

**ADMINISTRATIVE DRAFT
Storage Pro Phase 2 Project
Initial Study/Mitigated Negative Declaration
City of Santa Rosa, Sonoma County, California**

Prepared for:

City of Santa Rosa

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ACRONYMS AND ABBREVIATIONS

µg/m ³	micrograms per cubic meter
°F	degrees Fahrenheit
°C	degrees Celsius (Centigrade)
AB	Assembly Bill
AQP	Air Quality Plan
ARB	California Air Resources Board
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CAP	Clean Air Plan
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CG	General Commercial
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CRHR	California Register of Historic Resource
dBA	A-weighted decibel
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
ESA	federal Endangered Species Act
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
GHG	greenhouse gas
GPCD	gallons per capita per day
IS/MND	Initial Study/Mitigated Negative Declaration
LID	Low Impact Development
mgd	million gallons per day
MM	Mitigation Measure

Acronyms and Abbreviations

mph	miles per hour
MT	metric ton
MUP	Minor Conditional Use Permit
NAHC	Native American Heritage Commission
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
PM ₁₀	particulate matter with aerodynamic diameter less than 10 microns
PM _{2.5}	particulate matter with aerodynamic diameter less than 2.5 microns
PPV	peak particle velocity
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SCWA	Sonoma County Water Agency
SFBAAB	San Francisco Bay Area Air Basin
SR	State Route
TAC	toxic air contaminant
TCR	Tribal Cultural Resources
UCMP	University of California Museum of Paleontology
USFWS	United States Fish and Wildlife Services
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compound
ZEV	Zero Emission Vehicle

SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts from implementation of the Storage Pro Phase 2 Project in the City of Santa Rosa, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Santa Rosa is the Lead Agency in the preparation of this IS/MND and any additional environmental documentation required for the project. The City has discretionary authority over the proposed project. The intended use of this document is to determine the level of environmental analysis required to adequately prepare the project IS/MND and to provide the basis for input from public agencies, organizations, and interested members of the public.

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

1.2 - Project Location

The 2.66-acre project site is located at 4332-4374 Sonoma Highway (State Route 12 [SR-12]) in the eastern portion of the City of Santa Rosa, Sonoma County, California (Exhibit 1). The project site is bounded by Mission Ace Hardware & Lumber (west), Sonoma Highway (north), the existing Storage Pro (Phase 1) facility (east), and Santa Rosa Creek (south); refer to Exhibit 2. The project site is located on the Santa Rosa, California United States Geological Survey (USGS) 7.5-Minute Topographical Quadrangle, Range 7 West, Township 7 North, Section (Latitude 38° 27' 25" North; Longitude 122° 40' 34" West).

1.3 - Environmental Setting

1.3.1 - Development and Land Use Activities

The project site consists of four parcels (Assessor's Parcel Numbers 032-140-01; 032-010-009; -043; and -044) that contain a residential duplex and several commercial structures with end users including rug repair, furniture, health and beauty, and piano tuning. All of the commercial structures are one-story in height and include residences that have been repurposed for non-residential use. Outdoor storage of vehicles, boats, and trailers occurs throughout the site.

Vehicular access is taken from three driveways on Sonoma Highway. Parking is provided in paved areas around the buildings.

Several mature trees are scattered throughout the site. The rear of the site is unpaved.

Santa Rosa Creek and an associated Class I multi-use path (known as the 4th and Farmers Creek Trail) are located south of the project site.

The existing 15-inch diameter Los Alamos Sewer Trunk crosses through the southern portion of the project site within an easement. The existing buildings on the project site as well as the Storage Pro facility discharge their effluent into this existing sewer line.

General Plan and Zoning Designations

The project site is designated “Retail and Businesses Services” by the City of Santa Rosa General Plan and zoned General Commercial (CG) by the Santa Rosa Development Code.

1.4 - Project Description

The applicant is proposing to remove the existing uses, adjust the parcel boundaries to create two lots, and develop 30 multi-family dwelling units and a storage facility. The multi-family dwelling units would consist of 1-, 2-, and 3-bedroom floorplans. The storage facility would consist of a 149,000 square-foot building on a separate 1.66-acre parcel. Table 1 summarizes the project. Exhibit 3 depicts the site plan. Exhibit 4 depicts the lot line adjustment.

