surface water quality. The sediments could also seep into the associated groundwater table. This would represent a potentially significant construction impact related to surface and groundwater quality.

Under the NPDES General Construction Permit (Order No. R1-2009-0050), projects that disturb one or more acres of land are required to obtain a permit before the start of construction activity. Accordingly, the proposed project would be required to prepare and implement a SWPPP (as outlined within City Municipal Code Section 17-12.170) during construction in accordance with federal and State requirements. The SWPPP would identify structural and non-structural BMPs intended to prevent erosion during construction. Although construction activities have the potential to generate increased sedimentation, compliance with applicable policies and regulations would minimize the potential to degrade water quality in downstream water bodies to the maximum extent possible. As a result, construction-related project impacts related to surface and groundwater quality would be less than significant.

Under existing conditions, the site is entirely composed of pervious surfaces. The proposed project would develop a CEDC and veterinary clinic with associated paved surfaces. As a result, the proposed project would increase impervious surface area on the project site compared to existing conditions and the stormwater runoff generated from the proposed project could carry pollutant such as motor oil, sediment, and trash into downstream waterways, which could degrade surface or groundwater quality, a potentially significant impact.

The City requires developers to prepare and implement the requirements set forth in the Storm Water Low Impact Development Technical Design Manual (LID Manual), pursuant to NPDES Municipal Separate Storm Sewer (MS4) Permit requirements.[100] As part of the issuance of grading and building permits, City staff would ensure the project includes incorporation of the LID Manual requirements.

The proposed project would include an on-site storm drainage system consisting of gutters, catch basins and underground pipes that would treat the stormwater and remove pollutants before releasing it to storm drainpipes that would connect to the existing pipes within Dutton Avenue consistent with Municipal Code Section 17-12.170. In addition, the proposed project would include trees, lawn areas, and a linear bioretention area consisting of native landscaping adjacent to the project boundary that would allow for stormwater treatment and percolation into soils before being discharged into stormwater drainage systems (Exhibit 9). In addition, implementation of permanent stormwater quality features as required under the SUSMP, and implementation of post-construction BMPs as required under the NPDES permit would ensure that no stormwater discharge requirements are violated. Therefore, the proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality and impacts would be less than significant.

[100] City of Santa Rosa. 2016. Roseland Area/Sebastopol Road Specific Plan Draft EIR. May.

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

Less than significant impact. As previously mentioned, 90 percent of the City's water supply is from Sonoma Water entitlements, which takes water from the Russian River. Although the City maintains six municipal groundwater wells, groundwater use represents less than 1 percent of the overall City of Santa Rosa water supply. Additionally, the proposed project would connect to existing City water lines contained in Dutton Avenue, similar to the existing land uses nearby and would not include a new groundwater well. The proposed project does not include components that would significantly increase population (e.g., residential uses) such that groundwater use would drastically increase resulting in substantially decreased groundwater supplies. The project site is within the City's UGB and is designated for light industrial use by the General Plan; as such, its water demand is accounted for in the Urban Water Management Plan (UWMP) projections. The UWMP forecasts a surplus of water under 2040 conditions and, therefore, adequate water supply would be available, and the proposed project would not significantly decrease groundwater supplies.

The proposed project would increase impervious surfaces on the site compared to existing conditions, which could interfere with groundwater recharge. However, pursuant to the SUSMP, the proposed project would be required to include stormwater BMPs, such as bioretention swales, that limit the volume and flow rate of stormwater on-site by providing opportunities for groundwater infiltration, as shown in Exhibit 9. As such, the proposed project would not significantly interfere with groundwater recharge. Therefore, impacts would be less than significant.

c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

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

Less than significant impact. Colgan Creek is located adjacent to the project site's northern boundary. The on-site seasonal wetland is not connected to Colgan Creek and no streams or rivers are located on the project site. Although the proposed project would not alter the course of any streams or rivers, the proposed project would substantially alter the existing natural drainage pattern on-site. As part of construction, the entire project site would be graded, and a stormwater system would be installed. As described in Impact 2.10(a), the proposed project would be required to implement a SWPPP as part of its Construction General Permit. The SWPPP is designed to ensure that erosion and siltation are prevented or minimized to the maximum extent feasible during construction. Grading and construction may temporarily alter stormwater flow patterns; however, compliance with Final Stormwater LID, NPDES permit conditions, and the applicable provisions of the Municipal Code would lessen impacts related to erosion or siltation during construction.

At operation, the on-site stormwater system would be composed of catch basins and underground pipes that would convey stormwater to stormwater treatment facilities located on the project site. In addition, the proposed project would include bioretention area including native landscaping as shown in Exhibit 9 that would prevent sediments from entering Colgan Creek. The proposed project

would be required to submit a Stormwater LID Determination Worksheet and Stormwater LID to the City, which would determine the need for BMPs. These BMPs would be designed to prevent stormwater related erosion and siltation impacts on- or off-site. Therefore, impacts related to alteration of drainage patterns resulting in erosion or siltation would be less than significant.

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

Less than significant impact. As discussed in Impact 2.10(a), the existing site is completely composed of pervious surfaces. The proposed project would develop impervious surfaces on the project site resulting in an increase in impervious surface compared to existing conditions that could increase the rate or amount of surface runoff in a manner that could result in flooding. However, the proposed project would include a bioretention area with native landscaping to the west of the project roadway and parking area, which would be designed to detain and meter the release of peak runoff in order to avoid inundating downstream waterways in a manner that creates substantial flooding. In addition, the proposed project would be required to submit a Stormwater LID Determination Worksheet and Stormwater LID to the City, which would determine the need for BMPs. These BMPs would be designed to mimic the stormwater benefits of the natural environment by reducing peak stormwater runoff rates so that runoff can soak into the ground and not result in flooding. As result, the proposed project would not significantly increase the rate or amount of surface runoff that would result in flooding on- or off-site. Therefore, impacts would be less than significant.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less than significant impact. The proposed project would increase the amount of surface runoff generated on the project site because of an increase in impervious surfaces compared to existing conditions. Consistent with the Construction General Permit, the proposed project would implement a SWPPP during construction, as outlined in the Municipal Code Section 17-12.170, which would identify structural and non-structural BMPs intended to prevent significant polluted runoff during construction. Compliance with these guidelines would prevent the discharge of pollutants to stormwater during construction.

As discussed previously, the proposed project would include a storm drainage system consisting of a bioretention area with native landscaping, catch basins, and underground piping that would be designed to detain and meter the release of peak runoff in order to avoid inundating downstream waterways in a manner that creates substantial flooding. In addition, consistent with the Santa Rosa LID Manual, the proposed project would include BMPs that would prevent significant additional sources of polluted runoff. These BMPs would include swales and natural landscaping that slow runoff and prevent pollutants from entering the stormwater system and ultimately the Russian River. As a result, the proposed project would not create or contribute significant stormwater runoff or additional sources of polluted runoff. Therefore, impacts would be less than significant.

(iv) impede or redirect flood flows?

No impact. As shown in the Phase I ESA, the project site is located within Zone X–Area of Minimal Flood Hazard and would not be located in an area prone to flooding or within a designated flood hazard zone. As described in further detail under Impact 2.10(d), the project site is not susceptible to inundation from flood hazards, tsunamis, or seiches. As a result, the proposed project would not impede or redirect flood flows. Therefore, there would be no impact.

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

No impact. As discussed previously, the project site is located in Zone X—Area of Minimal Flood Hazard. In addition, the project site is not located in a flood prone area. Seiches and tsunamis are short duration earthquake-generated water waves in large, enclosed bodies of water and the open ocean. The project site is not near any large inland bodies of water and is approximately 20 miles east of the Pacific Ocean and over 7 miles southwest of Spring Lake, a condition that precludes inundation by tsunami or seiche. Therefore, no impacts would occur.

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

Less than significant impact. Given that proposed construction would disturb more than 1 acre of land, the proposed project would be required to comply with the terms of the City's Construction General Permit, which requires the preparation and implementation of a SWPPP that includes BMPs to ensure reduction of pollutants from construction activities potentially entering surface waters or groundwater basins and would not obstruct the implementation of a water quality control plan or sustainable groundwater management plan.

