



TOWN OF WINDSOR

Windsor Chevron

Initial Study/Mitigated Negative Declaration

Town Project File No. 17-21

August 2021

1.1 INTRODUCTION AND REGULATORY GUIDANCE

This document contains an initial study, with supporting environmental studies, which concludes that a mitigated negative declaration is the appropriate California Environmental Quality Act (CEQA) document for the Windsor Chevron (proposed project). This Mitigated Negative Declaration has been prepared in accordance with Public Resources Code Section 21000 et seq., and the CEQA Guidelines, California Code of Regulations Section 15000 et seq.

An initial study is conducted by a lead agency to determine whether a project may have a significant effect on the environment. In accordance with CEQA Guidelines Section 15063, an environmental impact report (EIR) must be prepared if an initial study indicates that the proposed project under review may have a potentially significant impact on the environment that cannot be initially avoided or mitigated to a level that is less than significant. A negative declaration may be prepared if the lead agency also prepares a written statement describing the reasons why the proposed project would not have a significant effect on the environment and, therefore, why it does not require the preparation of an EIR (CEQA Guidelines Section 15371). According to CEQA Guidelines Section 15070, a negative declaration shall be prepared for a project subject to CEQA when either:

- a) The initial study shows there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- b) The initial study identifies potentially significant effects, but:
 - (1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and
 - (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

If revisions are adopted in the proposed project in accordance with CEQA Guidelines Section 15070(b), including the adoption of the mitigation measures in this document, a mitigated negative declaration can be prepared.

1.2 LEAD AGENCY

The lead agency is the public agency with primary responsibility over a proposed project. Where two or more public agencies will be involved with a project, CEQA Guidelines Section 15051 provides criteria for identifying the lead agency. In accordance with CEQA Guidelines Section 15051(b)(1), “the Lead Agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose.” Based on the criterion above, the Town of Windsor is the lead agency for the proposed project.

1.3 PURPOSE AND DOCUMENT ORGANIZATION

The purpose of this Initial Study is to evaluate the potential environmental impacts of the proposed project. This document is divided into the following sections:

1.0 INTRODUCTION

- 1.0 Introduction** – This section provides an introduction and describes the purpose and organization of the document.
- 2.0 Project Information** – This section provides general information regarding the project, including the project title, lead agency and address, contact person, brief description of the project location, General Plan land use designation and zoning district, identification of surrounding land uses, and identification of other public agencies whose review, approval, and/or permits may be required. Also included in this section is a checklist of the environmental factors that are potentially affected by the project.
- 3.0 Project Description** – This section describes the proposed project in detail.
- 4.0 Environmental Checklist** – This section describes the environmental setting and overview for each of the environmental subject areas, and evaluates a range of impacts classified as “no impact,” “less than significant impact,” “less than significant impact with mitigation incorporated,” and “potentially significant impact” in response to the environmental checklist.
- 5.0 Threshold Question Comparison Matrix** – Since the initial documentation and planning of this project in 2018, the state has adopted updates to the State CEQA Guidelines. These updates include changes to the threshold questions in Appendix G, which the Town uses to evaluate the impacts in Section 4.0 Environmental Checklist. As such, a matrix is included in Section 5.0 that shows where in Section 4.0 information is included that provides analysis consistent with the updated Appendix G questions.

1.4 EVALUATION OF ENVIRONMENTAL IMPACTS

Section 4.0, Environmental Checklist, is the analysis portion of this Initial Study. The section evaluates the potential environmental impacts of the project. Section 4.0 includes 21 environmental issue subsections, including the CEQA Mandatory Findings of Significance. The environmental issue subsections, numbered 1 through 21, consist of the following:

- | | |
|--|--|
| 1. Aesthetics | 12. Mineral Resources |
| 2. Agricultural and Forestry Resources | 13. Noise |
| 3. Air Quality | 14. Population and Housing |
| 4. Biological Resources | 15. Public Services |
| 5. Cultural Resources | 16. Recreation |
| 6. Energy | 17. Transportation/Traffic |
| 7. Geology and Soils | 18. Tribal Cultural Resources |
| 8. Greenhouse Gas Emissions | 19. Utilities and Service Systems |
| 9. Hazards and Hazardous Materials | 20. Wildfire |
| 10. Hydrology and Water Quality | 21. Mandatory Findings of Significance |
| 11. Land Use and Planning | |

Each environmental issue subsection is organized in the following manner:

The **Discussion of Impacts** provides a detailed discussion of each environmental issue checklist question. The level of significance for each topic is determined by considering the predicted magnitude of the impact. Four levels of impact significance are evaluated in this Initial Study:

No Impact: No project-related impact on the environment would occur with project development.

Less Than Significant Impact: The impact would not result in a substantial adverse change in the environment. This impact level does not require mitigation measures.

Less Than Significant Impact with Mitigation Incorporated: An impact that may have a “substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project” (CEQA Guidelines Section 15382). However, the incorporation of mitigation measures that are specified after analysis would reduce the project-related impact to a less than significant level.

Potentially Significant Impact: An impact that is “potentially significant” but for which mitigation measures cannot be immediately suggested or the effectiveness of potential mitigation measures cannot be determined with certainty, because more in-depth analysis of the issue and potential impact is needed. In such cases, an EIR is required.

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1. **Project title:** Windsor Chevron Project
2. **Lead agency name and address:** Town of Windsor
P.O. Box 100
Windsor, CA 95492
3. **Contact person and phone number:** Kim Voge, Planner III; (707) 838-1106
4. **Project location:** The project site is located at 9120 and 9200 Old Redwood Highway in Windsor; approximately 300 feet north of the intersection of Old Redwood Highway and Windsor River Road on APNs 161-070-034 and 161-070-035, respectively. The project also includes offsite stormwater infiltration improvements at the Town of Windsor Public Works employee parking lot located at 8400 Windsor Road (on the east side of Windsor Road between Private Road F and Plant Road).
5. **Project sponsor's name and address:** Redwood Oil Company
50 Professional Center Drive
Rohnert Park, CA 94928
6. **General Plan designation:** Retail Commercial (RC)
7. **Zoning:** Community Commercial (CC) /Windsor Station Area/Downtown Specific Plan
8. **Project description:** The project proposes demolition and replacement of the existing convenience store and car wash building, as well as a new canopy extension and two new pumps.
9. **Surrounding land uses and setting:** The project site is bordered by Highway 101 to the east; commercial retail uses to the south, west, and north; and a vacant lot to the west.

10. 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.

- | | | |
|--|--|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gases | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |

2.0 PROJECT INFORMATION

- | | | |
|--|---|---|
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

11. Determination:

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Kim Voge
Printed Name

Date

Town of Windsor
Lead Agency

3.1 PROJECT LOCATION

The proposed project site is located at 9120 and 9200 Old Redwood Highway (approximately 300 feet north of the intersection of Old Redwood Highway and Windsor River Road on Assessor's Parcel Numbers [APN] 161-070-034 and 161-070-035), in Windsor, Sonoma County. The project site is bordered by Highway 101 to the east; commercial retail uses to the south, west, and north; and a vacant lot to the west (**Figures 3.0-1 and 3.0-2**). The project also includes offsite stormwater infiltration improvements at the Town of Windsor Public Works employee parking lot located at 8400 Windsor Road (on the east side of Windsor Road between Private Road F and Plant Road) as accepted by the North Coast Regional Water Quality Control Board (**Figure 3.0-5**).

3.2 PROJECT SITE

The project site includes an existing gas station with convenience store, car wash, and covered pump stations. It was constructed in 1968. The project area is approximately 1.64 acres, with approximately 77,010 square feet (sf) of pervious surfaces; 2,426 sf of landscaping; 23,592 sf of impervious surfaces; and 5,321 sf of existing buildings. As shown on **Figure 3.0-3**, the existing site layout consists of a convenience store with attached car wash and covered six-pump gas station.

EXISTING ACCESS AND PARKING

Vehicle access to the project site is via Old Redwood Highway. Pedestrian access to the project site is also available via existing pedestrian sidewalks along Old Redwood Highway. Seven paved parking spaces are located on the project site.

LAND USE

The Town of Windsor General Plan (2018) designates the project site as Retail Commercial (RC). According to the General Plan, the RC land use designation applies to uses that provide convenience goods and services for surrounding residential neighborhoods, the larger community, or subregion/region. This designation allows for retail development, including individual shops on single parcels, as well as freestanding shopping centers offering personal retail and service activities, restaurants, offices, and business services. The RC designation is generally located along major arterials and transit routes.

The project site is zoned Community Commercial. This zone accommodates local-, community-, and visitor-serving retail land uses and eating and drinking establishments, including restaurants, stores, and personal and business services. Offices are permitted as an ancillary use. The maximum permitted floor area ratio is 1.0 (Windsor 2013).

3.3 SURROUNDING LAND USES

The project site is bordered by Highway 101 to the east; commercial retail uses to the south, west, and north; and a vacant lot to the west.

3.4 PROJECT DESCRIPTION

The project proposes demolishing the existing 2,300-sf convenience store and car wash building, as well as one existing signage island. A new 5,475-sf convenience store and restaurant building would be constructed on the adjacent vacant lot (APN 161-070-035). Two additional pumps would be added to the existing six-station fueling area. A canopy extension over the new pumps would be constructed. The convenience store and fuel pumps would operate 24 hours per day. The restaurant would operate from 5:00 a.m. to 9:00 p.m. A new 2,314-sf car wash building would be constructed and would include a self-serve vacuum area. The car wash would operate from 7:00 a.m. to 7:00 p.m. daily.

The proposed project would ultimately lead to an increase of impervious surfaces from 23,592 sf to 25,392 sf; landscaping of 2,426 sf to 17,246.12 sf; and building coverage of 5,321 sf to 12,960 sf.

The proposed project also includes a 9,500-sf easement on the northwestern edge of the property for a future pedestrian promenade and overhead pedestrian bridge. This easement would include a maintenance clearing of 1,720 sf between the edge of the future overhead pedestrian bridge and the development which would result in a 10-foot setback.

Access and Parking

Vehicle access to the project site is via Old Redwood Highway. Pedestrian access to the project site is also available via existing pedestrian sidewalks along Old Redwood Highway. A total of 42 parking spaces would be provided, consisting of 7 full-size spaces, 4 clean air/vanpool/electric vehicle spaces, 3 electric vehicle charging stations, 1 liquid propane gas sales space, 16 fueling positions, 1 loading area, 3 vacuum positions, 5 car wash stacking spaces, 1 van accessible space, and 1 accessible space.

The proposed project would not impede the Town's pedestrian/bicycle bridge plan to span Highway 101 with a landing on Old Redwood Highway between the project site and the Shell Oil Station, located at 9033 Old Redwood Highway, nor would it impede the future development of steps from the pedestrian/bicycle bridge to the project site or a pathway leading south to Old Redwood Highway between the project site and Oliver's Market, located at 9230 Old Redwood Highway.

Storm Water/Low Impact Development (LID)

Due to the former leaking underground storage tank (LUST) that once existed onsite,¹ the site is not eligible for groundwater infiltration. Therefore, the project's requirements for stormwater infiltration would be addressed through off-site improvements ("off-sets"). The off-set LID improvements include curb-cuts and bioswales at the existing Town of Windsor Public Works employee parking lot located at 8400 Windsor Road, approximately half a mile southwest of the project site. As shown in **Figure 3.0-6**, the bioswales would replace existing planters in the Public Works employee parking lot. Water sheet flows into the bioswales from the surrounding parking lot and would also be fed by an underground drainpipe. The North Coast Regional Water Quality Control Board has reviewed and accepted the post-construction treatment proposal for compliance with the project's stormwater permit LID requirements.

¹ See **Section 4.9, Hazards and Hazardous Materials** for information about this LUST.

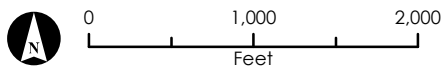


FIGURE 3.0-1
Regional Vicinity



0 200 400
FEET

FIGURE 3.0-2
Project Site



Source: ESRI.



0 50 100
FEET

FIGURE 3.0-3
Existing Site Layout



FIGURE 3.0-5
Off-Site Improvement Location



3.5 PROJECT APPROVALS

As the lead agency, the Town of Windsor has the ultimate authority for project approval or denial. As such, the following approvals would be required from the Town:

- Approval of development plans

Other Permits and Approvals

- Stormwater Pollution Prevention Plan

3.6 RELATIONSHIP OF PROJECT TO OTHER PLANS

The Town serves as the CEQA lead agency and has jurisdiction over projects within Town limits. The project area is also located within the Windsor Station Area/Downtown Specific Plan; therefore, this Initial Study incorporates by reference the Town of Windsor General Plan and the Windsor Station Area/Downtown Specific Plan. The document uses the General Plan and the Windsor Station Area/Downtown Specific Plan to establish the existing setting and thresholds of significance for potential environmental impacts. The 2040 General Plan was adopted April 4, 2018. The Windsor Station Area/Downtown Specific Plan was amended January 16, 2013.

REFERENCES

Windsor, Town of. 2013. *Windsor Station Area/Downtown Specific Plan*.