Table 1: Project Summary

Acreage	End Use	Quantity	Characteristics
1.00	Apartments	30 units (26,166 square feet)	Three-story buildings (40 feet above finished grade); 1-, 2-, and 3- bedroom floorplans
1.66	Storage Facility	149,000 square feet	Three-story building

Source: Archilogix 2019.

1.4.1 - Design and Appearance

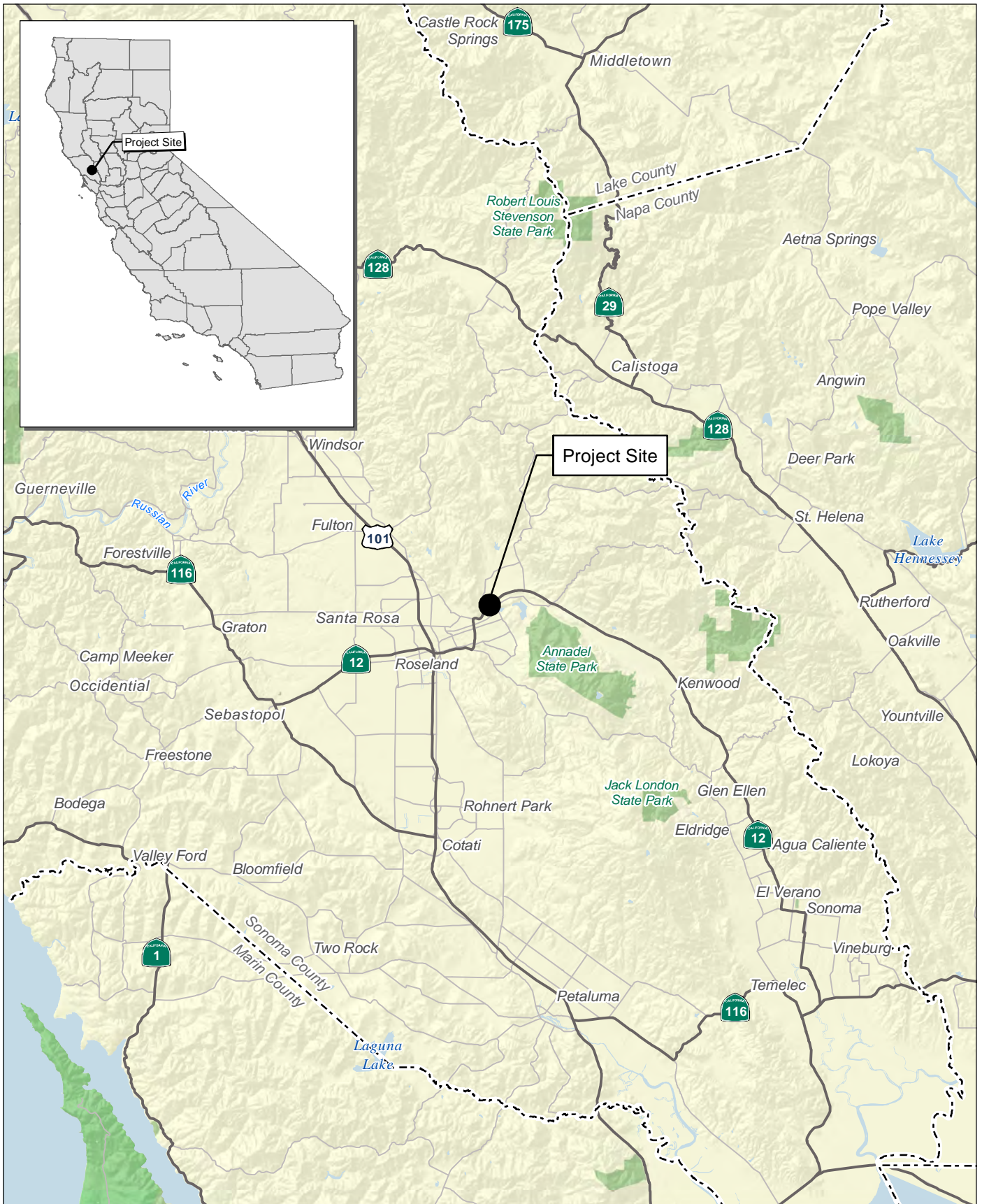
The multi-family units would be located within a three-story building that would be adjacent to the Sonoma Highway frontage. The buildings would employ a “Farmhouse” vernacular and include elements such as extended roof eaves and horizontal articulation. Each unit would have a deck or patio.