As discussed under Impact 2.10(b), the City maintains six municipal groundwater wells, but groundwater uses represent less than 1 percent of the overall City of Santa Rosa water supply. In addition, the project does not propose the use of groundwater as a significant source of water supply. Developments that create or replace a combined total of 1 acre or more of impervious surface are also subject to follow the City's SUSMP. The SUSMP requires implementation of LID BMPs that aim to decentralize stormwater treatment and to integrate it into the overall site design. The LID Technical Design Manual encourages the use of LID techniques to both retain and treat runoff water from impervious surfaces. As a result, during operation, the proposed project would not conflict with or obstruct a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

The project site consists of undeveloped land directly north of the existing driveway to the CCI Headquarters. As shown in Exhibit 2, the project site is bound by Colgan Creek and storage and light industrial uses (west), unimproved County-owned fields (north), commercial and light industrial uses and low-density residential homes (northeast), commercial and industrial uses (east), commercial and industrial uses (south), and low-density residential homes (southwest).

The project site is designated Light Industry by the Santa Rosa General Plan 2035 (Exhibit 4a). The Light Industry designation is intended for light industrial, warehousing, and heavy commercial uses. Uses appropriate to this land use category include auto repair, bulk or warehoused goods, general warehousing, and services with large space needs, such as health clubs. The proposed project is also zoned Light Industrial (IL), which is compatible with the Light Industrial classification in the General Plan (Exhibit 4b).

The project is located within the planning area of the Santa Rosa Roseland Area/Sebastopol Road Specific Plan (Specific Plan), which designates the project site as Light Industry, which allows for Light industrial, warehousing, and heavy commercial uses (Exhibit 4c).[101]

Would the project:

a) Physically divide an established community?

No impact. The physical division of an established community would occur if construction of a large linear feature such as a railroad or interstate highway separated an existing community or if a feature that connects a community is removed, such as a bridge. The proposed project does not involve any such features and would not remove any means of access in the surrounding area. No linear features would be constructed, and no connecting features would be removed. No impact would occur.

[101] City of Santa Rosa. 2016. Roseland Area/Sebastopol Road Specific Plan. November.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than significant impact. As described in the Environmental Setting, the project site is designated Light Industry by the Santa Rosa General Plan 2035 (Exhibit 4a) and zoned Light Industrial (IL) (Exhibit 4b). The Light Industry designation is intended for light industrial, warehousing, and heavy commercial uses. Uses appropriate to this land use category include auto repair, bulk or warehoused goods, general warehousing, and services with large space needs, such as health clubs. Although canine development centers and veterinary services are not directly included in the General Plan designation, the City of Santa Rosa Ordinance Code permits these types of uses under the IL designation with approval of a MUP. As a result, the project applicant would be required to submit a MUP, which would be reviewed by the City of Santa Rosa Planning Division. Conditional use permits, such as the MUP, allow for the approval of special uses if they are compatible with surrounding uses.[102]

As shown in Exhibits 4a, 4b, and 4c, light industrial uses are located adjacent to the project site's east and southern boundary with Low Density Residential uses to the west, across Colgan Creek, and north. In addition, the existing CCI Headquarters is located directly south of the project site. As a result, the proposed project would be surrounded by similar uses and would be setback from nearby residential uses to avoid any impacts. Furthermore, the MUP requires the project to undergo Design Review by the City of Santa Rosa Planning Division. The design review process ensures that new or remodeled developments in the City will enhance the City's environment, and that a development will blend into the style of the area around it.[103]

The project is located within the planning area of the Santa Rosa Roseland Area/Sebastopol Road Specific Plan (Specific Plan), which designates the project site as Light Industry, which allows for Light industrial, warehousing, and heavy commercial uses (Exhibit 4c).[104] Consistent with Goal ED-1 and Policy ED-1.5 of the Specific Plan, the project's uses as a CEDC and veterinary clinic and animal hospital would support a local business, CCI, and create new employment opportunities in the light industrial area of the Specific Plan. Furthermore, the Specific Plan anticipated 321,014 square feet of new industrial uses within the plan area; the proposed project would contribute 36,143 square feet of development, representing approximately 12 percent of the anticipated growth. As a result, the proposed project would be consistent with the buildout, goals, and policies contained in the Specific Plan, and would not conflict with the applicable land use designation or zoning policies adopted for the purpose of avoiding or mitigating and environmental effect. Impacts would be less than significant.

Mitigation Measures

None required.

[102] City of Santa Rosa. Conditional Use Permits. Website: https://www.srcity.org/478/Conditional-Use-Permits. Accessed February 26, 2021.
[103] City of Santa Rosa. 2021. Design Review Process. Website: https://srcity.org/388/Design-Review. Accessed March 3, 2021.
[104] City of Santa Rosa. 2016. Roseland Area/Sebastopol Road Specific Plan. November.

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

Environmental Evaluation

Setting

The California Surface Mining and Reclamation Act of 1975 (SMARA) is the primary State law concerning mineral resources, including sand, gravel, and building stone which are important for commercial purposes. Because of the economic importance of mineral resources, SMARA limits new development in areas with significant mineral deposits. SMARA also requires State Geologists to classify specified areas into Mineral Resource Zones. According to the Roseland Area/Sebastopol Road Specific Plan EIR, the planning area does not contain mineral resources or aggregate deposits and does not contain active mineral recovery sites.[105]

There are no mineral resource recovery sites on or in the vicinity of the project site. [106] The nearest active mine is the Canyon Rock Co., Inc., located approximately 10 miles to the northwest of the site.

Would the project:

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

No impact. The project site does not currently support any mineral recovery efforts, and no known significant mineral resources exist. The proposed project would not result in the loss of availability of a known mineral resource, and there would be no impact.

[105] Michael Baker International. May 2016. Roseland Area/Sebastopol Road Specific Plan EIR.
[106] Division of Mine Recreation, California Department of Conservation. 2016. Mines Online. Website: maps.conservation.ca.gov/mol/index.html. Accessed February 26, 2021.

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

No impact. There are no mineral resource recovery sites within or near the project site.[107] In addition, the project site is not designated or zoned as a mineral recovery site by the General Plan or zoning code. The proposed project would not impact any mineral resource recovery site, and no impact would occur.

Mitigation Measures

None required.

[107] City of Santa Rosa. 2009. Santa Rosa General Plan 2035. Environmental Impact Report. March. Website: https://srcity.org/DocumentCenter/View/24327/Santa-Rosa-General-Plan-2035-PDF-July-2019. Accessed March 10, 2020.

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

Environmental Evaluation

Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

A dB is a logarithmic unit, which expresses the ratio of the sound pressure level being measured to a standard reference level. The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. Audible increases in noise levels generally refer to a change of 3 dB or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. Only audible changes in existing ambient or background noise levels are considered potentially significant.

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

Regulatory Framework

The City has established Noise Compatibility Standards for residential and nonresidential land uses in the Noise and Safety Element of the Santa Rosa General Plan 2035.[108]

Santa Rosa General Plan

The City of Santa Rosa General Plan (General Plan) contains goals, objectives, and policies that address noise. The goals, objectives, and policies established in General Plan that are applicable to the proposed project are summarized below:

- Encourage residential developers to provide buffers other than sound walls, where practical. Allow sound walls only when projected noise levels at a site exceed land use compatibility standards.
- Projects should pursue measures to reduce noise impacts primarily through site planning. Engineering solutions for noise mitigation, such as sound walls, are the least desirable alternative.
- Adopt mitigations, including reduced speed limits, improved paving texture, and traffic controls, to reduce noise to normally acceptable levels in areas where noise standards may be exceeded (e.g., where homes front regional/arterial streets and in areas of mixed use development).
- Developers should incorporate acoustical site planning into their projects. Recommended measures include:
  - Incorporating buffers and/or landscaped earth berms;
  - Orienting windows and outdoor living areas away from unacceptable noise exposure;
  - Using reduced-noise pavement (rubberized-asphalt);
  - Incorporating traffic calming measures, alternative intersection designs, and lower speed limits; and
  - Incorporating state-of-the-art structural sound attenuation and setbacks.
- New projects are discouraged that have the potential to create ambient noise levels more than 5 dBA L_{dn} above existing background, within 250 feet of sensitive receptors.

Santa Rosa Municipal Code

The City also addresses noise in the ordinances of the City Code. Santa Rosa Municipal Code Section 17-16.120, Machinery and Equipment, states that "it is unlawful for any person to operate any machinery, equipment, pump, fan, air conditioning apparatus or similar mechanical device in any manner so as to create any noise, which would cause the noise level at the property line of any property to exceed the ambient base noise level by more than five decibels."

The City's standard conditions of project approval limit the hours of construction to 7:00 a.m. to 7:00 p.m., Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays. No construction is permitted on Sundays and holidays.

[108] City of Santa Rosa. 2009. Santa Rosa 2035 General Plan, Element 12: Noise and Safety.

Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Short Term Construction Impacts

Less than significant impact. For purposes of this analysis, a significant impact would occur if construction activities would result in a substantial temporary increase in ambient noise levels outside of the City's permissible hours for construction (7:00 a.m. to 7:00 p.m., Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays) that would result in annoyance or sleep disturbance of nearby sensitive receptors.