———. 2018. *2040 General Plan*.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.1 AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a,b) ***No Impact.*** The project site is surrounded by urban development including Highway 101 and commercial development. Views in the area are limited due to relatively flat topography and consist largely of single- and multi-story buildings, roadways, pole-mounted utilities, and scattered trees. The proposed buildings would be similar in height to surrounding structures and would not block surrounding views. There are no state- or county-designated scenic highways in the vicinity of the project site (Caltrans 2011). The project would have no impact on scenic resources within a state scenic highway corridor. Furthermore, the existing buildings were evaluated for historical significance in accordance with CEQA Section 15064.5(a) and were determined not to be historical resources for the purposes of CEQA (see Section 4.5).
- c) ***Less Than Significant Impact.*** The project site has been developed as a gas station since 1968 with single-story structures, parking lot, and hardscaped areas. The proposed improvements would be a continuation of the site's existing visual character and would be visually consistent with surrounding properties. The project is anticipated to improve the visual quality of the site by modernizing and replacing older buildings to create an updated, cohesive design. The project would have a less than significant impact.
- d) ***Less Than Significant Impact.*** Existing light sources include station canopy lighting, convenience store lighting, pole-mounted parking lot lighting and signage, and ground-mounted signage lighting. The project includes the demolition of the convenience store and car wash building, and construction of two commercial buildings and a gas station canopy extension with associated lighting. Lighting levels would increase due to the increase in commercial buildings, structures, and signage on the project site. However, the Town's standard conditions of approval require review of final photometrics prior to approval of improvement plans to ensure consistency with the Zoning Ordinance's standards to provide adequate light for security while controlling light spillover and glare. Compliance with Zoning Ordinance requirements would ensure impacts are less than significant. This impact would be less than significant.

4.0 ENVIRONMENTAL CHECKLIST

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.2 AGRICULTURAL 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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. 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 nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined in Public Resources Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in the loss of forestland or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

- a–e) **No Impact.** There are no agricultural or forestry uses on or in the vicinity of the project site. The California Department of Conservation (2016) Farmland Mapping and Monitoring Program designates the site and surrounding properties as Urban and Built-Up Land. The project site's zoning of Community Commercial (CC) does not permit agricultural uses. Furthermore, the site has been developed as a gas station since 1968 and is surrounded by urban development, making it unsuitable for any agricultural use. Thus, the project would not convert Important Farmland or conflict with agricultural zoning or Williamson Act contracts. Similarly, the project site does not contain any forestland or timber resources and would not result in the loss or conversion of such land or conflict with forestry zoning. There would be no impact.

Mitigation Measures

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.3 AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

The Town (including the project site) is located in Sonoma County, which is within the San Francisco Bay Area Air Basin (Basin). The proposed project is subject to the ambient air quality standards established by the Bay Area Air Quality Management District (BAAQMD), and those adopted by the California Resources Board (CARB), and the U.S. Environmental Protection Agency (EPA). The BAAQMD CEQA Air Quality Guidelines (2017a) provides significance thresholds for both construction and operation of projects. If the BAAQMD thresholds are exceeded, a potentially significant impact could result. However, ultimately the lead agency determines the thresholds of significance for impacts. If a project proposes development in excess of the established thresholds, as outlined below in Table 4.3-1, a significant air quality impact may occur and additional analysis is warranted to fully assess the significance of impacts.

**Table 4.3-1
Bay Area Air Quality Management District Emissions Thresholds**

Phase	Pollutant (lbs/day)			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Construction	54	54	82	54
Operational	54	54	82	54

Source: BAAQMD 2017.

It should be noted that a quantitative carbon monoxide (CO) impact analysis is not required by BAAQMD (comparing project emissions to the California Ambient Air Quality Standards), if all of the following criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- 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).

- a) ***Less Than Significant Impact.*** The BAAQMD adopted the 2017 Bay Area Clean Air Plan (CAP) on April 19, 2017, to comply with state air quality planning requirements set forth in the California Health & Safety Code. The 2017 CAP includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to residents in the Basin, such as particulate matter (PM₁₀ and PM_{2.5}), nitrous oxides (NO_x), reactive organic carbons (ROG), ozone, and toxic air contaminants (TACs); to reduce emissions of methane (CH₄) and other “super-greenhouse gases (GHGs)” that are potent climate pollutants in the near term; and to decrease emissions of carbon dioxide (CO₂) by reducing fossil fuel combustion.

The proposed control strategy for the CAP consists of 85 distinct measures targeting a variety of local, regional, and global pollutants. The control measures have been developed for stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. The project would comply with the following CAP control measures, as seen in Table 4.3-2.

**Table 4.3-2
Project CAP Consistency**

Control Measure	Description	Project Consistency
SS24: Sulfur Content Limits of Liquid Fuels	Revise Rule 9-1 to include fuel-specific sulfur content limits for diesel and other liquid fuels	The project would sell liquid fuels (e.g., diesel, gasoline) which would comply with BAAQMD Rule 9-1.
SS35: PM from Bulk Material Storage, Handling and Transport, Including Coke and Coal	Develop Air District rule limits to prevent and control wind-blown fugitive dust from bulk material handling operations. Establish enforceable visible emission limits to support preventive measures such as water sprays, enclosures and wind barriers.	The project would apply the BAAQMD Basic Construction Mitigation Measures which would include: <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

4.0 ENVIRONMENTAL CHECKLIST

		<ul style="list-style-type: none">• All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
TR22: Construction, Freight and Farming Equipment	Provide incentives for the early deployment of electric, Tier 3 and 4 off-road engines used in construction, freight and farming equipment. Support field demonstrations of advanced technology for off-road engines and hybrid drive trains.	Off-road construction equipment used during project construction would be Tier 3.
Source: BAAQMD 2017b.		

In addition, the BAAQMD CEQA Guidelines set forth criteria for determining consistency with the CAP. In general, a project is considered consistent if:

- a) the project supports the primary goals of the CAP,
- b) includes control measures, and
- c) does not interfere with implementation of the CAP measures.

The proposed project would be consistent with the criteria set forth in the CAP:

- a) The project would comply with the General Plan Goal ER-4 and policies ER-4.1 and ER-4.2, which would help the Town maintain the ambient air quality standards and would require that development comply with federal and state air quality standards (see Issues b-c, below). As shown in Table 4.3-2, the project would be consistent with Goals SS24, SS35, and TR22 from the CAP.
- b) The project would include the BAAQMD Basic Construction Mitigation Measures (see Issue b, below) and would comply with all applicable BAAQMD rules and regulations.
- c) The project would generate air quality emissions below the BAAQMD criteria pollutant thresholds (see Issues b-c, below), would not be considered to be a substantial emitter of criteria pollutants, and would not contribute to any non-attainment areas in the Basin.

Therefore, as the project would comply with the CAP criteria for consistency, the project would have a less than significant impact and would not conflict with the regional air quality plan.

- b) ***Less Than Significant Impact.***

Short-term Construction Emissions

The project involves construction activities associated with demolition, site preparation, grading, paving, construction, and architectural coating applications. Exhaust emission factors for typical diesel-powered heavy equipment are based on the California Emissions Estimator Model version 2016.3.2 (CalEEMod) program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. The analysis of daily construction emissions has been prepared utilizing CalEEMod. See Appendix A, *Air Quality/Greenhouse Gas Analysis Data*, for the CalEEMod inputs and results. It is important to note that this analysis is based on a more intensive project that involves the construction of three commercial buildings, rather than the two included in the current project. The site preparation activities evaluated would not be different than those assumed in the analysis, but the modeled construction and operation scenario is more intensive than that for the proposed project, resulting in conservative calculations regarding emissions. Table 4.3-3 presents the anticipated daily short-term construction emissions.

**Table 4.3-3
Construction-Related Emissions**

Emissions Source	Pollutant (pounds/day) ¹			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Year 1				
Construction Emissions ²	31.70	25.93	2.42	1.74
<i>BAAQMD Thresholds</i>	54	54	82	54
<i>Is Threshold Exceeded?</i>	No	No	No	No
ROG = reactive organic gases; NO _x = nitrogen oxides; PM ₁₀ = particulate matter 10 microns in diameter or less; PM _{2.5} = particulate matter 2.5 microns in diameter or less				
Notes: 1. Emissions were calculated using CalEEMod, version 2016.3.2, as recommended by BAAQMD. 2. The reduction/credits for construction emissions are based on measures included in CalEEMod and as recommended by the BAAQMD Rules. The measures applied in CalEEMod include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces two times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. The emissions results in this table represent the emissions with implementation of the CalEEMod measures shown in Appendix A.				
Refer to Appendix A, <i>Air Quality/Greenhouse Gas Analysis Data</i> , for assumptions used in this analysis.				

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from demolition, construction, and paving is expected to be short term and would cease upon project completion. Additionally, most of this material is inert silicates, rather than the

complex organic particulates released from combustion sources, which are more harmful to health.

PM₁₀ and PM_{2.5} are both emitted during construction activities and as a result of wind erosion over exposed soil surfaces. Clearing and grading activities comprise the major sources of construction dust emissions, but traffic and general disturbance of the soil also generate significant dust emissions. PM₁₀ and PM_{2.5} emissions can vary greatly depending on the level of activity, the specific operations taking place, the equipment being operated, local soils, weather conditions, and other factors making quantification difficult. The highest potential for construction dust impacts would occur during the dry late spring, summer, and early fall months when soils are dry. Despite this variability in emissions, experience has shown that there are feasible control measures that can be reasonably implemented to significantly reduce PM₁₀ and PM_{2.5} emissions from construction activities. The BAAQMD CEQA guidelines recommends the implementation of the following Basic Construction Mitigation Measures, whether or not construction-related emissions exceed applicable significance thresholds:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- 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.
- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emission factors for typical diesel-powered heavy equipment are based on the CalEEMod program defaults. Variables factored into estimating the total construction emissions include: level of activity, length of construction period, number of pieces/types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site.

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials and workers to and from the site. Emitted pollutants would include ROG, NO_x, PM₁₀, and PM_{2.5}. As seen in Table 4.3-3, BAAQMD thresholds would not be exceeded during construction activities. Although construction pollutant emissions associated with the proposed project would be below BAAQMD thresholds, the Basic Construction Mitigation Measures would be implemented to further reduce emissions. This would be a less than significant impact.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are ozone precursors. In accordance with the methodology prescribed by the BAAQMD, the ROG emissions associated with paving have been quantified with CalEEMod. Architectural coatings were also quantified with CalEEMod based upon the size of the buildings. As shown in Table 4.3-3, the project would result in a maximum of 31.70 lbs/day of ROG emissions during construction activities. Further, as stated above, the inputs used for the air quality analysis were based on a more intensive project. The amount of impervious surface would be less than that used in the CalEEMod calculations as would the required architectural coatings. As such, construction ROG emissions would not exceed the BAAQMD threshold of 54 lbs/day. Therefore, there would be a less than significant impact related to ROG emissions.

Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant by the CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos-bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation (2000), serpentinite and

ultramafic rocks are not known to occur within the project area. Thus, there would be a less than significant impact related to asbestos.

Total Daily Construction Emissions

In accordance with the BAAQMD Guidelines, CalEEMod was utilized to model construction emissions for ROG, NO_x, PM₁₀, and PM_{2.5}. The greatest amount of fugitive dust emissions would be generated during the grading and building construction stages of construction. Additionally, the greatest amount of ROG emissions would typically occur during the final stages of development due to the application of architectural coatings. As indicated in Table 4.3-3, the proposed project would not result in an exceedance of any BAAQMD thresholds for ROG, NO_x, PM₁₀, and PM_{2.5}. Therefore, a less than significant impact would occur.

Long-Term (Operational) Emissions

Mobile Source Emissions

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_x, SO_x, PM₁₀, and PM_{2.5} are all pollutants of regional concern (NO_x and ROG react with sunlight to form ozone [photochemical smog], and wind currents readily transport sulfur oxides [SO_x], PM₁₀, and PM_{2.5}); however, CO tends to be a localized pollutant, dispersing rapidly at the source.

According to the *Traffic Impact Study for the Chevron Remodel* (Traffic Study) prepared by W-Trans (2018), the proposed project would generate an average of 1,540 net new daily vehicle trips. As in the air quality analysis, the Traffic Study is based on a more intensive project scenario with the development of three commercial buildings, rather than the two currently proposed (convenience store/restaurant and a car wash). Due to this difference, the calculations provided in the Traffic Study are conservative. Table 4.3-4 presents the anticipated mobile source emissions. As shown, emissions generated by vehicle traffic associated with the project would not exceed established BAAQMD thresholds. Therefore, impacts from mobile source air emissions would be less than significant.

**Table 4.3-4
Long-Term Operational Air Emissions**

Emissions Source	Pollutant (pounds/day) ¹			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Summer Emissions				
Area Source Emissions	0.36	0.00	0.00	0.00
Energy Emissions	0.00	0.07	0.00	0.00
Mobile Emissions	1.96	6.26	1.78	0.49
Total Emissions²	2.32	6.33	1.78	0.49
BAAQMD Threshold	54	54	82	54
Is Threshold Exceeded?	No	No	No	No
Winter Emissions				
Area Source Emissions	0.36	0.00	0.00	0.00

Energy Emissions	0.00	0.07	0.00	0.00
Mobile Emissions	1.63	6.36	1.79	0.50
Total Emissions²	1.99	6.43	1.79	0.50
BAAQMD Threshold	54	54	82	54
Is Threshold Exceeded?	No	No	No	No
ROG = reactive organic gases; NO _x = nitrogen oxides; CO = carbon monoxide, SO _x = sulfur dioxide PM ₁₀ = particulate matter 10 microns in diameter or less; PM _{2.5} = particulate matter 2.5 microns in diameter or less				
Notes:				
1. Emissions were calculated using CalEEMod version 2016.3.2, as recommended by BAAQMD.				
2. The numbers may be slightly off due to rounding.				
Source: Refer to Appendix A, Air Quality/Greenhouse Gas Analysis Data, for assumptions used in this analysis.				