The storage facility would be three stories tall and employ concrete masonry unit perimeter walls, metal trim/flushing, and roll-up and swing doors.

1.4.2 - Vehicular Access

Vehicular access to the multi-family uses would be taken from a driveway on Sonoma Highway.

Ingress to the storage facility would be provided from the neighboring Storage Pro facility. An “exit only” gated connection to the multi-family driveway would provide egress from the storage facility to Sonoma Highway.



Source: Census 2000 Data, The CaSIL

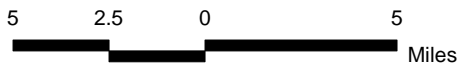
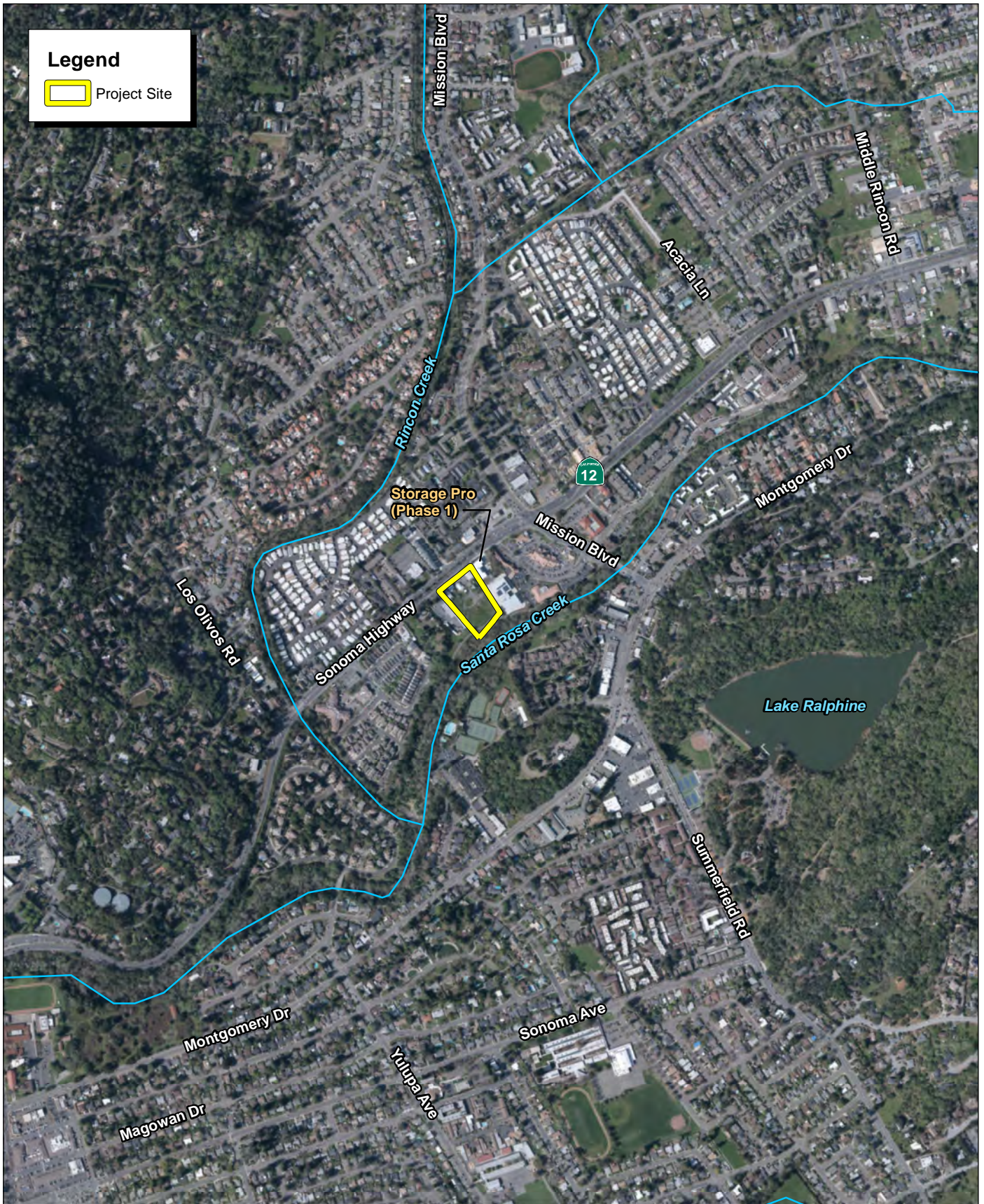