Construction-related Traffic Noise

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. One type of short-term noise impacts that could occur during project construction would result from the increase in traffic flow on local streets, associated with the transport of workers, equipment, and materials to and from the project site. The transport of workers and construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. Because workers and construction equipment would use existing routes, noise from passing trucks would be similar to existing vehicle-generated noise on these local roadways. Typically, a doubling of the Average Daily Traffic (ADT) hourly volumes on a roadway segment is required in order to result in an increase of 3 dBA in traffic noise levels; which, as discussed in the characteristics of noise discussion above, is the lowest change that can be perceptible to the human ear in outdoor environments. Project-related construction trips would not be expected to double the hourly traffic volumes along any roadway segment in the project vicinity. For this reason, short-term intermittent noise from construction trips would not be expected to result in a perceptible increase in hourly- or daily-average traffic noise levels in the project vicinity. Therefore, short-term construction-related noise impacts associated with the transportation of workers and equipment to the project site would be less than significant.

Construction Equipment Operational Noise

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 or 4 minutes at lower power settings. Impact equipment such as pile drivers are not expected to be used during construction of this project.

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

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

The closest noise-sensitive receptor to the project site is the single-family residence located northeast of the project site on Darlyn Way. The façade of this closest home would be located approximately 270 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would operate simultaneously. At this distance, construction noise levels could range up to approximately 75 dBA L_{max}, with a relative worst-case hourly average of 71 dBA $L_{eq(h)}$ at this receptor. These noise levels could occur temporarily under the reasonable worst-case scenario of multiple pieces of heavy construction equipment operating simultaneously in relatively the same locations at the nearest project boundary for an hour period. These noise levels would drop off at a rate of 6 dBA per doubling of distance as the equipment moves over the site and operates at greater distances from off-site receptors.

Although there could be a relatively high single event noise exposure potential causing an intermittent noise nuisance, the effect of construction activities on longer-term (hourly or daily) ambient noise levels would be small but could result in a temporary increase in ambient noise levels in the project vicinity that could result in annoyance or sleep disturbance of nearby sensitive receptors. Therefore, restricting the permissible hours of construction to daytime hours would reduce potential impacts that could result in annoyance or sleep disturbances at nearby sensitive receptors. Therefore, noise producing construction activities shall be restricted to comply with the City's standard conditions of project approval limiting the hours of construction to 7:00 a.m. to 7:00 p.m., Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays; and no construction is permitted on Sundays and holidays. Compliance with these stated time-periods as outlined in the City's standard conditions for project approval would ensure that construction noise would not result

in a substantial temporary increase in ambient noise levels that would result in annoyance or sleep disturbance of nearby sensitive receptors, and temporary construction noise impacts would be reduced to less than significant.

Operational/Stationary Source Noise Impacts

Less than significant impact. A significant impact would occur if operational noise levels generated by stationary noise sources at the proposed project site would result in a substantial permanent increase in ambient noise levels in excess of any of the noise performance thresholds established by the City. According to the City Code Section 17-16.120, it is also unlawful for any person to operate any machinery, equipment, pump, fan, air conditioning apparatus or similar mechanical device in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient base noise level by more than 5 dBA. Therefore, for purposes of this analysis, an increase of 5 dBA or greater would be considered a substantial permanent increase in ambient noise levels.

Mechanical Equipment Operations

At the time of preparation of this analysis, details were not available pertaining to proposed rooftop mechanical ventilation systems for the project. Therefore, a reference noise level for typical rooftop mechanical ventilation systems was used. Noise levels from typical commercial-grade mechanical ventilation equipment are anticipated to range up to approximately 60 dBA L_{eq} at a distance of 25 feet. Proposed mechanical ventilation systems would be located over 280 feet from the nearest off-site sensitive receptor, the single-family residence located northeast of the project site on Darlyn Way. At this distance, noise generated by proposed mechanical ventilation equipment would attenuate to below 40 dBA L_{eq} at the nearest off-site residential receptor. These noise levels are lower than typical suburban nighttime noise levels and would not be expected to result in any increase in existing hourly- or daily-average ambient noise levels as measured at the nearest off-site sensitive receptor.

Therefore, proposed mechanical ventilation equipment operational noise levels would not result in a substantial permanent increase in ambient noise levels in the project vicinity, and potential noise impacts to off-site sensitive receptors would be less than significant.

Parking Lot Activities

The proposed project would include new stationary noise sources, such as typical parking lot activities. Typical parking lot activities such as people conversing, doors slamming, or vehicles idling generate noise levels of approximately 60 dBA to 70 dBA L_{max} at 50 feet. These activities are expected to occur sporadically throughout the day, as visitors and staff arrive and leave the parking lot areas. Proposed parking areas would be located over 410 feet from the nearest off-site sensitive receptor, the single-family residence located northeast of the project site on Darlyn Way. At this distance, noise generated by project parking lot activity would attenuate to below 52 dBA L_{max} at the nearest off-site residential receptor. These noise levels would not result in an increase above existing ambient noise levels (there is an existing commercial parking lot located approximately 235 feet southeast of this nearest residential receptor). In addition, these single-event maximum noise level activities would only occur for a cumulative of a minute or two within any hour and would therefore

not result in a perceptible increase in the hourly average noise levels as measured at the nearest off-site sensitive receptor.

Therefore, project parking lot activities would not result in a substantial permanent increase in ambient noise levels in the project vicinity, and potential noise impacts to off-site sensitive receptors would be less than significant.

Operational/Mobile Source Noise Impacts

Less than significant impact. A significant impact would occur if project-generated traffic would result in a substantial increase in ambient noise levels compared with those that would exist without the project. According to the General Plan noise element policies, new projects are discouraged that have the potential to create ambient noise levels more than 5 dBA L_{dn} above existing background noise levels, within 250 feet of sensitive receptors. Therefore, for purposes of this analysis, an increase of 5 dBA or greater would be considered a substantial permanent increase in ambient noise levels.

The proposed project is expected to generate an average of 240 trips per day, including 34 AM peak-hour trips and 32 p.m. peak-hour trips.[109] These trips would access the project site via Dutton Avenue, north of Bellevue Avenue. There are no noise sensitive land uses along this roadway segment. In addition, based on the amount of existing office and industrial land uses along this roadway segment, this amount of average daily project trips would not double the hourly or daily total traffic volumes along this segment of Dutton Avenue. A characteristic of noise is that a doubling of sound sources with equal strength is required to result in a 3 dBA or greater increase in noise levels. Therefore, implementation of the proposed project would not result in even a 3 dBA increase in traffic noise levels along the access roadway, and potential project-related traffic noise increases would be well below the 5 dBA increase that would be considered significant. Therefore, project-related traffic noise impacts on off-site receptors would be less than significant.

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

Less than significant impact. A significant impact would occur if the project would generate groundborne vibration or groundborne noise levels in excess of established standards. For determining construction-related vibration impacts, the Federal Transit Administration (FTA) Construction Vibration Impact Criteria are utilized. The FTA has established industry accepted standards for vibration impact assessment in its Transit Noise and Vibration Impact Assessment Manual, dated September 2018. For example, the construction vibration impact criteria for a structure of non-engineered timber and/or masonry construction is 0.2 in/sec Peak Particle Velocity (PPV).

Groundborne noise is generated when vibrating building components radiate sound, or noise generated by groundborne vibration. In general, if groundborne vibration levels are do not exceed levels considered to be perceptible then groundborne noise levels would not be perceptible in most

[109] W-Trans, 2021. Focused Traffic Study for the Canine Companions CEDC Expansion Project. March 9.

interior environments. Therefore, this analysis focuses on determining exceedances of groundborne vibration levels.

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

Short-term Construction Vibration Impacts

A significant impact would occur if construction activities would result in vibration that produces a particle velocity greater than or equal to 0.2 in/sec PPV measured at the nearest structure.

Of the variety of equipment used during construction, a large vibratory roller that could be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. A large vibratory roller produces groundborne vibration levels ranging up to 0.210 in/sec PPV at 25 feet from the operating equipment.

The closest off-site structure is a shed structure located on the residential property approximately 150 northeast of the construction footprint where heavy construction equipment could operate. At this distance, groundborne vibration levels would range up to 0.034 in/sec PPV from operation of the types of equipment that would produce the highest vibration levels. This vibration level is well below the vibration threshold of 0.2 in/sec PPV as measured at the nearest structure. Therefore, the impact of short-term groundborne vibration associated with construction to off-site receptors would be less than significant.