Area Source Emissions

Area source emissions would be generated from consumer products, architectural coating, hearths, and landscaping. As shown in Table 4.3-4, area source emissions from the proposed project would not exceed BAAQMD thresholds for ROG, NO_x, PM₁₀, or PM_{2.5}.

Energy Source Emissions

Energy source emissions would be generated as a result of electricity and natural gas (non-hearth) usage associated with the proposed project. The primary use of electricity and natural gas by the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. As shown in Table 4.3-4, energy source emissions from the proposed project would not exceed BAAQMD thresholds for ROG, NO_x, PM₁₀, or PM_{2.5}.

As indicated in Table 4.3-4, operational emissions from the proposed project would not exceed BAAQMD thresholds. Thus, operational air quality impacts would be less than significant with implementation of the CalEEMod measures.

- c) **Less Than Significant Impact.** As discussed above in Issue b), the project's construction-related emissions by themselves would not have the potential to exceed the BAAQMD significance thresholds for criteria pollutants.

Since these thresholds indicate whether an individual project's emissions have the potential to affect cumulative regional air quality, it can be expected that the project-related construction emissions would not be cumulatively considerable. The BAAQMD's Basic Construction Mitigation Measures are recommended for all projects whether or not construction-related emissions exceed the thresholds of significance. Compliance with BAAQMD construction-related requirements are considered to reduce cumulative impacts at a Basin-wide level. As the project would adhere to the BAAQMD Basic Construction Mitigation Measures, construction emissions associated with the proposed project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Long-Term Emissions

The BAAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards.

Instead, a project's individual emissions contribute to existing air quality impacts. The BAAQMD developed the operational thresholds of significance based on the level above which a project's individual emissions would result in a cumulatively considerable contribution to the Basin's existing air quality conditions. Therefore, a project that exceeds the BAAQMD operational thresholds would also be a cumulatively considerable contributor to a significant cumulative impact. As shown in Table 4.3-4, the proposed project's operational emissions would not exceed BAAQMD thresholds. Further, as described above, the inputs used to achieve the results in Table 4.3-4 result in a conservative estimate of project emissions. Therefore, operational emissions associated with the proposed project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

- d) ***Less Than Significant Impact.*** Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The closest sensitive receptors are the existing mixed-use residential uses located approximately 350 feet to the south of the project site.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (adversely affecting residents, school children, hospital patients, the elderly, etc.).

The Basin is designated as attainment for CO. Emissions and ambient concentrations of CO have decreased dramatically in the Basin with the introduction of the catalytic converter in 1975. No exceedances of the California or National Ambient Air Quality Standards for CO have been recorded at nearby monitoring stations since 1991. As a result, the BAAQMD screening criteria notes that CO impacts may be determined to be less than significant if a project is consistent with the applicable congestion management plan and would not increase traffic volumes at local intersections to more than 24,000 vehicles per hour for locations in urban areas, where "urban canyons" formed by buildings tend to reduce air circulation. It should also be noted that the BAAQMD does not have a numerical threshold for operational CO emissions. Based on the scope of the proposed project, traffic would increase along surrounding roadways during operational activities. According to the traffic study, the project would generate approximately 1,540 net new daily trips; however, the intersections in the project vicinity would not exceed 24,000 vehicles per hour under future plus project conditions. Thus, the project would not contribute to or create a CO hotspot, and impacts related to CO concentrations would be less than significant.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, ozone precursors VOCs and NO_x affect air quality on a regional scale. Health effects related to ozone are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results.

Further, as discussed above, the project's air emissions would not exceed the BAAQMD criteria pollutant thresholds and CO hotspots would not occur as a result of the proposed project. Therefore, the project would not exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_x, PM₁₀, or PM_{2.5}. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons (children and the elderly) are protected. In other words, the ambient air quality standards are purposefully set in a stringent manner to protect children, elderly, and those with existing respiratory problems. Thus, the project would not result in air quality health impacts.

- e) ***Less than Significant Impact.*** According to the BAAQMD, land uses associated with odor complaints typically include wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. The project does not include any uses identified by the BAAQMD as being a substantial generator of odors.

Construction activity associated with the project may generate detectable odors from heavy-duty equipment exhaust and asphalt off-gassing. These construction-related odors would be short term in nature and cease upon project completion. Any impacts to existing adjacent land uses would be short term, as previously noted, and are considered less than significant given the project size. Therefore, impacts related to odor would be less than significant.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.4 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 US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following discussion on Biological Resources is based, in part, on the *Biological Resources Assessment* prepared by Ted Winfield and Associates, the *Redwood Market Arborist Report* prepared by MacNair and Associates, and the *Preliminary Advisory Assessment of Waters of the United States* prepared by Ted Winfield and Associates. These Reports can be found in Appendix B.

DISCUSSION OF IMPACTS

a,b,d) ***Less Than Significant Impact With Mitigation Incorporated.*** The project site and vicinity are generally developed with urban development that does not include habitat that supports special-status species. The site currently contains common introduced grasses, weeds,

volunteer ornamentals, and thickets of the aggressive (nonnative) Himalaya blackberry. There is no remaining native grassland or meadow vegetation, and the few remaining native species are represented by just a few scattered individuals (Patterson 2015). However, the undeveloped portion of the site was found to contain two seasonal wetlands covering 0.073 acres and a drainage ditch that is approximately 0.015 acres. Because of the developed nature of the project site, the number of wildlife species that would potentially be on-site is limited. Common species such as western gray squirrel (*Sciurus griseus*), raccoon (*Procyon lotor*), and opossum (*Didelphis virginiana*) have the potential to forage on the project site. The buildings provide suitable roosting habitat for a variety of bat species, such as the pallid bat (*Antrozous pallidus*) and Yuma myotis (*Myotis yumanensis*). The project site also contains suitable nesting habitat for a variety of common bird species including black phoebe (*Sayornis nigricans*), mourning dove (*Zenaida macroura*), rock dove (*Columba livia*), house finch (*Haemorhous mexicanus*), and a variety of birds protected under the Migratory Bird Treaty Act (MBTA), as well as moderately suitable habitat for Cooper's hawk (*Accipiter cooperii*), white-tailed kite (*Elanus leucurus*), and other raptors. No other wildlife is expected to occur on the project site or vicinity.

A total of 45 trees are proposed for removal to accommodate the project, and project demolition and construction could occur during the nesting bird season. In addition, bat roosts could be present in buildings proposed for demolition. As such, the project would have a potentially significant impact on sensitive species. Implementation of mitigation measures **MM 4.1** through **MM 4.4** would ensure that no nests or bat roosts are present in nearby trees or buildings when tree removal or building demolition occurs. As such, less than significant impacts would result.

- c) ***Less Than Significant Impact With Mitigation Incorporated.*** As noted above, the undeveloped portion of the site was found to contain two seasonal wetlands covering 0.073 acres and a drainage ditch that is approximately 0.015 acres. The project is anticipated to result in permanent impacts to these potentially jurisdictional waters. However, implementation of mitigation measure **MM 4.5** would ensure no net loss of wetlands through avoidance, impact minimization, and/or compensatory mitigation. Thus, the impact would be reduced to less than significant.
- e) ***Less Than Significant Impact With Mitigation Incorporated.*** As noted above, a total of 45 trees are proposed for removal to accommodate the project, 17 of which have protected tree status. The project would be required to comply with the Town of Windsor Municipal Code Chapter 27.36, Tree Preservation and Protection, which requires mitigation in the form of in-kind replacement, in-lieu replacement, and/or a combination of both. Compliance with Chapter 27.36 would ensure a less than significant impact due to tree removal. In addition, there are 4 protected trees identified to be preserved. If these trees are not protected, they could be damaged by construction activities. Mitigation measure **MM 4.6** would protect the retained trees from damage during construction, which would ensure a less than significant impact.
- f) ***No Impact.*** The project site is located within the boundaries of the US Fish and Wildlife Service's Santa Rosa Plain Conservation Strategy (SRPCS), a conservation program put in place to mitigate adverse effects on listed species from development on the Santa Rosa Plain. The program is intended to contribute to the recovery of the Sonoma County distinct

4.0 ENVIRONMENTAL CHECKLIST

population segment of California tiger salamander, Burke's goldfield, Sonoma sunshine, Sebastopol meadow foam, and the many-flowered navarretia and the conservation of their sensitive habitats. The project site is shown on the SRPCS as "Already Developed" with no potential for impact. Therefore, the project would not conflict with a habitat conservation plan and there would be no impact.

Mitigation Measures

- MM 4.1** The project applicant shall implement a Worker Environmental Awareness Program (WEAP) to educate construction workers about the presence of special-status species and/or sensitive biological resources in and/or near the project work area and to instruct workers on proper avoidance.

Timing/Implementation: Prior to start of construction

Enforcement/Monitoring: Town of Windsor Planning Division

- MM 4.2** If clearing and/or construction activities would occur during the raptor nesting season (February 1–September 15), preconstruction surveys to identify active nests shall be conducted by a qualified biologist within 14 days of construction initiation. Surveys must be performed by a qualified biologist for the purposes of determining presence/absence of active nest sites within the proposed impact area, including construction access routes and a 200-foot buffer (if feasible). If no active nests are found, no further mitigation is required. Surveys shall be repeated if construction activities are delayed or postponed for more than 30 days.

If raptor nests are identified within 500 feet of project activities, a 250-foot setback shall be imposed to all active raptor sites prior to the commencement of project construction activities to avoid construction- or access-related disturbances to nesting raptors. Project-related activities (i.e., vegetation removal, earth moving, and construction) shall not occur within any setbacks until nests are deemed inactive.

If migratory bird nests are identified within 200 feet of project activities, a 150-foot setback shall be imposed on all active migratory bird nest sites prior to the commencement of project construction activities to avoid construction- or access-related disturbances to nesting birds. Project-related activities (i.e., vegetation removal, earth moving, and construction) shall not occur within any setbacks until nests are deemed inactive.

Timing/Implementation: Prior to start of construction

Enforcement/Monitoring: Town of Windsor Planning Division

- MM 4.3** Removal of trees within the project footprint and adjacent areas that could support migratory bird and/or raptor nests and require setbacks that could affect the construction schedule shall be conducted during the non-breeding season (September 16–January 31) and prior to construction. Any tree pruning or

trimming required as a result of project-related activities shall be carried out under the supervision of a certified arborist to ensure the continued health of the tree.

Timing/Implementation: *Prior to start of construction*

Enforcement/Monitoring: *Town of Windsor Planning Division*

MM 4.4

Prior to demolition of structures on the project site, a qualified wildlife biologist shall conduct preconstruction surveys. If bats are identified as present on the site, bats shall be absent or humanely evicted and excluded from roost locations prior to demolition of buildings to avoid direct impacts. During the eviction process, potential roosts will be inspected and then sealed with exclusion devices to exclude bats. If bat eviction from buildings is necessary, it shall be done by a qualified biologist during the non-breeding season from October 1 to March 31. When flushing bats, structures shall be moved carefully to avoid harming individuals, and torpid bats given time to completely arouse and fly away.

Timing/Implementation: *Prior to demolition of structures*

Enforcement/Monitoring: *Town of Windsor Planning Division*

MM 4.5

The project applicant shall ensure that the project would result in no net loss of federally protected waters through impact avoidance, impact minimization, and/or compensatory mitigation, as determined in Clean Water Act Section 404 and 401 permits and/or a 1602 Streambed Alteration Agreement. Evidence of compliance with this mitigation measure shall be provided prior to construction and grading activities for each proposed project.

Timing/Implementation: *Prior to approval of improvement plans*

Enforcement/Monitoring: *Town of Windsor Planning Division*

MM 4.6

The following tree protection measures shall be noted on construction documents (or attached to them) and implemented to protect the oak trees on the project site in compliance with the Town of Windsor Tree Preservation and Protection Ordinance. These protection measures apply to the installation of improvements.

1. Trees adjacent to any development shall be fenced using an orange barrier fence, which shall extend to the full canopy cover of the tree. The fencing shall be a minimum of 4 feet high at all locations.
2. Fences erected to define tree protection zones shall not be removed until all site work has been completed. Fences may not be relocated or removed without written permission from the Town of Windsor or the project arborist.
3. Construction trailers, trucks, equipment, and storage areas must remain outside of protection zones at all times.

4.0 ENVIRONMENTAL CHECKLIST

4. All new underground utilities, drains, and irrigation lines shall be routed outside of tree protection zones. If lines must traverse a tree protection zone, they shall be tunneled or bored under the tree.
5. No materials, spoils, waste, or washout water may be deposited, stored, or parked within a tree protection zone.
6. Any herbicides placed under paving materials must be safe for use around trees and labeled for that use.
7. Any grading, construction, demolition, or other work expected to encounter tree roots must be monitored by the project arborist.
8. If necessary, erosion control devices such as silt fencing or debris basins shall be installed to prevent siltation or water diversion within the tree protection zone.
9. Before grading, pad preparation, or excavation for foundations, footings, walls, or trenching, trees shall be root pruned 1 foot outside the tree protection zone by cutting all roots cleanly to the indicated depth. Roots shall be cut by exposing with an air spade (or manually digging a trench) and cutting exposed roots with a saw, rock saw, narrow trencher with sharp blades, or carbide-tipped chain saw.
10. Any roots damaged during grading or construction shall be exposed to sound tissue and cut cleanly with a saw.
11. Spoils from trenches and other excavations shall not be placed within the tree protection zone, either temporarily or permanently.
12. No burn piles, trash, or debris shall be located within tree protection zones.
13. No smoking or heat sources shall be located near mulch of trees.
14. Fill soil adjacent to existing trees must be of similar texture (percentage of sand, silt, and clay) to native soils.