Exhibit 1

Regional Location Map

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Source: ESRI Aerial Imagery.

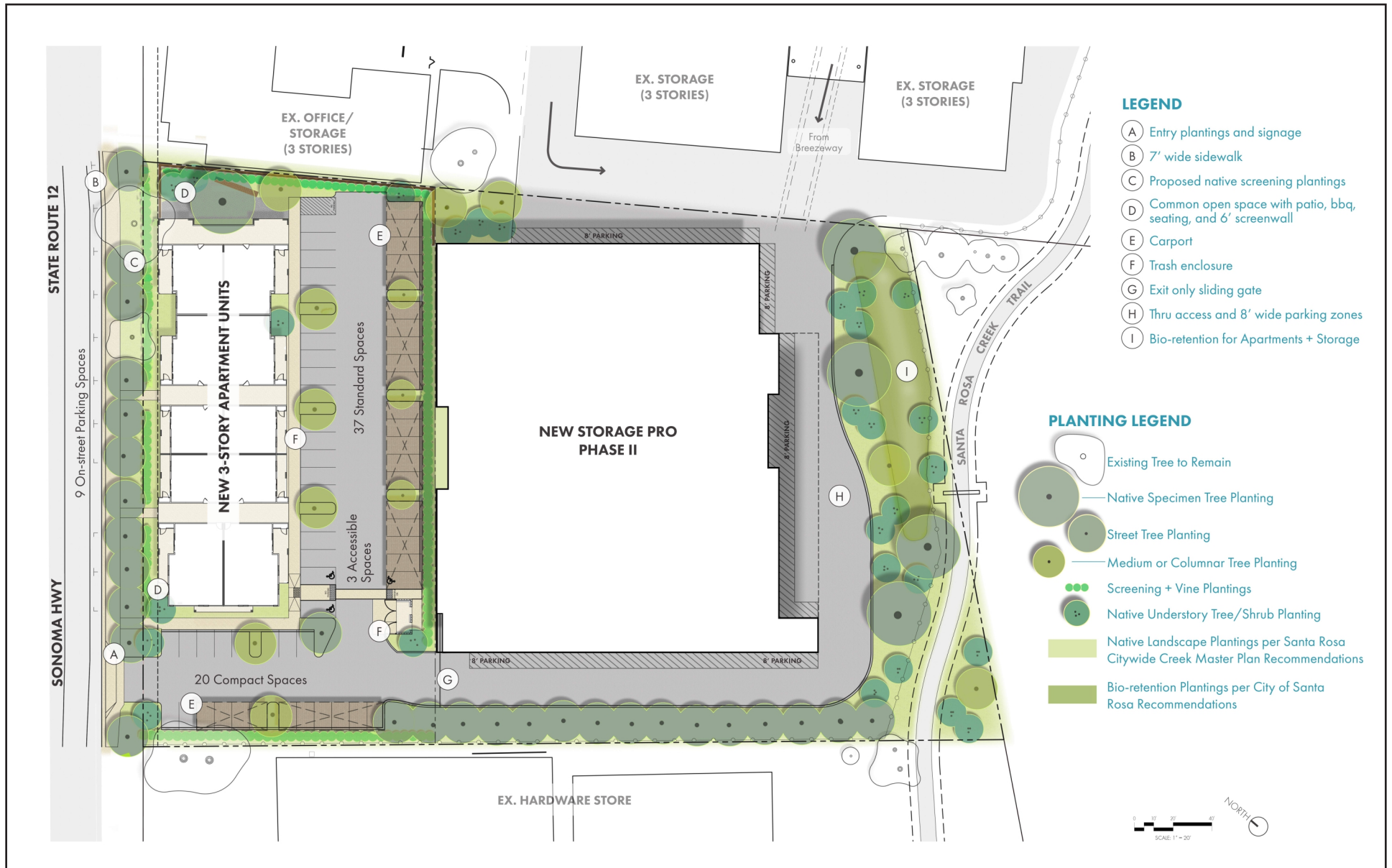
Exhibit 2

Local Vicinity Map