Operational Vibration Impacts

The City has not adopted criteria for operational groundborne vibration impacts. Therefore, for purposes of this analysis, a significant impact would occur if project ongoing activities would produce groundborne vibrations that are perceptible without instruments by a reasonable person at the property lines of a site.

The project does not include any permanent noise or vibration sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the project vicinity. Therefore, implementation of the proposed project would not generate groundborne vibration or groundborne noise levels in excess of established standards and potential impacts on off-site receptors would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No impact. The project site is not located within the vicinity of a private airstrip. The nearest public airport to the project site is the Sonoma County Airport, 7.8 miles northwest of the project site.

Sonoma County General Plan EIR Figure AT-9 indicates that the project site is outside of the 65 dBA CNEL airport noise contour. As such, the project site would be exposed to aviation noise levels of less than 65 dBA CNEL. The nearest private airstrip is the Santa Rosa Air Center airstrip, located approximately 1.8 miles west of the project site. At this distance, and due to the orientation of the runways, the project site is outside of the 55 dBA CNEL noise contours of this private airstrip. Therefore, implementation of the proposed project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development, and no impact would occur.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

According to the California Department of Finance, the City had a population of 167,815 as of January 1, 2010, and a population of 173,628 as of January 1, 2020,[110] totaling a 5.5 percent increase in population from 2010 to 2020.[111] Additionally, in 2019 Sonoma County had a labor force of 257,100 persons with approximately 250,000 employees resulting in an unemployment rate of 2.1 percent.[112] The General Plan projects that the City would increase by 89,405 people by 2035 and would add 25,225 new housing units for a total of 96,295 units.[113] The City projected regional housing needs in its General Plan Housing Element. The City's share of the 2015-2023 Regional Housing Needs Assessment (RHNA) is 5,083 housing units.[114]

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than significant impact. Unplanned direct population growth would occur if the proposed project produced a population growth not anticipated and evaluated by the City of Santa Rosa in its General Plan. The proposed project would develop a 21,991-square-foot CEDC building, 8,972 square feet of exterior impervious surface areas for dog runs and play areas, and a 5,180-square-foot

[110] California Department of Finance. 2018. Report E-5, Population and Housing Estimates for Cities, Counties, and the State.
[111] Calculation: [(177,017–167,815)/167,815]*100 = 5.5.
[112] State of California. Employment Development Department. Unemployment Rate and Labor Force Data for California Areas Detailed. Sonoma County 2019. Website: https://www.labormarketinfo.edd.ca.gov/data/unemployment-and-labor-force.html. Accessed: April 5, 2021.
[113] City of Santa Rosa. 2009. Santa Rosa General Plan 2035, Land Use and Livability Element, page 2-15
[114] Association of Bay Area Governments (ABAG). Regional Housing Need Plan San Francisco Bay Area 2015-2023. December 2013.

veterinary clinic and animal hospital. The proposed project would not result in direct population growth because it would not include housing units.

Unplanned indirect population growth would occur if the proposed project created employment opportunities and/or removes barriers to growth not accounted for in the General Plan or considered as part of the project. For example, a project could create thousands of jobs and result in a substantial number of people moving to the area permanently to pursue employment. In addition, barriers to growth include lack of roads, water and wastewater services, and public services such as fire and police protection, schools, and hospitals.

The proposed project would generate temporary employment opportunities during construction. These employees would be temporary and limited to the project construction period. As of 2009, the most readily available data, approximately 7 percent of the City's labor force consisted of construction jobs, employing 5,493 people.[115] Given the relatively short construction period, the local labor pool would be expected to satisfy labor demands of the project. As a result, construction workers would not require permanent relocation contributing to population growth over time and for the period of construction the proposed project would not contribute substantially to new employment. The proposed project would employ 30 full-time employees. However, these employees would be a part of existing CCI operations and would occupy the project when complete. Even if the project required 30 new employees at operation, that is not a significant amount and would be expected to be satisfied from the existing labor pool. As a result, the proposed project would not generate a significant amount of employment opportunities during operation.

The area around the project site currently contains utility infrastructure such as roads, water, wastewater, and stormwater facilities to which the project could connect. Dutton Avenue is an existing street and would provide direct access to the project site. Extension of infrastructure to the project site would serve the site alone and would not remove barriers of growth.

Overall, the proposed project would not result in direct population growth nor induce significant indirect population growth. Therefore, impacts would be less than significant.

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

No impact. The project site is vacant and does not contain existing housing or people. Therefore, this condition precludes the potential for impacts and no impact would occur.

Mitigation Measures

None required.

[115] Association of Bay Area Governments (ABAG). City of Santa Rosa General Plan Housing Element, Table 4-6. 2009

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

Environmental Evaluation

Setting

Public services provided by the City include fire protection, police protection, education, recreation and parks, and libraries.

Santa Rosa Fire Department

Santa Rosa Fire Department (SRFD) provides fire protection services in the City o. The SRFD responds to all fires, hazardous materials incidents, and medical emergencies (including injury accidents) in the City. The senior command structure consists of a Fire Chief, an Emergency Preparedness Coordinator, a Deputy Fire Chief, an Administrative Services Officer, and a Division Chief Fire Marshal. The SRFD consists of three Bureaus—Operations, Administration, and Prevention—and two divisions—Training and Safety Division and Support Services Division. Ten fire engines and two truck companies respond to emergencies.[116] The SRFD has 138 dedicated employees. The General Plan establishes a response time goal for first resource arrival within 5 minutes of dispatch 90 percent of the time. A secondary goal, pertaining to larger incidents, is to provide a full assignment within 8 minutes 90 percent of the time. The closest station to the project site is Fire Station 8, located 2.7 miles north of the project site at 830 Burbank Avenue.

Santa Rosa Police Department

Santa Rosa Police Department (SRPD) provides police protection services throughout the City.[117] The SRPD consists of four divisions (Administration, Field Services, Special Services, and Technical Services) consisting of seven Bureaus: Patrol, Investigations, Communications, Records, Technology, Traffic, and Support Services. There is one police station located at 965 Sonoma Avenue. The SRPD keeps track of officer time spent with a goal of half time spent answering calls for service and half

[116] City of Santa Rosa. Fire Department About Us. Website: https://srcity.org/395/About-Us Accessed March 5, 2021.
[117] City of Santa Rosa. Police Department About Us. Website: https://srcity.org/243/About-Us.

time engaging with the community. Currently, the SRPD is not meeting this target, as more time is spent responded to calls than engaging with the community. Police officers respond from assigned patrol areas at an average response time of 6 minutes and 26 seconds.[118]

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

a) Fire protection?

Less than significant impact. Fire Station No. 8 is located at 830 Burbank Avenue, approximately 2.8 miles from the project site. The Specific Plan anticipated 321,014 square feet of new industrial uses within the plan area, with the project contributing 36,143 square feet, which represents approximately 12 percent of anticipated growth. The project's impacts related to fire protection were therefore already evaluated in the Specific Plan EIR, which determined that potential impacts would be less than significant.

Compliance with existing codes and requirements would help ensure that performance objectives for fire protection are met and that there is adequate funding for any capital improvements necessary to maintain adequate fire protection services in the region. As discussed in Impact 2.17, Transportation, the proposed project would be accessible by fire trucks and emergency vehicles. Furthermore, as part of the design review process, the City would provide the project site plans to the Fire Department to confirm compliance and the need for any refinements to enhance emergency access in support of public health and safety. As such, new or expanded fire facilities would not be required to serve the proposed project. Therefore, impacts would be less than significant.

b) Police protection?

Less than significant impact. Police officers respond from assigned patrol areas at an average response time of 6 minutes and 26 seconds. As stated in Section 2.14, Population and Housing, the proposed project would have a negligible impact on population increase. Additionally, the proposed project would provide fencing around the entire project site for added safety. Physical design features such as building and security lighting, perimeter landscaping, and landscape setbacks to separate the property from public areas have also been incorporated into the proposed project design. As a result, the proposed project would not require additional police services and would not result in the need for new or expanded facilities. As such, the SRPD would adequately serve the proposed project and would not result in the need for new or physically altered facilities. Therefore, impacts would be less than significant.

[118] City of Santa Rosa Police Department. 2019. 2018 Annual Report. Website: https://srcity.org/3230/SRPD-Annual-Reports. Accessed: March 23, 2021.

c) Schools?

No impact. As stated in Section 2.14, Population and Housing, the proposed project does not include any housing, and would not therefore result in any increase in students. As a result, the proposed project would not require additional school services or expanded facilities. Therefore, no impacts would occur.

d) Parks?

No impact. As stated in Section 2.14, Population and Housing, the proposed project does not include any housing, and would not therefore result in any increase in the use of parks., As a result, the proposed project would not require additional parks services or expanded facilities. Therefore, no impacts would occur.

e) Other public facilities?