Timing/Implementation: *Prior to construction or demolition activity*

Enforcement/Monitoring: *Town of Windsor Planning Division*

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.5 CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resources or site or unique geologic feature.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following discussion of Cultural Resources is based, in part, on the *Historical Resources Survey* conducted by Tom Origer and Associates, which can be found in Appendix C.

DISCUSSION OF IMPACTS

The *Historic Resources Study for the Chevron Remodel Project and 9120 and 9200 Old Redwood Highway, Windsor, Sonoma County, California* (Tom Origer & Associates 2017), summarizes the methods and results of cultural resources identification methods including a Native American Heritage Commission Sacred Lands File request, project notification letters, Northwest Information Center records search (NWIC File No. 17-1184), historic map review, ethnographic literature review, and archaeological field survey.

Some fragments of obsidian pieces were found at the northern edge of the graveled area at the eastern-most edge of the study area. These specimens all appeared to be from the same flake (Franz Valley source) as they all had similar visual characteristics. No other obsidian specimens were observed throughout the remainder of the study area. These flakes do not constitute an archaeological site.

The building was evaluated in accordance with Section 15064.5(a)(2)–(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Resources Code, and it does not appear to be a historical resource for the purposes of CEQA. The station was recommended ineligible for inclusion in the California Register for lack of association with a historic context.

The Town lies within the Windsor basin, a major sub-basin of the Santa Rosa Plain. The Windsor basin is underlain by Miocene to Recent, mostly terrestrial sediments, representing approximately the last 5 million years of geologic time. The majority of surficial sediments in the Town consist of Pleistocene to recent alluvium and alluvial fan deposits, including the project site. The General Plan EIR identifies alluvial deposits within the project site as having low sensitivity for paleontological resources. These deposits have not yielded fossils in the past but remain potentially fossiliferous.

4.0 ENVIRONMENTAL CHECKLIST

General Plan Policy CR-2 requires a paleontological assessment for development projects in high sensitivity geologic units, but no such study is required for projects in low sensitivity units.

DISCUSSION OF IMPACTS

- a) ***No Impact.*** As discussed above, no historical resources were identified in the project area as part of the Tom Origer & Associates study. Further, the Chevron Station was evaluated and recommended ineligible for listing in the California Register and is not a historical resource for the purposes of CEQA. Because no historical resources will be directly or indirectly impacted by the project, no impact would occur.
- b) ***Less Than Significant Impact With Mitigation Incorporated.*** The project site has been heavily disturbed through its development and use as a gas station since 1968 and does not contain any known archaeological resources. However, there is the potential to discover previously unknown archaeological resources during earth-moving construction activities. Implementation of mitigation measure **MM 5.1** would reduce this potentially significant impact to a less than significant level by ensuring proper treatment of any such resources discovered on the site during project implementation.
- c) ***Less Than Significant Impact With Mitigation Incorporated.*** According to the Town of Windsor General Plan EIR, the project site contains relatively recent alluvial deposits, which are geologic sediments with low sensitivity for paleontological resources. However, these sediments with low sensitivity may still contain fossils. With the implementation of mitigation measure **MM 5.2**, potential significant impacts would be mitigated to a less than significant level by ensuring proper treatment of any paleontological resources discovered on the site during project implementation.
- d) ***Less Than Significant Impact With Mitigation Incorporated.*** As discussed previously, the site has been heavily disturbed and does not contain any known cemeteries or burial sites. However, there is the potential to discover previously unknown remains during earthmoving construction activities. Implementation of mitigation measure **MM 5.3** would reduce this potentially significant impact to a less than significant level by ensuring proper treatment of any human remains discovered on the site consistent with state law.

Mitigation Measures

- MM 5.1** **Treatment of previously unidentified archaeological cultural deposits.** The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of the action required in the event cultural resources are encountered during construction. 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 has evaluated the find. Potentially significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. The archaeologist shall make recommendations concerning appropriate measures that will be implemented to protect the resource, including but not limited to excavation and evaluation of the

finds in accordance with CEQA Guidelines Section 15064.5. 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 shall be submitted to the Town of Windsor, the Northwest Information Center, and the California Office of Historic Preservation, as required.

Timing/Implementation: *During construction activities*

Enforcement/Monitoring: *Town of Windsor*

MM 5.2 **Treatment of previously unidentified paleontological resources.** If paleontological resources are encountered during grading or construction activities related to the proposed project, all work in the area of the find shall cease. The contractor shall notify the Town, and a qualified paleontologist shall evaluate the find(s) and recommend appropriate next steps to ensure that the resource(s) is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. The qualified paleontologist shall make recommendations as to the paleontological resource's disposition to the Town.

Timing/Implementation: *During construction activities*

Enforcement/Monitoring: *Town of Windsor*

MM 5.3 **Treatment of previously unidentified human remains.** The Town and/or contractor shall treat any human remains or Tribal Cultural Resources encountered during ground-disturbing activities in accordance with California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Sonoma County coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. At the same time, an archaeologist shall be contacted to assess the situation and consult with agencies, as appropriate. Project personnel/construction workers shall not collect or move any human remains or associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Native American most likely descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

Timing/Implementation: *During construction activities*

Enforcement/Monitoring: *Town of Windsor*

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.6 ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***Less Than Significant Impact.*** The proposed project would utilize energy resources during construction and operation. Energy resources that would be potentially utilized include electricity and petroleum-based fuels and related distribution systems. The following paragraphs discuss energy consumption associated with short-term project construction and long-term project operation.

Construction Energy Use

Construction of the proposed project would involve on-site energy demand and consumption related to the use of oil in the form of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. In addition, diesel-fueled portable generators may be necessary to provide additional electricity demands for temporary on-site lighting, welding, and for supplying energy to areas of the sites where energy supply cannot be met via a hookup to the existing electricity grid. Project construction would not involve the use of natural gas appliances or equipment.

Even during the most intense period of construction, due to the different types of construction activities (e.g., site preparation, grading, building construction), only portions of the project site would be disturbed at a time, with operation of construction equipment occurring at different locations on the project site, rather than a single location. All construction equipment and operation thereof would be regulated per the CARB In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. The project would also be subject to mandates on portable diesel generators and the EPA's strict on-road emissions standards for heavy-duty engines. Compliance with the In-Use Off-Road Diesel Vehicle Regulation and EPA regulations would ensure the off-road equipment used during project construction activities would not result in an inefficient or wasteful use of energy or excessive fuel consumption. In addition, technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to reduce demand on oil and emissions associated with construction in California over the next few years. As such, temporary energy use during construction of the proposed project would

not result in a significant increase in peak or base demands or require additional capacity from local or regional energy supplies and would not result in wasteful, inefficient or unnecessary consumption of energy during project construction.

Operational Energy Use

Following completion of the project construction, Pacific Gas & Electric (PG&E) would provide electricity and natural gas to the project site. Energy use associated with operation of the proposed project would be typical of commercial uses. The project does not include any unusual project characteristics or require special equipment that would be more energy intensive than typical uses. The project would include appliances, fixtures, and landscaping in compliance with the most current Title 24 energy efficiency standards. Maintenance activities during operations, such as landscape maintenance, would involve the use of electric or gas-powered equipment. In addition to on-site energy use, the proposed project would result in transportation energy use associated with vehicle trips generated by the proposed commercial development. With respect to transportation energy use, the proposed project would not have control over fuel consumption factors such as vehicle type(s), engine efficiency, vehicle miles traveled, etc. for customers and employees. However, due to CARB's increasing vehicle efficiency standards, it is assumed the long-term transportation fuel consumption from patrons would steadily decline over time and ensure that vehicle fuel consumption is not wasteful or inefficient.

The proposed project would be subject to all relevant provisions of the most recent update of the California Building Energy Efficiency Standards (Title 24) and CALGreen Code. Compliance with the Title 24 and the CALGreen Code would ensure that the building energy use associated with the proposed project would not be wasteful, inefficient, or unnecessary.

Based on the above discussions regarding construction and operational energy use, the project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. This impact would be less than significant.

- b) ***Less Than Significant Impact.*** State and local agencies regulate the use and consumption of energy through various methods and programs. As a result of the passage of Assembly Bill 32 (AB 32) (the California Global Warming Solutions Act of 2006), which seeks to reduce the effects of GHG emissions, a majority of the state regulations are intended to reduce energy use and GHG emissions. These include, among others, California Code of Regulations Title 24, Part 6—Energy Efficiency Standards, and the California Code of Regulations Title 24, Part 11—CALGreen. At the local level, the Town's Building Division enforces the applicable requirements of the Title 24 and CALGreen Code. The Town is currently in the process of developing a Climate Change Resilience Plan, while the County of Sonoma has a Regional Climate Action Plan that was adopted in 2016. Further, as described in **Table 4.8-3**, the proposed project is consistent with the energy related goals and policies of the Town of Windsor General Plan. As such, this impact would be less than significant.

**Table 4.8-3
Project Consistency with General Plan**

General Plan Goal	Policies	Project Consistency
Goal ER-5: Improve the sustainability and resilience of Windsor through compliance with local, State, and Federal policies and standards that aim to reduce greenhouse gas emissions in the community.	ER-5.8: The Town shall promote energy conservation/energy efficiency improvement programs for residential and commercial properties such as those offered by Sonoma County Energy Independence Program (SCEIP) and Property Assessed Clean Energy (PACE), that reduce energy demand which contribute to background levels of regional air emissions and GHG emissions.	The project would comply with the latest California Building Energy Efficiency Standards (Title 24) requirements, which would promote energy conservation and energy efficiency improvements that are greater than what is currently on-site. Therefore, the project would help reduce both energy demand and regional air and GHG emissions and would be consistent with ER-5.8.
	ER-5.10: The Town shall require new construction to meet targeted energy performance standards to advance Town greenhouse gas reduction and other sustainability goals and policies identified in the General Plan. The Town will allow new development to select from a range of options to achieve a minimum energy performance standard, including but not limited to: <ul style="list-style-type: none"> • solar easements to guarantee access to increased renewable • energy generation; • installation of EV charging stations in homes and in • commercial development to increase the ability for the • public to use zero-emission vehicles; • passive heating and cooling building design; • solar roof and carport panels; • cool roofs; • Smart appliances; • wind generation; • installation of energy efficient appliances and fixtures; and • other emerging technologies as they become available. The Town shall work with affordable housing developers to assist in meeting the energy performance standards.	The project would comply with the latest State and local energy efficiency requirements, such as any targeted energy performance standards established by the Town of Windsor. Therefore, the project would be consistent with ER-5.10.
	ER-5.14: The Town shall continue to enforce State energy regulations governing energy consumption and use of solar and other renewable energy resources in existing and new development.	The project would comply with the latest California Building Energy Efficiency Standards (Title 24) and California Green Building Standards Code (CALGreen) requirements, which would promote energy conservation and energy efficiency improvements that are greater than what is currently on-site as well as water-conserving plumbing fixtures/fittings. It would also require recycling and/or salvage for reuse of a minimum of 65% of the nonhazardous

		construction and demolition waste. Thus, the project would be consistent with ER-5.14.

Mitigation Measures

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.7 GEOLOGY AND SOILS. Would the project:				
a) Expose people or structures to 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

a)

i-iii) Less Than Significant Impact. According to the Alquist-Priolo Earthquake Fault Zoning maps prepared by the California Department of Conservation, the project site is not within an earthquake fault zone. The closest faults to the project site are the Healdsburg and Rodgers Creek Faults, located approximately 2 miles east (California Department of Conservation 2018). The site is subject to intense seismic ground shaking in the event of an earthquake within the region (Branum et al. 2016). Project site soils have not been studied for the potential for soil liquefaction. However, all new construction would be subject to the California Building Code (CBC) seismic design force standards and Title VII, Chapter 2 of the Town's Municipal

Code is based on the 2016 CBC. Compliance with these standards is required and would ensure that the structures and associated improvements are designed and constructed to withstand expected seismic activity and associated potential hazards, including strong seismic ground shaking and seismic-induced ground failure (i.e., liquefaction, lateral spreading, landslide, subsidence, and collapse), thereby minimizing risk to the public and property. This impact would be less than significant.

- iv) **No Impact.*** Potential for landslide at the project site is minimal because the topography of the site and the surrounding land is entirely flat. There would be no impact.

- b) **Less Than Significant Impact.*** The proposed project would include land clearing, excavating, and other soil-disturbing activities which would expose site soils to wind and water erosion. All construction activities would be subject to the Town of Windsor Municipal Code (Title IX, Chapter 4), which contains restrictions and best management practices (BMP) to reduce and/or prevent soil erosion. Furthermore, for construction sites that disturb more than 1 acre, a developer must prepare a stormwater pollution prevention plan (SWPPP) in accordance with the requirements of the Construction General Permit. The SWPPP must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Compliance with these existing regulatory requirements would minimize the potential for soil erosion during project construction and operation. The project would have a less than significant impact.

- c) **Less Than Significant Impact.*** See Issue a)(i-iii). Compliance with existing regulations would minimize risk related to potentially unstable soils and/or geologic units at the site. This impact would be less than significant.

- d) **Less Than Significant Impact.*** See Issue a)(i-iii). Compliance with existing regulations would minimize risk associated with potentially expansive soils at the project site. The impact would be less than significant.

- e) **No Impact.*** The project site is currently served by a public sewer system. The project does not propose the use of any septic systems or other alternative wastewater disposal systems. There would be no impact.