Aerial Base

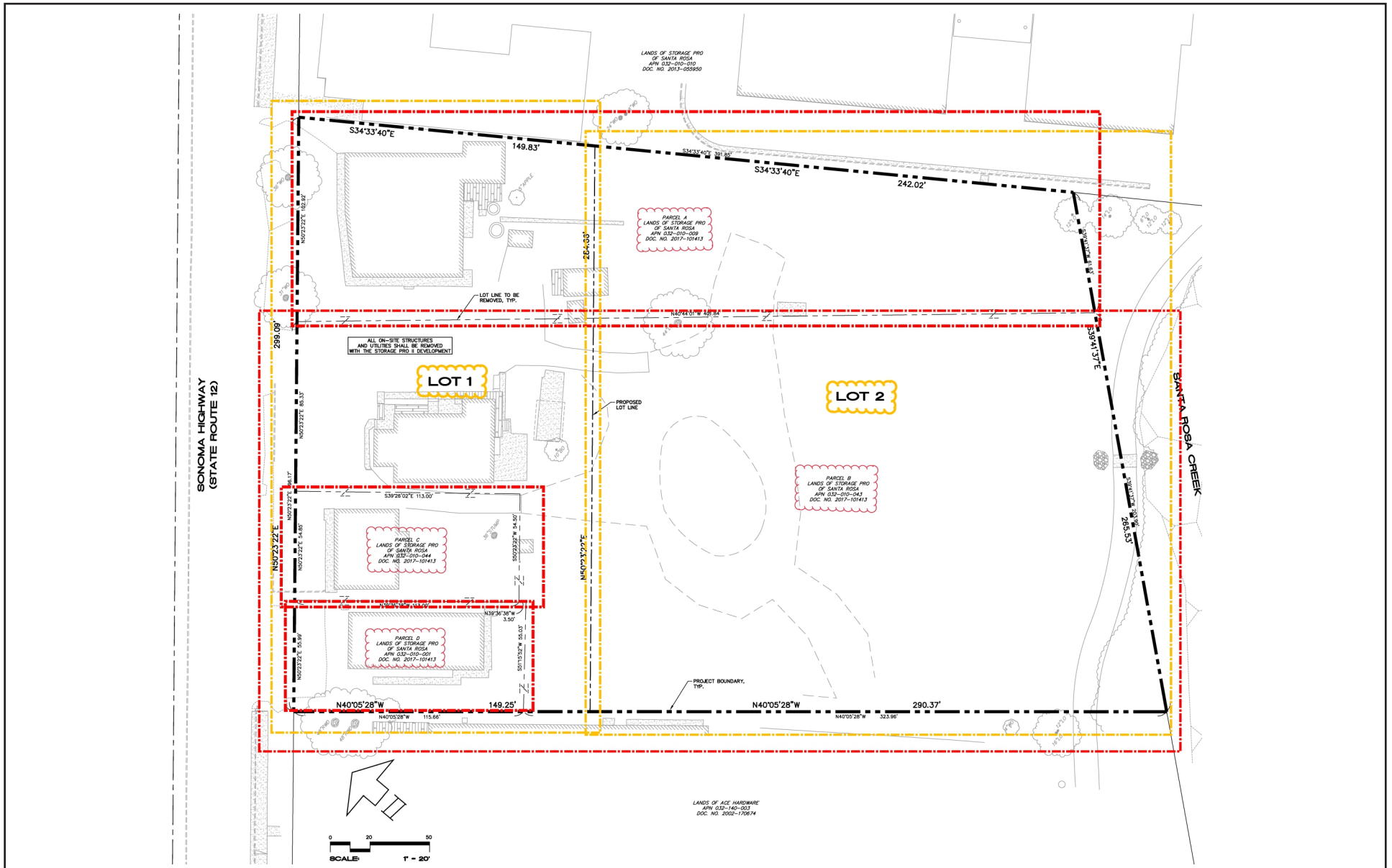


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Source: QUADRIGA landscape architecture and planning, July 2018.