No impact. As stated in Section 2.14, Population and Housing, the proposed project does not include any housing, and would not therefore result in any increase in the use of other public facilities. Therefore, the proposed project would not create an increased demand for other public services, such as library services. Therefore, impacts would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.16 Recreation				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Environmental Evaluation

Setting

General Plan Policy PSF-A-2 and the City Code establish a City standard of 3.5 acres of city park land per 1,000 residents.[136] The General Plan 2035 EIR determined the City would have 864.15 acres of parks and recreational facilities with development of all undeveloped and proposed park facilities by 2035. Based on an expected population of 233,520 by 2035 at full buildout of the General Plan, the City's 864.15 acres of parkland would result in a ratio of 3.7 acres of city parks per 1,000 residents, which would exceed the established standard of 3.5 acres per 1,000 residents.[137] Additionally, the City of Santa Rosa has Spring Lake County Park (320 acres) and Annadel State Park (5,000 acres) located within its UGB.

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?

Less than significant impact. The closest recreation area to the project site is Lower Colgan Creek Park, located approximately 0.6 mile southwest of the project site. Southwest Community Park is 1.8 miles northwest of the project site and features barbecues, a baseball/softball diamond, a basketball court, a large grass area, a playground, picnic tables, and a soccer field.

As described in Section 2.14, Population and Housing, the proposed project is not expected to generate significant direct or indirect population growth within the City, and would not therefore increase park usage or result in the substantial deterioration of facilities. Impacts would be less than significant.

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?

Less than significant impact. The proposed project is not expected to increase demand and use of existing recreational facilities. As described in Section 2.14, Population and Housing, the proposed project is not expected to generate significant direct or indirect population growth within the City. As a result, the proposed project would not substantially increase recreational facility use or require the expansion of recreation facilities. Therefore, impacts would be less than significant.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

The analysis in this section is based on the Focused Traffic Study prepared by W-Trans on March 9, 2021 (Appendix G). The project site is located in the southwest portion of the City. The project site is located adjacent to several parcels that have not been developed and therefore do not have urban amenities such as sidewalks and streetlights. Dutton Avenue, a four-lane arterial street, is planned to be extended northerly from its existing terminus just north of the project site, at which time it would provide a connection to Hearn Avenue. However, the planned extension of Dutton Avenue is not part of this project.

Trip Generation

The anticipated trip generation for the proposed project was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 10th Edition, 2017. The trip generation potential of the veterinary clinic was developed using the rates for an Animal Hospital/Veterinary Clinic (Land Use No. 640). Because the CEDC would be a less intense use, rates for a Light Industrial use (Land Use No. 110) were applied, as this category most closely matches the proposed project as well as the underlying zoning. Based on application of these assumptions, the proposed project is expected to generate an average of 220 trips per day, including 34 AM peak-hour trips and 32 PM peak-hour trips. These results are summarized in Table 16.

Table 16: Trip Generation

Land Use	Units (1,000 square feet)	Daily		AM Peak-hours				PM Peak-hours			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Veterinary Clinic	5.2	21.50	111	3.64	19	13	6	3.53	18	7	11
Light Industrial	22.0	4.96	109	0.70	15	14	1	0.63	14	2	12
Total		n/a	**220**	n/a	**34**	**27**	**7**	n/a	**32**	**9**	**23**

Source: W-Trans. 2021. Focused Traffic Study for the Canine Companions CEDC Expansion Project

Sight Distance

The recommended sight distance at intersections of public streets is based on corner sight distances, with approach travel speeds used as the basis for determining the recommended sight distance. Additionally, the stopping sight distance needed for a following driver to stop if there is a vehicle waiting to turn into a side street or driveway is evaluated based on stopping sight distance criterion and the approach speed on the major street.

Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities such as lighting and benches. Intermittent sidewalk coverage is provided on Dutton Avenue with significant gaps on the east side of the street. Sidewalks are provided along the property frontages on the west side of Dutton Avenue.

Bicycle Facilities

The 2018 Caltrans Highway Design Manual classifies bikeways into four categories:[119]

- **Class I Multi-Use Path—**a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- **Class II Bike Lane—**a striped and signed lane for one-way bike travel on a street or highway.
- **Class III Bike Route—**signing only for shared use with motor vehicles within the same travel lane on a street or highway.
- **Class IV Bikeway—**also known as a separated bikeway, a Class IV Bikeway is for the exclusive use of bicycles and includes a separation between the bikeway and the motor vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

There are currently no bicycle facilities on Dutton Avenue along the project frontage so bicyclists ride in the roadway and/or on sidewalks along Dutton Avenue and other streets near the site. Class II bicycle lanes are planned for Dutton Avenue from Hearn Avenue to the southerly city limits along the Dutton Avenue extension as indicated in the City's Bicycle and Pedestrian Master Plan.[120]

[119] California Department of Transportation (Caltrans). 2018. Highway Design Manual, 6th Edition.
[120] City of Santa Rosa. 2018. Bicycle and Pedestrian Master Plan.

Transit

Sonoma County Transit provides transit service to the City. Route 42 makes a stop at the Bellevue Avenue/Moorland Avenue intersection, approximately 0.80 mile to the southeast, which is the closest transit stop located near the project. Route 42 operates Monday through Friday with approximately one-hour headways between 7:10 a.m. and 5:30 p.m. Weekend service is not provided along this route.

Would the project:

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

Less than significant impact.

Pedestrian Facilities

Due to the lack of any nearby pedestrian generators, the proposed project would be expected to result in little pedestrian traffic. As the area surrounding the project site develops further some pedestrian demand may be expected, but it is anticipated that facilities would be provided as part of such developments, providing a connected system for pedestrian travel. The proposed project would only be available to CCI employees and guests and would not generate significant demand for pedestrians. As a result, the proposed project would not conflict with a program plan, ordinance or policy addressing the circulation system, including pedestrian facilities. Therefore, impacts would be less than significant.

Bicycle Facilities

There are currently no bicycle facilities on Dutton Avenue along the project frontage so bicyclists ride in the roadway and/or on sidewalks along Dutton Avenue and other streets near the site. Class II bicycle lanes are planned for Dutton Avenue from Hearn Avenue to the southerly city limits along the Dutton Avenue extension as indicated in the City's Bicycle and Pedestrian Master Plan. The existing width of the section of Dutton Avenue fronting the project site is adequate to accommodate this planned future facility, which, when constructed, would improve biking conditions for cyclists traveling to the site. In addition, the project does not result in any impediment to these planned improvements. Furthermore, the proposed project would include a minimum of 16 bicycle parking stalls on the project site for any future bicyclists. As a result, the proposed project would not conflict with a program plan, ordinance or policy addressing the circulation system, including bicycle facilities. Therefore, impacts would be less than significant.

Transit

While the nearest bus stop is not within a 0.5-mile walking distance of the project site, employees could bike or walk to the nearest bus stop at Bellevue Avenue/Moorland Avenue, which is approximately 0.8 mile away from the site. Transit facilities serving the project site are generally adequate and would be expected to be expanded as the surrounding area develops and creates additional demand. As described in Sections 2.11, Land Use, and 2.14, Population and Housing, the proposed project would be consistent with existing land use designations and would not result in a significant new source of population or employment opportunities that could result in significant

demand for transit. As a result, the proposed project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit facilities. Therefore, impacts would be less than significant.

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

Less than significant impact. SB 743 established a change in the metric to be applied to determining transportation impacts associated with development projects. Rather than the delay-based criteria associated with a Level of Service analysis, the increase in (VMT) as a result of a project will be the basis for determining environmental impacts. In establishing their own standards, the City relied upon guidance provided by the California Governor's Office of Planning and Research (OPR) in the publication Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, 2018.

OPR guidance for commercial uses and the SCTA model use a metric of VMT per capita for employees. A project exceeding a level of 15 percent below the existing regional VMT per capita may indicate a significant transportation impact. OPR encourages the use of screening maps to establish geographic areas that achieve the 15 percent below regional average thresholds, allowing jurisdictions to "screen" projects in those areas from quantitative VMT analysis since impacts can be presumed to be less than significant. The SCTA prepared a draft screening map for the City of Santa Rosa that shows the project site to be within a screened area.[121] As a result, the project is located within an area that has been evaluated by the SCTA to not have significant VMT impacts and the proposed project would not conflict with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, impacts related to VMT associated with employee travel would be less than significant.