Mitigation Measures

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.8 GREENHOUSE GASES. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***Less Than Significant Impact.*** The BAAQMD's approach to developing a threshold of significance for greenhouse gas (GHG) emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move the state toward climate stabilization. If a project generated GHG emissions above the threshold level, it would be considered to contribute considerably to a significant cumulative impact. Stationary-source projects include land uses that would accommodate processes and equipment that emit GHG emissions and would require an air district permit to operate. If annual emissions of operational-related GHGs exceed these levels, the proposed project would result in a cumulatively considerable contribution to a cumulatively significant impact to global climate change.

Table 4.8-1 presents the project-level thresholds for GHG emissions. It should be noted that the BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, the BAAQMD recommends quantification and disclosure of construction GHG emissions. The BAAQMD also recommends that the lead agency make a determination on the significance of these construction-generated GHG emission impacts in relation to meeting Assembly Bill (AB) 32 GHG reduction goals, as required by Public Resources Code Section 21082.2. The lead agency is encouraged to incorporate BMPs to reduce GHG emissions during construction, as feasible and applicable.

**Table 4.8-1
BAAQMD GHG Thresholds**

Project Type	Construction-Related	Operation-Related
Projects other than Stationary Sources ¹	None	Compliance with Qualified Climate Action Plan OR 1,100 MTCO ₂ eq/yr. OR 4.6 MTCO ₂ eq/SP/yr. ²

Stationary Sources ¹	None	10,000 MTCO ₂ eq/yr.
MTCO ₂ eq/year = metric tons of carbon dioxide equivalent per year		
Notes:		
1. According to the BAAQMD CEQA Guidelines, a stationary source project is one that includes land uses that would accommodate processes and equipment that emit GHG emissions and would require a BAAQMD permit to operate. Projects other than stationary sources are land use development projects including residential, commercial, industrial, and public uses that do not require a BAAQMD permit to operate.		
2. SP = service population (residents + employees).		
Source: BAAQMD 2009, 2017a.		

The proposed project would result in direct and indirect emissions of CO₂, N₂O, and CH₄, but would not result in other GHG emissions that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG estimations are based on energy emissions from natural gas usage and automobile emissions. CalEEMod version 2016.3.2 relies upon trip data from the traffic study prepared by W-Trans (2018) and project-specific land use data to calculate emissions. The project scenario evaluated in the emissions model represents a land use of greater intensity than the proposed project. Therefore, Table 4.8-2, *Estimated Greenhouse Gas Emissions*, presents a conservative estimate of the proposed project's CO₂, N₂O, and CH₄ emissions, including construction emissions amortized over a 30-year period. CalEEMod outputs are contained within Appendix A, *Air Quality and Green House Gas Emissions Data*. It is noted that the GHG emissions shown in Table 4.8-2 reflect energy-related project design features that were input into CalEEMod.

Direct Project-Related Source of Greenhouse Gases

Construction Emissions. The BAAQMD has not adopted thresholds for GHGs associated with construction activities. Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions. As shown in Table 4.8-2, the proposed project would result in 86.4 MTCO₂eq/year (amortized over 30 years), which represents a total of approximately 2.88 MTCO₂eq from construction activities.

Mobile Source Emissions. CalEEMod relies on trip data in the traffic study and project-specific land use data to calculate mobile source emissions. The proposed project would result in an average of 1,540 net new daily vehicle trips daily trips, which, as shown in Table 4.8-2, equates to approximately 417 MTCO₂eq/year of mobile source-generated GHG emissions.

Indirect Project-Related Source of Greenhouse Gases

Energy Consumption. Energy consumption emissions were calculated using the CalEEMod model and project-specific land use data. Electricity would be provided to the project site via PG&E. As shown in Table 4.8-2, the project would indirectly result in 30.75 MTCO₂eq/year of GHG emissions due to energy consumption. It should be noted that the proposed project would include new buildings that would be more energy efficient than the existing buildings on site.

4.0 ENVIRONMENTAL CHECKLIST

Water Demand. The proposed project's operations would result in a demand of approximately 1.24 million gallons of water per year. As shown in Table 4.8-2, indirect emissions from energy usage due to water supply would result in 1.75 MTCO₂eq/year.

Solid Waste. As shown in Table 4.8-2, solid waste associated with operations of the proposed project would result in 17.70 MTCO₂eq/year.

**Table 4.8-2
Estimated Greenhouse Gas Emissions**

Source	CO ₂	CH ₄		N ₂ O		Total Metric Tons of CO ₂ eq ³
	Metric Tons/year ¹	Metric Tons/year ¹	Metric Tons of CO ₂ eq ²	Metric Tons/year ¹	Metric Tons of CO ₂ eq ²	
Direct Emissions						
• Construction (amortized over 30 years)	2.86	0.00	0.02	0.00	0.00	2.88
• Mobile Source	416.35	0.03	0.65	0.00	0.00	417.00
Total Direct Emissions ³	419.21	0.03	0.67	0.00	0.00	419.88
Indirect Emissions						
• Energy	30.37	0.00	0.38	0.00	0.28	30.75
• Solid Waste	7.15	0.42	10.55	0.00	0.00	17.70
• Water Demand	0.72	0.03	1.03	0.00	0.23	1.75
Total Indirect Emissions ³	38.24	0.45	11.96	0.00	0.51	50.2
Total Project-Related Emissions ³	470.08 MTCO ₂ eq/year					
BAAQMD Threshold of Significance	1,100 MTCO ₂ eq per SP per year					
Project Exceed Thresholds?	No					
Notes:						
1. Emissions calculated using CalEEMod 2016.3.2.						
2. Carbon dioxide equivalent values calculated using the U.S. EPA Website, <i>Greenhouse Gas Equivalencies Calculator</i> , https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator , accessed June 2018.						
3. Totals may be slightly off due to rounding.						
Source: Refer to Appendix A, <i>Air Quality/Greenhouse Gas Analysis Data</i> , for assumptions used in this analysis.						

As shown in Table 4.8-2, the combined project-related GHG emissions from direct and indirect sources would total 470.08 MTCO₂eq/year, which is below the BAAQMD significance threshold (1,100 MTCO₂eq/year). Therefore, the project's contribution of GHG emissions would be less than significant.

- b) ***Less than Significant.*** The Town of Windsor's *2040 General Plan* (2018) contains GHG reduction targets consistent with Senate Bill (SB) 32 and the CARB Scoping Plan. As shown in Table 4.8-3, *Project Consistency with General Plan*, the project would comply with the applicable goals and policies listed in the General Plan. In addition, as shown in Table 4.8-2, the project would not exceed the BAAQMD GHG screening threshold of 1,100 MTCO₂eq/yr. Therefore, the project would not conflict with or impede implementation of reduction goals identified in the General Plan, the Scoping Plan, or other federal, state, and regional strategies to help reduce GHG emissions. As such, impacts would be less than significant in this regard.

**Table 4.8-3
Project Consistency with General Plan**

General Plan Goal	Policies	Project Consistency
Goal ER-5: Improve the sustainability and resilience of Windsor through compliance with local, State, and Federal policies and standards that aim to reduce greenhouse gas emissions in the community.	ER-5.5: The Town shall continue to assess and monitor performance of greenhouse gas emissions (GHG) reduction efforts beyond the AB 32 designated 2020 goal, including progress towards meeting long-term GHG emissions reduction goals for 2030 (consistent with SB 32) and 2050, as well as the effects of climate change and associated levels of risk, in order to plan a community that is resilient and can adapt to changing climate conditions and its negative impacts.	The BAAQMD GHG threshold of 1,100 MTCO ₂ eq/year was adopted to correlate emission impacts in relation to meeting the AB 32 GHG reduction goals, as required by Public Resources Code Section 21082.2. As the project would not exceed the BAAQMD threshold of 1,100 MTCO ₂ eq/year and would not have a significant impact in this regard, the project would not impede the goals of AB 32 and would be consistent with ER-5.5.
	ER-5.8: The Town shall promote energy conservation/energy efficiency improvement programs for residential and commercial properties such as those offered by Sonoma County Energy Independence Program (SCEIP) and Property Assessed Clean Energy (PACE), that reduce energy demand which contribute to background levels of regional air emissions and GHG emissions.	The project would comply with the latest California Building Energy Efficiency Standards (Title 24) requirements, which would promote energy conservation and energy efficiency improvements that are greater than what is currently on-site. Therefore, the project would help reduce both energy demand and regional air and GHG emissions and would be consistent with ER-5.8.
	ER-5.12: The Town shall actively encourage the retrofitting of existing buildings throughout Windsor in order to align those buildings more closely with the Town's energy performance standards.	The project would comply with California Green Building Standards Code (CALGreen) and would use water-conserving plumbing fixtures/fittings and outdoor potable water use in landscape areas, and would recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste. Thus, the project would be consistent with ER-5.12.
Source: Windsor 2018.		

Mitigation Measures

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.9 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

a) ***Less Than Significant Impact.***

The State Water Resources Control Board GeoTracker website identifies Leaking Underground Storage Tanks (LUST) cleanup sites, Cleanup Program Sites, military sites, land disposal sites (landfills), permitted underground storage tank sites, Waste Discharge Requirement sites, and Irrigated Lands Regulatory Program sites. A search of the GeoTracker

database (SWRCB 2018) identifies the project site, 9120 Old Redwood Highway, as an active LUST site (Site ID T0609700340) requiring verification monitoring. The SWRCB summary report of the site identifies that underground storage tank (UST) removal and replacement occurred in 1991 and 1995. Approximately 4,000 cubic yards of impacted soil were excavated and disposed of in 1995, and approximately 250,000 gallons of groundwater and stormwater runoff were pumped from the excavation. A remediation system began on October 7, 2008, and consists of soil vapor extraction, air sparge, and a groundwater treatment system (DTSC 2018).

The proposed project would be a continuation of the current use of the site as a gas station. While the project would include two additional pumps, no new underground storage tanks would be added, so operation of this portion of the project would be similar to existing site conditions. The commercial buildings and restaurant would not use, store, or transport substantial amounts of hazardous waste materials.

Compliance with existing applicable regulations and 2040 General Plan Public Health and Safety Element Policies PHS-5.1 through 5.15 would ensure that risks from routine use, transport, handling, storage, disposal, and release of hazardous materials would be minimized. Oversight by the appropriate federal, state, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Therefore, impacts from a hazard to the public or the environment through routine transport, use, or disposal of hazardous materials would be less than significant.

- b) ***Less Than Significant Impact With Mitigation Incorporated.*** The project proposes to demolish the existing buildings that were constructed in 1968. Due to the age of these structures, there is potential for the presence of hazardous building materials, such as asbestos and lead-based paint, that could result in exposure to workers during demolition activities. Implementation of mitigation measure **MM 9.1** would reduce this impact to a less than significant level by requiring preconstruction testing for asbestos-containing building materials and lead-based paint and, if found, proper removal of such materials by a qualified professional.
- c) ***Less Than Significant Impact.*** See Issue a). There are two schools within approximately one-quarter mile of the project site: The Bridges Community Based School, North County Consortium and Insight School of California, North Bay. The project site is and will be a gas station that could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, but compliance with existing applicable regulations and 2040 General Plan Public Health and Safety Element Policies PHS-5.1 through 5.15 and oversight by appropriate federal, state and local agencies would minimize the risk of the public's potential exposure. This would be less than significant.
- d) ***Less Than Significant Impact.*** See Issue a). According to the SWRCB and California Department of Toxic Substances Control (DTSC), the project site is an active LUST site that underwent remediation in 2008. Continued compliance with 2040 General Plan Public Health and Safety Element Policies PHS-5.1 through 5.15 and applicable state and federal policies would ensure public safety from hazardous materials. There would be a less than significant impact.

4.0 ENVIRONMENTAL CHECKLIST

- e) **No Impact.** The project site is not located within 2 miles of any public use airports and would not result in any safety hazards related to aircraft operation. There would be no impact.
- f) **No Impact.** The project site is not located within 2 miles of a private airstrip and would not result in any safety hazards related to aircraft operation. There would be no impact.
- g) **Less Than Significant Impact.** Project improvements would be limited to the project site and would not affect adjacent roadway operations or accessibility. The project site is located in the vicinity of major roadways that could serve as evacuation routes. However, should construction activities or traffic require temporary lane closures or detours, the applicant would coordinate with the Windsor Public Works Department to ensure traffic operations are not adversely affected. This impact would be less than significant.
- h) **No Impact.** The project site is located in an urbanized area and is protected by the Windsor Fire Protection District. There is no risk of wildland fire, and no impact has been identified.

Mitigation Measures

MM 9.1 Prior to demolition activities, a hazardous building materials survey shall be conducted by a qualified and licensed professional for all structures proposed for demolition or renovation that have not previously been inspected or abated. All loose and peeling lead-based paint and asbestos-containing material shall be abated by certified contractor(s) in accordance with local, state, and federal requirements. All other hazardous material shall be removed from buildings prior to demolition in accordance with California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) regulations. The completion of the abatement activities shall be documented by a qualified environmental professional and submitted to the Town for review prior to initiating demolition.

Timing/Implementation: Prior to demolition activities

Enforcement/Monitoring: Town of Windsor

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.10 HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of a failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***Less Than Significant Impact.*** Windsor is in the Russian River watershed, in the Mark West Creek subwatershed. Five major creeks flow through the town: Windsor Creek, East Windsor Creek, Pool Creek, Pruitt Creek, and Starr Creek. Several additional creeks flow close to the

town's edge: Gumview Creek, Sotoyome Creek, Redwood Creek, Ordinance Creek, and Airport Creek. The majority of the town's potable water supply is primarily from Windsor Water District wells in the Russian River Well Field, obtained under the Sonoma County Water Agency's (SCWA) diversion rights. The Town also owns five off-river wells. One active groundwater well exists to provide irrigation water for Esposti Park; the other four wells are currently inactive.

The SWRCB, and by extension the North Coast Regional Water Quality Control Board (RWQCB), regulate and protect waters in California and the region, respectively. These boards issue and enforce waste discharge permits, National Pollutant Discharge Elimination System (NPDES) permits, and Clean Water Act Section 401 quality permits. Pursuant to SWRCB Construction General Permit Order No. 99-08-DWQ, the Town is required to reduce or eliminate pollutant discharges into stormwater and non-stormwater runoff from construction sites.

Compliance with the Construction General Permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require development of a SWPPP, which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary. Compliance with the Construction General Permit is reinforced through the Town of Windsor Municipal Code, which requires the development of an erosion and sediment control plan that is equivalent to the required SWPPP.

Implementation of the proposed project could result in water quality degradation during construction and operation. Construction activities associated with the proposed project would include grading, excavation, and vegetation removal, which would disturb and expose soils to water erosion, potentially increasing the amount of silt and debris entering the public stormwater system and downstream waterways. In addition, refueling and parking of construction equipment and other vehicles on-site during construction could result in oil, grease, and other related pollutant leaks and spills that could enter runoff. However, the project applicant would be required to prepare and comply with a SWPPP that would include pollution prevention measures (erosion and sediment control measures and measures to control non-stormwater discharges and hazardous spills), demonstrate compliance with all applicable local and regional erosion and sediment control standards, identify responsible parties, and include a detailed construction timeline. The SWPPP must also include BMPs to reduce construction effects on receiving water quality by implementing erosion control measures and reducing or eliminating non-stormwater discharges.

Examples of typical construction BMPs include using temporary mulching, seeding, or other suitable stabilization measures to protect uncovered soils; storing materials and equipment to ensure that spills or leaks cannot enter the storm drain system or surface water; developing and implementing a spill prevention and cleanup plan; and installing sediment control devices such as gravel bags, inlet filters, fiber rolls, or silt fences to reduce or eliminate sediment and other pollutants from discharging to the drainage system or receiving waters. SWPPP BMPs

are recognized as effective methods to prevent or minimize the potential releases of pollutants into drainages, surface water, or groundwater. Strict SWPPP compliance, coupled with the use of appropriate BMPs, would reduce potential water quality impacts during construction activities.

Compliance with the existing regulatory environment described above would ensure that the project complies with all applicable water quality standards and waste discharge requirements. The project's impact would be less than significant.

- b) ***Less Than Significant Impact.*** The project would connect to the Town's water system, which does not rely on local wells. The Town's potable water supply is provided primarily from Windsor Water District wells in the Russian River Well Field, obtained under the SCWA's diversion rights. Groundwater extraction from the Russian River alluvial aquifer would be subject to the conditions of the SCWA water rights agreement. Future extractions from the aquifer would be managed in accordance with SWRCB regulations. For these reasons, the General Plan EIR determined that projected growth under the 2040 General Plan would not result in a depletion of groundwater supplies in the Santa Rosa Plain Subbasin. The proposed project is consistent with the General Plan; therefore, the groundwater demand associated with the proposed project would not exceed the assumptions in the General Plan EIR. The impact due to groundwater extraction would be less than significant.

Because the project would create more than 10,000 square feet of new impervious surfaces, it is subject to Sonoma County's Standard Urban Stormwater Mitigation Plan (SUSMP) regulations and low-impact development (LID) requirements. This increase in impermeable surfaces could potentially interfere with groundwater recharge; however, the project will be designed to (1) incorporate roof drainage, valley gutter, and sump pump, which collects and treats stormwater on site; and (2) provides infiltration off site with two new bioswales at the Public Works facility parking lot (8400 Windsor Road). Curb cuts would be added to direct approximately 26,000 square feet of parking and drive aisle surfaces into the bioswales. This would allow for groundwater recharge.

The project site is located within the jurisdiction of the Santa Rosa Plain Groundwater Sustainability Agency (SRPGSA) which is in the process of creating a Groundwater Sustainability Plan. Previously, an advisory panel created a Groundwater Management Plan in 2014 for the Santa Rosa Plain. As established in the Draft Sustainability Plan for SRPGSA, recharge in the Santa Rosa Plain is accomplished primarily through direct infiltration of precipitation and infiltration from streams. The project's implementation of bioswales offsite, described above, would ensure the project does not impede recharge. The site is not part of any groundwater recharge or management efforts implemented by the SRPGSA or under the previous Groundwater Management Plan. Because the project would not obtain water from groundwater supplies in the Santa Rosa Plain, incorporates a stormwater drainage system, is consistent with the Town of Windsor General Plan, and does not impede a Groundwater Sustainability Plan or Groundwater Management Plan, impacts would be less than significant.

- c) ***Less Than Significant Impact.*** There are no streams or rivers near the site that would be subject to alteration due to the project. The proposed project would include construction of an on-site drainage system that would connect to the existing public stormwater drainage system. Because of the LID features required in the SUSMP, the project would not result in a

4.0 ENVIRONMENTAL CHECKLIST

substantial increase in surface runoff that would result in flooding on- or off-site. Additional runoff due to new impervious surfaces would be captured through roof gutters, valley gutters, and the sump pump. Furthermore, the project would be required to adhere to Town Ordinance No. 2016-303, which addresses regulations for erosion control measures, based on the California Building Code. The design features noted above will reduce impacts to a level that is less than significant.

- d) ***Less Than Significant Impact.*** See Issue c). The project would not alter the course of any streams or rivers. The project proposes to reconfigure the site, both removing and adding structures and hardscape areas. However, the project plans include adequate drainage and infiltration. This impact would be less than significant.
- e) ***Less Than Significant Impact.*** See Issue c). The proposed project would not substantially alter the existing drainage patterns on the site and would not exceed the capacity of the drainage system serving the site. Compliance with existing regulations related to water quality protection would reduce this impact to a level that is less than significant.
- f) ***Less Than Significant Impact.*** See Issue a). Compliance with existing regulations related to erosion and water quality protection would reduce this impact to a level that is less than significant.
- g) ***No Impact.*** According to the Federal Emergency Management Agency (FEMA 2014), the project site is mapped within Zone X (unshaded), which is an area of minimal flood hazard, outside the 0.2 and 0.1 percent chance of flooding. The project site is also not located within a flood hazard area identified in the Town's Zoning Map (Windsor 2018a) or Local Hazard Mitigation Plan (Michael Baker International 2017). The project does not propose constructing housing; therefore, the project would have no impact.
- h) ***No Impact.*** See Issue g). As noted above, the project site is located in Zone X, an area outside the 0.1 percent chance of flooding. Therefore, the proposed project would not place structures in a 100-year flood hazard area that could impede or redirect flood flows. There would be no impact.
- i) ***Less Than Significant Impact.*** See Issue g). The project site is within an area of minimal flood hazard. However, the project site is within the inundation area for the Warm Springs Dam in the event of a dam failure. The project site is also adjacent to, but outside, the inundation area for the Foothill Region Park and Lagunita 1427 Dams. Each of these facilities is routinely maintained and inspected, and the risk of failure is considered to be very low. The Warm Springs Dam was last evaluated in 2006 and rated IV on the US Army Corps of Engineers' Dam Safety Action Class system. A rating of IV is considered low urgency, meaning the dam may not meet all essential engineering guidelines, but the risk of failure and the consequences of failure are low. The other two dams were not evaluated under the Dam Safety Action Class, and the failure risk of these dams is unknown (Michael Baker International 2017). Because the failure risk of Warm Springs Dam is considered to be very low, this impact would be less than significant.

- j) ***No Impact.*** The project site is not located near the ocean or any large bodies of water capable of producing tsunami or seiche waves. The project site and surrounding area are relatively flat and not at risk of mudslide. There would be no impact.

Mitigation Measures

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.11 LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

- a) **No Impact.** The project site has been developed as a gas station since 1968. The proposed project would reconfigure the site, but it would not impede access to the site or adjacent properties or otherwise divide the surrounding community. There would be no impact.
- b) **No Impact.** The proposed project consists of improvements to an existing gas station site. These improvements would not change the current use of the site or otherwise conflict with any applicable land use plan, policy, or regulation. The proposed project is consistent with the General Plan designation and zoning for the site. There would be no impact.
- c) **No Impact.** The project site is located within the boundaries of the US Fish and Wildlife Service's Santa Rosa Plain Conservation Strategy (SRPCS), a conservation program put in place to mitigate adverse effects on listed species from development on the Santa Rosa Plain. The program is intended to contribute to the recovery of the Sonoma County distinct population segment of California tiger salamander, Burke's goldfield, Sonoma sunshine, Sebastopol meadow foam, and the many-flowered navarretia and the conservation of their sensitive habitats. The project site is shown on the SRPCS as "Already Developed" with no potential for impact. Therefore, the project would not conflict with a habitat conservation plan and there would be no impact.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.12 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***No Impact.*** The project site has been developed as a gas station since 1968 and is located in an urbanized area. There are no known mineral resources underlying the site or in the project vicinity. Therefore, the project would have no impact.
- b) ***No Impact.*** There are no mineral resource recovery sites or operations on or in the vicinity of the project site. There would be no impact.

Mitigation Measures

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.13 NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***Less Than Significant Impact.*** The predominant source of noise in the project vicinity is traffic noise from Old Redwood Highway; however, the existing car wash on the project site also contributes to the noise environment in the project area. Figure 16 in the General Plan Update 2040 Draft EIR shows existing noise levels. Much of the project site is exposed to noise levels of up to 70 decibels (dBA) Ldn (day-night average) generated by traffic on Old Redwood Highway.

The Municipal Code regulates noise from construction activities by limiting construction activities to the least intrusive periods. Municipal Code Section 7-1-190 allows construction, alteration, or repair activities which are authorized by a valid Town permit between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between the hours of 8:00 a.m. and 7:00 p.m. on Saturday. No construction, alteration, or repair activities are permitted on Sunday unless authorized by the Building Official.

The project proposes to reconfigure the site, both removing and adding building space. While the project would increase the number of fuel pumps on the project site from six to eight pumps, the car wash would be the project component that would generate the most noise. Because the site currently contains a car wash, oriented in the same way as the proposed car wash, there would not be a substantial change in the noise generated with the proposed project. Similarly, the increase of two fuel pumps would not substantially alter the noise generated on the site such that there would be a noticeable increase in noise. Thus, noise levels generated at the site are expected to remain the same as current conditions, and this impact would be less than significant.

- b) ***Less Than Significant Impact.*** The project does not include any components that would result in vibration during operation. However, vibration could occur during construction activities. The primary construction activities associated with the project would occur during demolition of existing structures and construction of the proposed buildings and associated infrastructure. A vibratory compactor is the only piece of equipment likely to be used during project construction that could exceed 0.1 inch per second peak particle velocity (ppv), which is the threshold for annoyance, and is well below the 1.0 inch per second ppv that is the threshold for structural damage (Caltrans 2002, 2004). These levels are based on a reference distance of 25 feet. All existing development surrounding the site is at sufficient distance so as to not be affected by any vibrations during construction. This impact would be less than significant.
- c) ***Less Than Significant Impact.*** See Issue a). Noise levels at the site are expected to remain the same as current conditions and the permanent ambient noise levels in the project vicinity would not substantially increase. This impact would be less than significant.
- d) ***Less Than Significant Impact With Mitigation Incorporated.*** Construction of the proposed project would temporarily increase noise levels on the project site. Activities involved in typical construction would generate maximum noise levels ranging from 85 to 95 dB at a distance of 50 feet. Noise would also be generated during the construction phase by increased truck traffic on area roadways. This noise increase would be of short duration and would likely occur primarily during daytime hours.

The Municipal Code regulates noise from construction activities by limiting construction activities to the least intrusive periods. Municipal Code Section 7-1-190 allows construction, alteration, or repair activities which are authorized by a valid Town permit between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between the hours of 8:00 a.m. and 7:00 p.m. on Saturday. No construction, alteration, or repair activities are permitted on Sunday unless authorized by the Building Official. Construction outside of these hours would be considered a potentially significant impact. Implementation of mitigation measure **MM 13.1** would ensure that construction activities occur during daytime hours and not during the more sensitive nighttime hours, and potential annoyance at surrounding properties would be minimized. This impact would be less than significant with mitigation.

- e) ***No Impact.*** The project site is not located within 2 miles of any public airports and would not be affected by aircraft noise. There would be no impact.

4.0 ENVIRONMENTAL CHECKLIST

- f) ***No Impact.*** The project site is not located within 2 miles of any private airstrips and would not be affected by aircraft noise. There would be no impact.

Mitigation Measures

MM 13.1 Demolition and construction activities shall be restricted to the hours between 6:00 a.m. and 8:00 p.m. on weekdays and between 7:00 a.m. and 8:00 p.m. on Saturdays.

Timing/Implementation: *During demolition and construction activities*

Enforcement/Monitoring: *Town of Windsor*

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.14 POPULATION AND HOUSING. Would the project:				
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***Less Than Significant Impact.*** The project has been designed to the Town's planning policies and is consistent with the General Plan land use designation and, as a nonresidential use, would not directly affect population. Any indirect population growth generated by the project was already assumed in growth projections. Therefore, impacts related to population are less than significant.
- b) ***No Impact.*** The project site is currently developed as a gas station. None of the structures proposed for demolition provide housing. Therefore, the project would not displace any housing and would not require the construction of replacement housing elsewhere. There would be no impact.
- c) ***No Impact.*** See Issue b). There would be no impact.