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

Less than significant with mitigation incorporated. As part of the Focused Traffic Study prepared for the project, W-Trans evaluated sight distances along Dutton Avenue and at the project driveway to determine if stopping distances would be sufficient. Sight distance is the criteria used by the Highway Design Manual to determine how many feet would be needed at an intersection to ensure drivers could come to a full stop while traveling at the speed limit. Dutton Avenue has a posted speed limit of 25 mph, which requires a minimum stopping distance of 150 feet.[122] According to the Focused Traffic Study, sight lines at the driveway extend more than 150 feet to the south direction, which is more than adequate for the posted speed limit. Sight distance to the north is adequate since there is an empty parcel just north of the proposed project driveway at Dutton Avenue.

When Dutton Avenue is extended from its existing terminus to Hearn Avenue, it is anticipated that the speed limit will increase, likely from 25 mph to 35 mph, increasing the required minimum stopping sight distance from 150 to 250 feet. Based on the preliminary alignment of the road extension, it is expected adequate stopping sight distance will be retained if a clear line of sight from the project driveway is maintained. It is possible that project landscaping that is not maintained

[121] W-Trans. March 9, 2021. Focused Traffic Study for the Canine Companions CEDC Expansion Project.
[122] Ibid.

could become overgrown and obscure sight lines on Dutton Avenue looking north. As shown in Exhibit 9, proposed landscaping would include street trees approved by the City along the project frontage with Dutton Avenue. Implementation of MM TRANS-1 would ensure the project includes low-profile landscape landscaping and trees would be installed to prevent them from blocking sight lines from existing or proposed driveways or side streets. As a result, the proposed project would not substantially increase hazards due to geometric design. Therefore, impacts would be less than significant with mitigation incorporated.

d) Result in inadequate emergency access?

Less than significant impact. The proposed project would provide at least two full access points (a primary vehicular access point from an existing driveway north of the CCI Headquarters and a secondary point of access north of the Dutton Avenue/King Court intersection) consistent with California Fire Code standards. Emergency response vehicles could access the site via the existing driveways. Based on a standard-sized fire truck and the proposed site plan, on-site circulation would be adequate to accommodate emergency vehicle turning-movements.[123] As a result, the proposed project would result in adequate emergency access. Therefore, impacts would be less than significant.

Mitigation Measures

MM TRANS-1 Low-Profile Landscaping

Prior to issuance of issuance of construction permit, the City of Santa Rosa Building Division shall verify that the proposed landscaping and trees proposed adjacent to Dutton Avenue would not impede sight lines along Dutton Avenue at plant maturity.

[123] W-Trans. March 9, 2021. Focused Traffic Study for the Canine Companions CEDC Expansion Project.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.18 Tribal Cultural Resources *Would the project:*				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) 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	☐	☐	☒	☐
b) 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.	☐	☒	☐	☐

Environmental Evaluation

Setting

This section describes the existing TCRs setting and potential effects from project implementation on the site and its surrounding area. Conclusions are based on initial consultation with the NAHC and subsequent consultation with tribal representatives identified by the NAHC who may have interest in or additional information on TCRs that may be impacted by project development. Copies of all consultation conducted by FCS and the City of Santa Rosa can be found in Appendix C. The review presents the methods employed to identify TCRs, assesses potential impacts to those resources, and presents recommendations to address potential impacts.

Native American Heritage Commission

On November 19, 2020, FCS sent a request to the NAHC to determine whether any sacred sites are listed on its Sacred Lands File for the project area. A response was received on December 2, 2020, indicating that the Sacred Lands File search was negative for Native American TCRs within the area. The NAHC also provided a list of eight additional tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by the proposed project are addressed, FCS sent a letter containing project information and requesting any additional information to all eight tribal representatives on December 7, 2020. A response was received from Lytton Rancheria on December 8, 2020, stating that there may be potential for finding TCRs on the site, and that the Tribe would determine whether further consultation with the City is necessary. Pursuant to AB-52, the City also sent project notification letters to Lytton and Graton Rancherias on March 24, 2021. No additional responses have been received to date. Copies of correspondence with the NAHC and Tribal representatives can be found in Appendix C.

Tribal Cultural Resources

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

a) 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

Less that significant impact. A review of the CRHR, local registers of historic resources, and a records search conducted at the NWIC failed to identify any listed or eligible TCRs that may be adversely affected by the proposed project. An NAHC Sacred Lands File search also indicated that there are no recorded or eligible TCRs within the project site, and outreach to tribal representatives identified by the NAHC did not result in the identification of additional resources. Therefore, impacts to eligible or listed TCRs would be less than significant.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

Less than significant impact with mitigation incorporated. Pursuant to AB52, the City notified Lytton and Graton Rancherias about the project on March 24, 2021. As of this date, no responses have been received. Additionally, Lytton Rancheria informed the City on April 5, 2021 that they do not request further consultation.[124] All non-confidential NAHC and Tribal correspondence can be found in Appendix C. Should any undiscovered TCRs be encountered during project construction, implementation of MM CUL-1 and MM CUL-2 would reduce potential impacts to a less than significant level.

Mitigation Measures

Implement MM CUL-1 and CUL-2.

[124] Email correspondence. Kristinae Toomians, City of Santa Rosa, Senior Planner. April 5, 2021.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.19 Utilities and Service Systems *Would the project:*				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Environmental Evaluation

Setting

Water Supply

A majority of the City's water supply is derived from the Russian River watershed and is delivered under contractual agreement by Sonoma Water. Sonoma Water holds water rights to divert 92 million gallons of water per day (mgd) with an annual maximum of 75,000 AFY from the Russian River. Sonoma Water also has three groundwater wells in the Santa Rosa Plain, which provide an average additional supply of 3,870 AFY.[125] The City utilized 16,679 acre-feet in 2015 and expected the demand to rise to 28,840 acre-feet by 2040.[126] Table 17 summarizes the projected Sonoma Water supply and demand during dry years.

[125] City of Santa Rosa. 2009. Santa Rosa General Plan 2035, Public Services and Facilities Element, page 6-8.
[126] City of Santa Rosa. 2015 Urban Water Management Plan (UWMP), page ES-2. Website: https://srcity.org/DocumentCenter/View/13875/Urban-Water-2015-Management-Plan-Without-Appendices. Accessed March 3, 2021.

Table 17: Projected Water Supply and Demand Dry Water Year Comparison

Multiple Dry Years Supply and Demand Comparison (AFY)		2020	2025	2030	2035	2040
First Year	Supply Totals	24,289	25,730	26,946	28,243	28,280
	Demand Totals	24,289	25,730	26,946	28,243	28,280
	Difference	0	0	0	0	0
Second Year	Supply Totals	24,289	25,730	26,946	28,243	28,280
	Demand Totals	24,289	25,730	26,946	28,243	28,280
	Difference	0	0	0	0	0
Third Year	Supply Totals	24,289	25,730	26,946	28,243	28,280
	Demand Totals	24,289	25,730	26,946	28,243	28,280
	Difference	0	0	0	0	0
Fourth Year (Optional)	Supply Totals	24,289	25,730	26,946	28,243	28,280
	Demand Totals	24,289	25,730	26,946	28,243	28,280
	Difference	0	0	0	0	0

Notes:
AFY = acre-feet/year
Source: City of Santa Rosa 2015 UWMP, Table 7-4.

Stormwater

Stormwater generated in Santa Rosa drains through six drainage basins to the Laguna de Santa Rosa. The largest drainage basin includes Santa Rosa Creek, which drains the northern Santa Rosa area by six major creeks and various tributaries. Four creeks (Brush, Austin, Spring, and Matanzas) primarily drain the easterly portion, while Paulin and Piner Creeks drain the westerly portion. Santa Rosa Creek also drains stormwater runoff generated downtown and in surrounding neighborhoods. The southern area of the City is susceptible to flooding from stormwater flows, in particular near Colgan Creek and Roseland Creek.[127] The City's SUSMP requires projects to design and implement post-development measures to reduce the potential stormwater impacts to local drainages.[128]

Wastewater

The City's existing water distribution system is divided into 18 major pressure zones and several smaller sub-zones that are served by pipelines ranging in diameter from 4 to 24 inches. The majority of services are provided via 6-inch to 12-inch diameter mains.[129] The City's Utilities Department is responsible for the operation and management of the Santa Rosa Subregional Water Reclamation System, which operates the Laguna Wastewater Treatment Plant (WWTP). The Laguna WWTP is a tertiary level treatment facility that has an average daily dry weather flow of 16.5 mgd and is

[127] City of Santa Rosa. 2009. Santa Rosa General Plan 2035. Public Services and Facilities Element, page 6-13
[128] City of Santa Rosa. 2009. Santa Rosa General Plan 2035 Draft EIR, page 4.H-6.
[129] City of Santa Rosa. 2015 Urban Water Management Plan (UWMP), page 3-4. Website: https://srcity.org/DocumentCenter/View/13875/Urban-Water-2015-Management-Plan-Without-Appendices. Accessed March 3, 2021.