Mitigation Measures

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.15 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 following public services:				
a)				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***Less Than Significant Impact.*** The project site currently operates as a gas station. Although the project proposes demolition of existing and construction of additional buildings, it is not anticipated that such an expansion would significantly increase demand for any public services. Calls for fire and police response may increase slightly; however, such an increase would not result in the need for new or expanded facilities that would result in physical environmental effects. The project will not increase housing or, in turn, the need for schools or recreational facilities. The potential environmental impacts of implementing this expansion are discussed throughout this Initial Study. Where necessary, mitigation measures are included to reduce any potential impacts to less than significant levels. Therefore, no further mitigation measures are required, and this impact would be less than significant.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.16 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***Less Than Significant Impact.*** See Issue a) in Section 4.15, Public Services. This impact would be less than significant.
- b) ***Less Than Significant Impact.*** See Issue a) in Section 4.15, Public Services. This impact would be less than significant.

Mitigation Measures

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.17 TRANSPORTATION/TRAFFIC. Would the project:				
a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Result in inadequate parking capacity for motor vehicles?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***Less Than Significant Impact.*** A focused traffic impact study was prepared for the proposed project by W-Trans (2018), which evaluated three intersections in the project vicinity to determine the potential effects of project traffic on the local roadway system. The project scenarios evaluated in the study represents a more intensive land use than that currently proposed. This results in more conservative determinations than the proposed project would otherwise achieve. The following discussion is based primarily on the findings of this report, which is attached as Appendix D.

Existing Conditions

Table 4.17-1 summarizes the existing traffic conditions at each of the study intersections during the AM and PM peak hours. As shown in the table, all study intersections are currently operating at an acceptable level of service (LOS) during the AM and PM peak hours.

TABLE 4.17-1
EXISTING CONDITIONS AM AND PM PEAK HOUR INTERSECTION LEVEL OF SERVICE

Study Intersection	Existing Conditions	
	AM Delay ¹ – LOS	PM Delay ¹ – LOS
1. ORH-Conde Ln/Windsor River Rd	34.2 – C	28.1 – C
2. ORH/US 101 SB Ramps	23.2 – C	20.4 – C
3. ORH/US 101 NB Off-ramp-Lakewood Dr	54.4 – D	54.5 – D

Source: W-Trans 2018

1. Delay is measured in average seconds of delay per vehicle.

LOS=level of service

Table 4.17-2 summarizes the existing collision rates at each study intersection. As shown in the table, the calculated collision rates for the study intersections were compared to average collision rates for similar facilities statewide. The calculated collision rates for two of the intersections are lower than the statewide average for similar facilities, indicating that these are operating within acceptable safety parameters. The Old Redwood Highway / US NB Off-ramp-Lakewood Drive has experienced collisions at a higher rate than the statewide average for similar facilities; 48.1 percent of crashes resulted in injuries, which is higher than the statewide average industry rate of 41.9 percent.

TABLE 4.17-2
COLLISION RATES AT THE STUDY INTERSECTIONS

Study Intersection	Number of Collisions (2012-2017)	Calculated Collision Rate (c/mve)	Statewide Average Collision Rate (c/mve)
1. ORH-Conde Ln/Windsor River Rd	12	0.25	0.27
2. ORH/US 101 SB Ramps	6	0.12	0.43
3. ORH/US 101 NB Off-ramp-Lakewood Dr	27	0.37	0.27

Source: W-Trans 2018

Notes: c/mve = collisions per million vehicles entering; ORH = Old Redwood Highways; **bold** text indicates collision rate higher than statewide average

Project Trip Generation

The expected trip generation potential was calculated for a more intensive scenario than the proposed project, with deductions taken for trips made to and from the existing gas station at the site, as well as for pass-by trips. After deductions are considered, the project could generate 1,540 net new primary trips on a daily basis, including 145 during the morning peak hour, and 131 during the evening peak hour.

Existing plus Project Conditions

Table 4.17-3 summarizes Existing plus Project conditions at each study intersection during the AM and PM peak hours. As shown, consistent with existing conditions, all study

intersections are forecast to continue operating at an acceptable level of service (LOS D or better for high-volume facilities, although per General Plan Policy M-3.16 the standard for Old Redwood Highway/US 101 northbound offramp at Lakewood Drive is LOS E) with the addition of project-generated trips to existing traffic volumes.

TABLE 4.17-3
EXISTING PLUS PROJECT CONDITIONS AM AND PM PEAK HOUR INTERSECTION LEVEL OF SERVICE

Study Intersection	Existing Conditions				Existing plus Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. ORH-Conde Ln/Windsor River Rd	34.2	C	28.1	C	36.3	C	34.6	C
2. ORH/US 101 SB Ramps	23.2	C	20.4	C	23.1	C	20.3	C
3. ORH/US 101 NB Off-ramp-Lakewood Dr	54.4	D	54.5	D	57.9	E	56.6	E

Source: W-Trans 2018

Notes: Average seconds of delay per vehicle; LOS=level of service; ORH = Old Redwood Highway

Summary of Impacts

All study intersections are projected to operate at acceptable levels of service (LOS E or better). Therefore, no study intersections would be significantly impacted by the proposed project. The project's impact would be less than significant.

The Old Redwood Highway/US 101 NB Off-ramp-Lakewood Drive has experienced collisions at a higher rate than the statewide average for similar facilities. While the proposed project would contribute traffic that could result in a slight increase in accidents, given the number of trips generated by the project, the increase would not be substantial.

- b) ***Less Than Significant Impact.*** Since there is not an applicable level of service standard established by the county congestion management agency, the following response addresses the latest CEQA Guidelines Appendix G Transportation question b:

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

CEQA Guidelines section 15064.3(b) states:

(b) Criteria for Analyzing Transportation Impacts.

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

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

- c) Per the Office of Planning and Research (OPR), local-serving retail development tends to reduce Vehicle Miles Traveled (VMT). Due to this reduction, OPR advises that lead agencies may generally presume that the development of local-serving retail creates a less-than-significant transportation impact with regard to VMT. Retail and retail-type projects, such as the proposed project, that are less than 50,000 sf may be presumed to be local-serving and therefore would have a less than significant VMT impact. (OPR 2018). This guidance regarding retail projects with less than 50,000 sf is further supported by the Discussion Paper issued by W-Trans regarding the application of VMT thresholds and screening in the Town of Windsor (W-Trans 2020). This discussion paper was developed to provide guidance on how VMT could be assessed for the Town of Windsor before formal thresholds are adopted. As the proposed project would consist of significantly less than 50,000 sf, it would be considered as local-serving retail, resulting in a less than significant impact related to VMT. This is further supported by the fact that the existing site already contains a convenience store, car wash, and six fueling stations. With this existing use, the proposed project's determination as local-serving retail, this impact would be less than significant. **No Impact.** The project site is not located in the immediate vicinity of any airports. Sonoma County Airport is approximately 2.5 miles south of the project site; Healdsburg Municipal Airport is approximately 8.5 northwest of the project site; and Santa Rosa Air Center is approximately 9.5 miles southeast of the project site. The proposed project would construct a gas station and commercial buildings that would be frequented by road travelers and the surrounding population. The project will not increase population or increase air traffic at any surrounding airports. Furthermore, the project does not propose any tall buildings or other structures that could interfere with aircraft operations. There would be no impact.

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- d) **No Impact.** There are no design features of the project that substantially increase hazards. Thus, the project would not create or increase any hazards, and this impact would be no impact.
- e) **Less Than Significant Impact.** No public streets or intersections would be closed to accommodate construction activities, and emergency access on public streets would not be impacted by the proposed project. Access to and from the project site would be maintained throughout the construction process. The project would improve the site's existing circulation system. Therefore, the project would have less than significant impact.
- f) **Less Than Significant Impact.** W-Trans (2018) found that existing bicycle and public transit facilities would be adequate to serve the project. However, the study recommends parking for at least 13 bicycles in the bicycle storage area. The project would have no impact on adopted policies, plans, or programs regarding alternative modes of transportation to motor vehicles.
- g) **Less Than Significant Impact.** The Town's parking requirements, in Zoning Ordinance Chapter 27.30, for general retail stores is 1 space per 200 square feet of floor area; for full service car wash is 10 spaces plus 6 spaces for each wash lane; and for service stations is 1 space per 250 square feet of floor area plus 3 spaces per service bay. Based on this requirement, the project should provide 41 spaces. The proposed parking supply for this project is 42, which is more than required by code. Thus, the project would provide sufficient parking as required by the code, with a supply of 42 spaces, there would be adequate supply to meet anticipated demand. This impact is less than significant.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.18 TRIBAL CULTURAL RESOURCES. Consultation with a California Native American Tribe that has requested such consultation may assist a lead agency in determining whether the project may adversely affect tribal cultural resources, and if so, how such effects may be avoided or mitigated. Whether or not consultation has been requested, would the project cause a substantial adverse change in a site, feature, place, cultural landscape, sacred place, or object, with cultural value to a California Native American Tribe, which is any of the following:				
a) Included or determined to be eligible for inclusion in the California Register of Historical Resources?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Included in a local register of historical resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Determined by the lead agency, in its discretion and supported by substantial evidence, to be a Tribal Cultural Resource, after applying the criteria in Public Resources Code § 5024.1(c), and considering the significance of the resource to a California Native American Tribe?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SETTING

Tribal cultural resources are defined in CEQA as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe, which may include nonunique archeological resources previously subject to limited review under CEQA.

Assembly Bill 52 Native American Consultation

AB 52 requires the lead agency (in this case, the Town) to begin consultation with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project prior to the release of a negative declaration or mitigated negative declaration if (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification and requests the consultation (Public Resources Code Section 21080.3.1[d]).

Two tribes, Lytton Rancheria and Middletown Rancheria, have requested notification regarding Town projects subject to CEQA.

Project notification letters were sent to Lytton Rancheria and Graton Rancheria on September 11, 2018. The letters provided a brief project description and requested any information regarding tribal cultural resources within the project area. On September 26, 2018, Lytton Rancheria responded that they are not requesting further consultation. On October 3, 2018, Graton Rancheria responded they

4.0 ENVIRONMENTAL CHECKLIST

would review the project within 10 days. To date, no further response has been received from Graton Rancheria; the consultation has been closed.

No tribal cultural resources (as defined in Public Resources Code Section 21074) were identified on the project site.

SUMMARY OF FINDINGS

Tribal Cultural Resources

As of this writing, Lytton Rancheria and Graton Rancheria have not requested consultation pursuant to AB 52, and therefore no tribal resources could be identified with the project area. As such, there are no known tribal cultural resources (as defined in Public Resources Code Section 21074) within the project area. Therefore, the project would have no impact on tribal cultural resources.

DISCUSSION OF IMPACTS

- a-c) ***Less Than Significant Impact With Mitigation Incorporated.*** There are no known tribal cultural resources within the project area. However, the project includes ground-disturbing activities that could result in the unanticipated or accidental discovery of tribal cultural resources. Implementation of mitigation measure **MM 5.1** (see Section 4.5) would ensure that provisions are in place to protect tribal cultural resources encountered during construction. The mitigation requires impacts on such resources to be avoided or further investigation to be conducted to offset the loss of significant information that would occur if avoidance is not possible.

Implementation of mitigation measure **MM 5.3** would ensure that human remains encountered during project activities would be treated in a manner consistent with state law. This would occur through coordination with descendant communities to ensure that the traditional and cultural values of said communities are incorporated in the decision-making process concerning the disposition of human remains that cannot be avoided.

Implementation of mitigation measures **MM 5.1** and **MM 5.3** would ensure that provisions are in place to reduce impacts on currently undiscovered tribal cultural resources and human remains to less than significant levels.

Mitigation Measures

Implement mitigation measures **MM 5.1** and **MM 5.3**.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.19 UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***Less Than Significant Impact.*** The Windsor Water District owns, operates, and maintains the wastewater collection system in Windsor. The wastewater generated at the project site would be conveyed via sewer lines to the wastewater treatment facility. The wastewater treatment facility has a current average dry weather flow of 1.4 million gallons per day (mgd). The facility has a capacity of 2.25 mgd, leaving 0.85 mgd of excess capacity. Assuming a water demand of 1,000 gallons per day per acre of commercial use (RMC 2011), the project's water demand would be approximately 1,640 gallons per day. Assuming 100 percent of the domestic water would be converted to wastewater and discharged to the wastewater treatment system, the project's wastewater generation would represent less than 1 percent of the plant's remaining capacity. Given the minimal increase in wastewater generated by the project, the wastewater treatment requirements of the North Coast RWQCB would not be exceeded. Therefore, this impact would be less than significant.

- b) ***Less Than Significant Impact.*** See Issues a) and d). The proposed project would not result in the need for any new or expanded water or wastewater treatment facilities. This impact would be less than significant.
- c) ***Less Than Significant Impact.*** See Issue c) in Section 4.10. The proposed project includes the construction of new stormwater drainage facilities on the project site due to additional hardscaping and building construction. However, no off-site improvements would be required other than the bioswales located at 8400 Windsor Road as discussed previously in this IS/MND. The potential environmental impacts associated with this construction are addressed throughout this Initial Study and, where necessary, mitigation measures are provided to reduce impacts to insignificant levels. Potential environmental effects may include temporary air pollutant and greenhouse gas emissions, disturbance of biological and cultural resources, soil erosion, use of hazardous materials, and short-term construction noise and traffic. This impact would be less than significant.
- d) ***Less Than Significant Impact.*** The General Plan EIR identifies the Town's water supply as 5,978 acre-feet per year (afy) in 2020 and 6,427 afy in 2040. Demand in 2020 and 2040 is estimated to be 4,605 afy and 4,809 afy, respectively. Because the car wash is an existing use on the site and the newer car wash would incorporate improved water reclamation technology, it is assumed that there would not be a substantial increase in water usage from the car wash compared to existing conditions. Assuming a water demand of 1,000 gallons per day per acre of commercial use (RMC 2011), the project's water demand would be approximately 1,640 gallons per day or 1.8 afy. The Town is expected to have sufficient water supply to accommodate planned development through 2040. The project would not require the expansion of current water entitlements. Therefore, impacts would be less than significant.
- e) ***Less Than Significant Impact.*** See Issue a). Project-generated wastewater would not exceed the capacity of the Windsor Water District. This impact would be less than significant.
- f) ***Less Than Significant Impact.*** There are no landfills in Windsor or in the Town's sphere of influence. The Town receives services from Sonoma County Resource Recovery (SCRR) to pick up solid waste, recyclables, and green waste. Non-recyclable solid waste and green waste are delivered to the Healdsburg Transfer Station at 166 Alexander Valley Road in Healdsburg, California. The transfer station has a permitted capacity of 720 tons per day. The Town of Windsor's waste delivery agreement requires SCRR to direct inorganic non-recyclable trash to the Central Disposal Site in Petaluma, California. The Central Disposal Site has a daily permitted disposal of about 1,050 tons per day and a remaining capacity of about 9 million cubic yards.

In addition, the state of California has mandated a 50 percent waste diversion rate that must be met by all counties. In 2006, Sonoma County had a waste diversion rate of 67 percent. This rate is expected to rise due to continued waste reduction programs such as composting and for special waste and household toxics. The County has also adopted several waste reduction initiatives, including a Carryout Bags Ordinance and the Sonoma Green Business Program, to promote and divert an amount of waste away from landfills.

The project would generate a demand for solid waste collection services; however, given the capacity of the facilities that would serve the project site, waste facilities with adequate capacity are available to accommodate the additional solid waste. Therefore, impacts would be less than significant.

- g) ***No Impact.*** The project would comply with all applicable federal, state, and local statutes and regulations related to solid waste. There would be no impact.

Mitigation Measures

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.20 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **No Impact.** The project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones (CalFIRE). As such, the proposed project would have no effect on any provisions of an emergency response plan or emergency evacuation plan related to wildfire hazards.

The project site is located within a fully urbanized area of the Town of Windsor, where there are no wildfire hazard zones. The Town of Windsor's Local Hazard Mitigation Plan (LHMP) does not designate any critical facilities or lifeline systems on or near the project site. Further, the Town's LHMP and the General Plan's Public Health and Safety Element focus on coordination, decision-making, allocation of resources, and responses to emergency circumstances by various Town and County public agencies. The proposed project would have no effect on those processes. Additionally, as the project site is not located in a very high fire hazard zone, it would not involve impacts to an emergency response plan related to wildfires.

As such, the project would not impair an adopted emergency response plan or emergency evacuation plan related to wildfires and no impacts would occur.

- b) **No Impact.** As mentioned previously, the proposed project is not located in or near State responsibility Areas or lands classified as very high fire hazard severity zones (CalFIRE 2008). Further, the project is located within a fully urbanized area of the Town of Windsor. As such, the project would not exacerbate wildfire risks and no impacts would occur.

- c) **No Impact.** As mentioned previously, the proposed project is not located in or near State responsibility Areas or lands classified as very high fire hazard severity zones (CalFIRE 2008). The project is located within a fully urbanized area of the Town of Windsor. Finally, the project would not involve the installation or maintenance of associated infrastructure due to the project site's existing use as a gas station with associated convenience store and car wash. Therefore, the project would not require construction of any special infrastructure to prevent or facilitate responses to wildfire conditions and would not exacerbate fire risk due to such improvements that could result in temporary or ongoing impacts to the environment. No impacts would occur.
- d) **No Impact.** As mentioned previously, the proposed project is not located in or near State responsibility Areas or lands classified as very high fire hazard severity zones (CalFIRE 2008). The project is located within a fully urbanized area of the Town of Windsor. Further, as discussed in **Sections 4.7 Geology and Soils** and **4.10 Hydrology and Water Quality**, the project site is flat and is located in an area that is not susceptible to potential flooding or landslide hazards, nor would the project result in significant changes to site runoff, which would be fully controlled by a new, engineered storm drain system. As such, the project would not expose people or structures to significant risks associated with wildfires, including related conditions involving runoff, post-fire slope instability, or drainage changes and no impacts would occur.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.21 MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a) ***Less Than Significant Impact With Mitigation Incorporated.*** As discussed throughout this Initial Study, the proposed project would not result in any significant impacts that cannot be mitigated to a level of less than significant. As discussed in Section 4.4, Biological Resources, with mitigation incorporated (mitigation measures **MM 4.1** through **MM 4.6**), the proposed project would result in less than significant impacts on biological resources. As discussed in Section 4.5, Cultural Resources, and Section 4.17, Tribal Cultural Resources, with mitigation incorporated (mitigation measures **MM 5.1** through **MM 5.3**), the proposed project would result in less than significant impacts on cultural resources and tribal cultural resources.
- b) ***Less Than Significant Impact With Mitigation Incorporated.*** A significant impact may occur if the project, in conjunction with other projects in the region, would result in impacts that are less than significant when viewed separately but would be significant when viewed together. As discussed throughout this Initial Study, the proposed project would not result in any significant and unmitigable impacts in any environmental issue area. In all cases, the impacts associated with the project would be reduced to less than significant levels through the implementation of mitigation measures, are limited to the project site, or are so negligible that they would not result in a significant contribution to any cumulative impacts.
- c) ***Less Than Significant Impact With Mitigation Incorporated.*** The proposed project does not have the potential to significantly adversely affect humans, either directly or indirectly, once mitigation measures are implemented. While some of the proposed project's impacts

were identified as having potential to significantly impact humans (see Issue b in Section 4.9, Hazards and Hazardous Materials), with implementation of mitigation measures and standard requirements, these impacts would be less than significant. All potentially significant impacts are avoidable, and the Town would ensure that measures imposed to protect human beings are implemented.

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5.0 THRESHOLD QUESTION COMPARISON MATRIX

Since the initial documentation and planning of this project in 2018, the state has adopted updates to the State CEQA Guidelines. These updates include changes to the threshold questions in Appendix G, which the Town uses to evaluate the impacts in Section 4.0 Environmental Checklist. As such, this Section provides a matrix that shows where in Section 4.0 information is included that provides analysis consistent with the updated Appendix G questions.

Threshold	Section Location and Comments on Updates
<u>Aesthetics. Except as provided in Public Resources Code Section 21099, W</u> would the project:	
a. Have a substantial adverse effect on a scenic vista?	No Change
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Change
c. <u>In non-urbanized areas, s</u> ubstantially degrade the existing visual character or quality of <u>public views of</u> the site and its surroundings? <u>(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?</u>	See Section 4.1 c)
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No Change
<u>Agriculture and Forestry Resources.</u> 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	No Change

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 State 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 Change
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Change
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 Change
d. Result in the loss of forest land or conversion of forest land to non-forest use?	No Change
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Change
<u>Air Quality.</u> Where available, the significance criteria established by the applicable air quality management <u>district</u> 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?	No Change
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Addressed, although not required under the most recent update to Appendix G
c. <u>b.</u> Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-	See Section 4.3 c)

5.0 THRESHOLD QUESTION COMPARISON MATRIX

attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	
d. <u>c.</u> Expose sensitive receptors to substantial pollutant concentrations?	See Section 4.3 d)
e. <u>d.</u> Create objectionable Create objectionable Result in other emissions (such as those leading to odors or dust) adversely affecting a substantial number of people?	See Sections 4.3 b) and 4.3 e)
Biological Resources. Would the project:	
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No Change
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	No Change
c. Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	See Section 4.4 c)
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No Change
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Change
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or	See Section 4.4 f) and 4.10 c)

other approved local, regional, or state habitat conservation plan?	
Cultural Resources. Would the project:	
a. Cause a substantial adverse change in the significance of a historical resource <u>pursuant to as defined</u> in § 15064.5?	See Section 4.5 a)
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	No Change
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Is now under Geology and Soils
d. c. Disturb any human remains, including those interred outside of dedicated cemeteries?	See Section 4.5 d)
Energy. Would the project:	
a. <u>Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</u>	See Section 4.6 a)
b. <u>Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</u>	See Section 4.6 b)
Geology and Soils. Would the project:	
a. Expose people or structures to <u>Directly or indirectly cause</u> potential substantial adverse effects, including the risk of loss, injury, or death involving:	See 4.7 a)
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	See 4.7 a) i.
ii. Strong seismic ground shaking?	See 4.7 a) ii.
iii. Seismic-related ground failure, including liquefaction?	See 4.7 a) iii.
iv. Landslides?	See 4.7 a) iv.
b. Result in substantial soil erosion or the loss of topsoil?	No Change
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and	No Change

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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?	See 4.7 d)
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Change
f. <u>Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</u>	See 4.5 c)
<u>Greenhouse Gas Emissions.</u> Would the project:	
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	No Change
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No Change
<u>Hazards and Hazardous Materials.</u> Would the project:	
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No Change
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?	No Change
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Change
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	No Change

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 <u>or excessive noise</u> for people residing or working in the project area?	No Change
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	
g. f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	See 4.9 g)
h. g. Expose people or structures, <u>either directly or indirectly</u> , to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	See 4.9 h)
<u>Hydrology and Water Quality.</u> Would the project:	
a. Violate any water quality standards or waste discharge requirements <u>or otherwise substantially degrade surface or ground water quality?</u>	See 4.10 a)
b. Substantially deplete <u>decrease</u> groundwater supplies or interfere substantially with groundwater recharge such that <u>the project may impede sustainable groundwater management of the basin</u> there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	See 4.10 b)
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river <u>or through the addition</u>	See 4.10 c)

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<u>of impervious surfaces</u> , in a manner which would:	
i. result in substantial erosion or siltation on- or off-site;	See 4.10 c)
ii. <u>substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;</u>	See 4.10 a)
iii. <u>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</u>	See 4.10 a); 4.10 d); 4.10 e)
iv. <u>impede or redirect flood flows?</u>	See 4.10 g); 4.10 h); 4.10 i)
d. <u>In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?</u>	See 4.10 g); 4.10 j)
e. <u>Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</u>	See 4.10 a); 4.10 b)
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	
e. 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?	
f. Otherwise substantially degrade water quality?	
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	
i. Expose people or structures to a significant risk of loss, injury or death	

involving flooding, including flooding as a result of the failure of a levee or dam?	
j. Inundation by seiche, tsunami, or mudflow?	
<u>Land Use and Planning.</u> Would the project:	
a. Physically divide an established community?	No Change
b. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	See 4.11 b)
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	
<u>Mineral Resources.</u> 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 Change
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 Change
<u>Noise.</u> Would the project result in:	
a. Exposure of persons to or 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?	See 4.13 a)
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	See 4.13 b)
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	
d. A substantial temporary or periodic increase in ambient noise levels in the	

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project vicinity above levels existing without the project?	
c. e. For a project located within <u>the vicinity of a private airstrip or</u> 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?	See 4.13 e); 4.13 f)
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	
Population and Housing. Would the project:	
a. Induce substantial <u>unplanned</u> 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)?	See 4.14a)
b. Displace substantial numbers of existing <u>people or</u> housing, necessitating the construction of replacement housing elsewhere?	See 4.14 b); 4.14 c)
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	
Public Services.	
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection? Police protection? Schools? Parks? Other public facilities?	No Change

<u>Recreation.</u>	
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No Change
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No Change
<u>Transportation/Traffic.</u> Would the project:	
a. Conflict with an applicable program plan, ordinance or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	See 4.17 a); 4.17 f)
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)? Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	See 4.17 b)
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	
d. c. Substantially increase hazards due to a <u>geometric</u> design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	See 4.17 d)
e. d. Result in inadequate emergency access?	See 4.17 e)

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f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	
<u>Tribal Cultural Resources.</u>	
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	No Change
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	No Change
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	No Change
<u>Utilities and Service Systems. Would the project:</u>	
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	
b. a. Require or result in the <u>relocation or</u> construction of new <u>or expanded</u> water, or wastewater treatment <u>or storm water drainage, electric power, natural gas, or telecommunications</u> facilities or expansion of existing facilities , the construction <u>or relocation</u> of which could cause significant environmental effects?	See 4.19 a); 4.19 b); 4.19 c)

c. <u>Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</u>	
d. <u>b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years from existing entitlements and resources, or are new or expanded entitlements needed?</u>	See 4.19 d)
e. <u>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?</u>	See 4.19 e)
f. <u>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? Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</u>	See 4.19 f)
g. <u>e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</u>	See 4.19 g)
<u>Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</u>	See 4.20
<u>a. Substantially impair an adopted emergency response plan or emergency evacuation plan?</u>	See 4.20 a)
<u>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?</u>	See 4.20 b)
<u>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</u>	See 4.20 c)

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<u>may result in temporary or ongoing impacts to the environment?</u>	
d. <u>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?</u>	See 4.20 d);
Mandatory Findings of Significance	
a. Does the project have the potential to <u>substantially</u> 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, <u>substantially</u> 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?	See 4.21 a)
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)?	No Change
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	No Change

Legend	
Bolded Text	Altered from previous checklist
<u>Bolded and Underlined</u>	New text
Strikethrough	Text that has been removed

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