permitted for 21.34 mgd average daily dry weather flow.[130] The Laguna WWTP serves the cities of Santa Rosa, Rohnert Park, Sebastopol, and Cotati. In 2015, the Laguna WWTP treated an estimated 11.7 mgd.[131,132] The primary point of discharge is via Delta Pond at the confluence of Santa Rosa Creek and Laguna de Santa Rosa. The North Coast RWQCB regulates wastewater discharges, which cannot exceed 5 percent of the Russian River flow.[133]

Solid Waste

Recology provides solid waste and recycling collection services to commercial and residential customers within the City. The City and Recology maintain an exclusive franchise agreement for the collection of solid waste, organic waste, and recyclable materials in the City pursuant to Chapter 9-12 of the City Code. Sonoma County disposes of solid waste to Redwood Sanitary Landfill, Potrero Hills Landfill, Vasco Road Landfill, and Keller Canyon Landfill, because the Central Disposal Facility that previously served the County is no longer operational. According to Table 18, the closest landfill to the project site, Redwood Sanitary Landfill in Novato, has a permitted daily capacity of 2,300 tons and a total remaining permitted capacity of 26 million tons through 2039.[134]

The State of California has mandated a 50 percent waste diversion rate that must be met by all counties. The waste diversion rate is expected to rise, due to continued waste reduction programs such as composting, special waste, and household toxics. The County has also adopted several waste reduction initiatives, including the Carryout Bags Ordinance and Sonoma Green Business Program, to promote and divert the amount of waste away from landfills.[135]

Table 18: Landfill Facility Detail

Landfill	Distance from Project Site	Remaining Capacity	Daily Permitted Capacity
Potrero Hills Landfill	94 miles	13,872,000 cubic yards	4,330 tons/day
Redwood Landfill	28 miles	26,000,000 cubic yards	2,300 tons/day
Keller Canyon Landfill	99 miles	63,408,410 cubic yards	3,500 tons/day
Source: California Department of Resources Recycling and Recovery (CalRecycle). Solid Waste Information System (SWIS) Facility Detail. 2021.			

Electricity and Natural Gas

PG&E would provide natural gas to the proposed project. The proposed project would be served with electricity generated by Sonoma Clean Power and delivered by PG&E. No electricity or natural gas facilities are known to exist on-site.

[130] City of Santa Rosa. 2015 Urban Water Management Plan (UWMP), page 6-12. Website: https://srcity.org/DocumentCenter/View/13875/Urban-Water-2015-Management-Plan-Without-Appendices. Accessed March 3, 2021.
[131] City of Santa Rosa. 2015 Urban Water Management Plan (UWMP), page 6-14. Website: https://srcity.org/DocumentCenter/View/13875/Urban-Water-2015-Management-Plan-Without-Appendices. Accessed March 3, 2021.
[132] 4,274,840,000 gallons annually = 11,711,890 gallons per day = 11.7 mgd
[133] Ibid.
[134] CalRecycle. 2017. Redwood Landfill. Website: http://www.calrecycle.ca.gov/SWFacilities/Directory/21-AA-0001/Detail/. Accessed March 3, 2021.
[135] Sonoma County Waste Management Agency. Sonoma County 2018 Recycling Guide. Website: http://www.recyclenow.org/pdf/2018-Recycling-Guide-Condensed-English-Rev25-for-web.pdf. Accessed March 3, 2021.

Telecommunications

Local telephone service would be provided by AT&T and cable television would be provided by Comcast. No telecommunications facilities are known to exist on-site.

Would the project:

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

Less than significant impact. The proposed project would not remove or relocate any existing water, wastewater, stormwater drainage, electric power, natural gas, or telecommunications facilities because none currently exist on the project site. As part of construction, the proposed project would install potable water and wastewater lines that would connect to existing connections contained in Dutton Avenue. Additionally, the dog run areas would drain to a sewer connection with a switch valve that would go to the storm drain system during rain events. Construction of new water and wastewater connections would be required to abide by applicable federal, State, and local regulations, as well as mitigation measures outlined in this document, to avoid significant environmental impact. As described further in Impact 2.18(b), the proposed project would be served by sufficient water supply and would not require new or expanded water distribution facilities. As described in Impact 2.18(c), the proposed project would be served by sufficient wastewater treatment capacity and would not require new or expanded wastewater treatment facilities.

In order to reduce the release of pollutants into stormwater from construction and development, the City implements a LID program to treat stormwater on-site and reduce peak stormwater flows. As described further in Impact 2.10(c), the proposed project would include stormwater treatment landscaping, a lawn area, and trees that would further prevent pollutants from entering the storm drainage system. Additionally, the dog run areas would drain to a sewer connection with a switch valve that would go to the storm drain system during rain events. The proposed project would be required to submit a Stormwater LID to the City, which would determine the need for BMPs. Construction of project stormwater infrastructure would be required to abide by applicable federal, State, and local regulations, as well as mitigation measures outlined in this document, to avoid significant environmental impact. As discussed in Impact 2.10(c), the stormwater system has been designed and sized to appropriately handle stormwater flows generated on the project site and would not require new or expanded off-site stormwater facilities.

The proposed project would include new underground electric power, natural gas, and telecommunications connections in the immediate proximity of the project site. The proposed project would not remove or replace natural gas or telecommunications facilities because none currently are known to exist on-site. Electricity and natural gas connections would be coordinated with PG&E. Construction of these connections would be required to abide by applicable federal, State, and local regulations, as well as mitigation measures outlined in this document, to avoid significant environmental impact.

In summary, the proposed project would not require the relocation or construction of new water, wastewater, storm drainage, electrical power, natural gas, or telecommunications facilities outside of those proposed on-site and considered within this Draft IS/MND. Therefore, impacts would be less than significant.

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

Less than significant impact. As described in the R Specific Plan EIR, water demand was estimated using residential equivalency factors (REFs) that translate nonresidential square footages into equivalent residential use.[136] As shown in Table 19, the project's uses would translate to approximately 28 REF or about 28 single-family detached homes. Using the project residential water use factor of 100,000 gallons per detached residential unit per year, the proposed project would result in 2,800,000 gallons per year or 8.6 AFY.

Table 19: Project REF Factor

Land Use	Area per REF (square feet)	Development Potential of Proposed Project (square feet)	Residential Dwelling Units	Residential Equivalency Factors (REF)
Light/General Industrial	1,300	36,143	n/a	28
Source: Santa Rosa. 2012. Roseland Area/Sebastopol Road Specific Plan EIR, page 42. Table 3.15-1 Water Demand Generated By the Proposed Project Above Existing Demand.				

According to the City's UWMP, the project's water demand of 8.6 AFY represents less than one percent of the City's total projected water supply for 2040, which is about 10 billion gallons (31,540 acre-feet), assuming it is a normal year.[137] As shown in Table 17, the City anticipates sufficient capacity would be available to accommodate water demand for the entire City during normal, dry, and multiple dry years through 2040. As a result, there would be sufficient water supplies to serve the project during normal, dry, and multiple dry years, and impacts would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than significant impact. Wastewater generated in the City is treated at the Laguna WWTP. The facility has an average daily dry weather flow of 16.5 mgd and is permitted to treat 21.34 mgd,[138] leaving 4.84 mgd available for treatment to accommodate future growth in the City.[139]

[136] Michael Baker International. May 2016. Roseland Area/Sebastopol Road Specific Plan, Page 3.15-6.
[137] City of Santa Rosa. 2016. 2015 Urban Water Management Plan (UWMP). June. Website: https://www.srcity.org/1172/Planning-Documents. Accessed July 23, 2019.
[138] City of Santa Rosa. 2009. Santa Rosa General Plan 2035 Environmental Impact Report. March.
[139] Ibid.

For planning purposes, the City uses a nonresidential wastewater generation rate of 30 gallons per capita per day (GPCD). As a result, the proposed project's 30 full-time employees would generate an estimated 900 gallons of wastewater per day or 0.0009 mgd. In addition, wastewater generated by the dog run play areas would contribute to project wastewater generation. The projected sewage generation is less than .01 percent of the Laguna WWTP capacity allocated to Santa Rosa. As a result, the Laguna WWTP would contain sufficient capacity to serve the expected wastewater demand of the proposed project. Therefore, impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than significant impact. During construction, the proposed project would not demolish any existing structure because none currently exist on the project site. The closest landfills would contain sufficient capacity to handle any construction waste. In addition, construction waste would be temporary and therefore, would not result in a significant impact.

The proposed addition of 30 full-time employees and associated dogs would result in an increased demand for solid waste services. The California Department of Resources Recycling (CALRecycle) estimates that the average per capita solid waste generation rate is 4.1 pounds of solid waste per day per person.[140] Therefore, the proposed project would generate an estimated 123[141] pounds of solid waste per day (0.06 tons per day) and 44,895[142] pounds of solid waste per year (22 tons per year). As shown in Table 18, Redwood Landfill in Marin County, Keller Canyon Landfill in Contra Costa County, or Potrero Hills Landfill in Solano County contain sufficient maximum capacity to serve the project. In addition, the proposed project would represent less than .001 percent of the landfills' daily permitted capacity.

Consistent with California AB 341 and AB 1826, the proposed project would be required to provide a recycling program that would divert recyclables and organic recyclable materials, such as yard trimmings, from landfills. Project waste diversion measures would contribute toward achieving a 50 percent waste diversion as mandated by the California Integrated Waste Management Act. As a result, the proposed project would not generate solid waste in excess of State or local standards or exceed the capacity of local infrastructure. Therefore, impacts would be less than significant.

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

Less than significant impact. Recology is the City's franchise waste hauler and provides solid waste, organic, and recyclable material pick up to residential and nonresidential customers within the city limits. Solid waste disposal would follow the requirements of Recology, which must adhere to federal, State, and local statutes and regulations related to the collection and management of solid waste. Recology provides separate collection containers to its customers for organic and recyclable materials, thereby allowing them to be separated from the solid waste stream. Recology would

[140] Michael Baker International. May 2016. Roseland Area/Sebastopol Road Specific Plan.
[141] Calculation: [(4.1 pounds of solid waste per employee per day) x (30 employees)] = 123 pounds of solid waste per day.
[142] Calculation: [(123 pounds of solid waste per day) x (365 days per year)] = 44,895 pounds of solid waste per year.

provide the proposed project with dumpsters (or other containers) for organics and recycling. In addition, as described in Impact 2.19(d), the proposed project would comply with AB 341 and AB 1826. Because solid waste disposal and management would be compliant with federal, State, and local statutes and regulation, impacts would be less than significant.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

An SRA is an area of the State in which the financial responsibility of preventing and suppressing fires has been determined by CAL FIRE pursuant to Public Resources Code Section 4125, to be primarily the responsibility of the State. The proposed project is not located in an SRA.[143] An LRA is an area designated by CAL FIRE pursuant to Government Code Section 51178 that is not within an SRA and is managed at the local level. The project site is not located in a designated "Very High Fire Hazard Severity Zone" in an LRA.[144]

The United States Forest Service defines the wildland urban interface (WUI) zone qualitatively as a place where "humans and their development meet or intermix with wildland fuel."[145] The project site is not located in a WUI zone.[146]

The City was significantly impacted by the Tubbs and Nuns fires in October 2017, and the Glass Fire in 2020. The Tubbs fire burned 36,432 acres in Napa and Sonoma counties, destroyed 5,300

[143] California Department of Forestry and Fire Protection (CAL FIRE). 2019. California State Responsibility Area (SRA). Website: https://www.arcgis.com/home/webmap/viewer.html?layers=5ac1dae3cb2544629a845d9a19e83991. Accessed March 4, 2021.
[144] California Department of Forestry and Fire Protection (CAL FIRE). 2008. Very High Fire Hazard Severity Zones in LIRA (as recommended by CAL FIRE), Santa Rosa. Website: https://osfm.fire.ca.gov/media/6005/santa_rosa.pdf. Accessed March 4, 2021.
[145] Stein, Susan M. et al. 2008. Wildfire, Wildlands, and People: Understanding and Preparing for Wildfire in the Wildland-Urban Interface. United States Department of Agriculture (USDA), Forest Service. May 8.
[146] City of Santa Rosa. 2009. City of Santa Rosa General Plan 2035.

structures, and killed 22 civilians. The Nuns fire burned 54,382 acres, destroyed more than 1,200 structures, and killed 3 people.[147] The Glass Fire burned over 67,484 acres, and destroyed 1,555 structures, including 308 homes and 343 commercial buildings in Napa County, as well as 334 homes in Sonoma County. The project site was not impacted by the Tubbs, Nuns, or Glass Fires.

The City's Urban Interface Fire Area Map illustrates wildlands that are susceptible to fire hazards and are near Urban areas. The project site is not located in or near any of those areas.[148]

Would the project:

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

Less than significant impact. Primary vehicular access to the project site would be provided from Dutton Road. The proposed project would provide two driveways for site access: 1) existing from the circular drive off Dutton Avenue that serves the existing CCI operations and 2) new driveway access from just north of the Dutton Avenue/Duke Court intersection. As discussed in Impact 9(f), the proposed project would not conflict with or obstruct an adopted emergency response plan. In compliance with the City Code and the California Fire Code, all the project roadways would be accessible for fire trucks and emergency vehicles. Therefore, impacts would be less than significant.

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?

Less than significant impact. The project site contains mostly flat, level, and undeveloped land. As a result, the proposed project would not exacerbate wildfire risks due to development on a severe slope. The BAAQMD collects wind speed data from the City of Napa, which is approximately 25 miles southeast of Santa Rosa. The area is located in a similar climate as Santa Rosa and as such, has similar average wind speeds. The BAAQMD data demonstrates an average wind speed of 5.67 mph from August 2018 to July 1019. The project site would be expected to experience similar wind speed conditions as experienced in Napa and would not be susceptible to significantly high wind speeds that could exacerbate risk of spreading wildfires. Given that the project site is not located in or near an area of steep terrain nor experiences consistent high winds, the project site would not be prone to greater wildfire risk than other properties in the vicinity. Therefore, impacts would be less than significant.

[147] SFGATE. 2017. Tubbs Fire in Sonoma County is most destructive in State history. October. Website: https://www.sfgate.com/bayarea/article/Little-tears-of-joy-falling-from-the-skies-12293647.php. Accessed March 4, 2021.
[148] City of Santa Rosa Information Technology. 2009. Wildland – Urban Interface Fire Area Map.

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?

Less than significant impact. The project is located in a developed area surrounded by existing roadways, and by Colgan Creek, located directly to the northwest of the project site. The project site is not located in and SRA or in a designated "Very High Fire Hazard Severity Zone" in an LRA.

The proposed project would not require the installation or maintenance of any roads or fuel breaks to prevent the exacerbation of fire risk. The proposed project would not require emergency water sources, because potable water is currently provided by the City. The proposed project would also include new electric power, natural gas, and telecommunications connections in the immediate proximity of the project site, all of which would be undergrounded, thereby minimizing potential ignition and related fire risk above ground. Therefore, impacts related to infrastructure that exacerbates fire risk would be less than significant.

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?

Less than significant impact. The project site and surrounding area is flat and does not contain steep slopes. Although the City of Santa Rosa has experienced significant damage from recent wildfires, the project site has not previously been directly damaged. Additionally, the project site does not contain post-fire slope instability nor is it directly downslope from affected areas. As a result, it would not expose people to significant risks of downslope or downstream flooding. Therefore, impacts would be less than significant.

Mitigation Measures

None required.

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

Environmental Evaluation

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

Less than significant with mitigation incorporated. The proposed project may result in impacts associated with air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, and transportation that would be significant if left unmitigated. Implementation of mitigation measures as outlined in the respective sections of this Draft IS/MND would mitigate all potential impacts on these resources to levels that are less than significant.

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

Less than significant with mitigation incorporated. Implementation of mitigation as outlined in this Draft IS/MND would reduce all potentially significant impacts to less than significant. Given that all impacts to a less than significant level with mitigation and given the project's size, the incremental effects of this project are not considerable relative to the effects of past, current, and probable future projects. Therefore, the proposed project would not result in cumulatively considerable impacts, and impacts would be less than significant with mitigation incorporated.

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

Less than significant with mitigation incorporated. As described throughout the preceding checklist portion of this Draft IS/MND, the proposed project would not have any substantial environmental effects on human beings, either directly or indirectly. All impacts identified throughout this document either do not require mitigation or would be mitigated to levels that are less than significant. In addition, the proposed project would be required to comply with existing regulations as discussed throughout the Draft IS/MND. The proposed mitigation measures, once implemented, and compliance with existing regulations would ensure that no substantial adverse effects on human beings would result from the proposed project. Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

Implement MM AIR-1, MM BIO-1a, MM BIO-1b, MM BIO-2, MM CUL-1, MM CUL-2, MM GEO-1, MM GEO-2, MM GHG-1, MM HAZ-1, and MM TRANS-1.

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