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Source: Civil Design Consultants, Inc., October 22, 2018.

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1.4.3 - Parking/Loading

The multi-family uses would have 60 off-street spaces and nine on-street spaces.

The storage facility would allow parking and loading within 8-foot wide zone adjacent to the perimeter of the structure.

1.4.4 - Storm Drainage

A storm drainage system consisting of inlets and underground piping would convey runoff to a 5,010.1 cubic-foot bio retention basin in the southern portion of the project site, adjacent to the 4th and Farmers Creek Trail.

1.4.5 - Wet Utilities

The multi-family buildings and storage facility would be served with separate metered potable water laterals to an existing water line within Sonoma Highway. Each lateral would be 8 inches in diameter.

The multi-family buildings and storage facility would be served with separate sewer laterals to an existing 15-inch diameter sanitary sewer trunk line located within the rear of the project site. Each lateral would be 4 inches in diameter and connect to a new 6-inch diameter sewer connection that would tie into the existing sewer line.

All service laterals would be located underground.

The City of Santa Rosa plans to implement the Los Alamos Sewer Trunk Replacement Project (C01903) that would upsize the existing 15-inch diameter sewer line to a 24-inch diameter sewer line. The site plan reserves room for and avoids encroachment into this future 20-foot wide easement. The sewer trunk replacement project is independent of the proposed project and is subject to separate environmental review. The proposed project would discharge effluent into the upsized sewer main once operational.

1.4.6 - Dry Utilities

The proposed project would be served with electricity generated by Sonoma Clean Power and delivered by Pacific Gas and Electric Company (PG&E). The proposed project would be served with natural gas procured and delivered by PG&E. All service laterals would be located underground. The existing overhead utilities along Sonoma Highway would remain as is.

1.4.7 - Creek Setback

The storage facility would maintain a required creek setback from Santa Rosa Creek. No structures would be developed within this area.

1.5 - Required Discretionary Approvals

The proposed project requires the following discretionary approvals from the City of Santa Rosa:

- Mitigated Negative Declaration Adoption
- Lot Line Adjustment
- Design Review
- Minor Conditional Use Permit

1.6 - Intended Uses of this Document

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

Bill Rose, AICP, Senior Planner
City of Santa Rosa
Community Development Department
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 9540
Phone: 707.543.3200
Email: wrose@srcity.org

SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected

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

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture 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/Soils	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards/Hazardous Materials
<input type="checkbox"/> Hydrology/Water Quality	<input type="checkbox"/> Land Use/Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population/Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input type="checkbox"/> Transportation	<input type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities/Services Systems	<input type="checkbox"/> Wildfire	<input type="checkbox"/> Mandatory Findings of Significance

Environmental Determination

On the basis of this initial evaluation:

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

Date: August 5, 2019 Signed: Bill Rose, AICP, Senior Planner

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

Environmental Evaluation

Would the project:

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

Less than significant impact. The City of Santa Rosa General Plan Policy UD-A-1 calls for the maintenance of view corridors to natural ridgelines and landmarks, such as the Taylor and Bennett Mountains, as scenic corridors. The project site contains existing structures that serve to obstruct views of the ridgelines associated with Taylor and Bennett Mountains. The proposed project would remove the existing buildings on the project site and develop two, three-story apartment buildings along the Sonoma Highway (SR-12) frontage and a three-story storage facility in the rear of the site. Thus, to the extent that there are views of the natural ridgelines available from SR-12, they would remain obstructed by buildings. Impacts would remain less than significant.

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

Less than significant impact. The California Department of Transportation identifies officially designated scenic highways through the California Scenic Highway Mapping System. The project site is adjacent to SR-12 (Sonoma Highway), which is an eligible State Scenic Highway, but is not an “officially designated” State Scenic Highway.

The proposed project would remove the existing buildings on the project site and develop two three-story apartment buildings along the Sonoma Highway frontage and a three-story storage facility in the rear of the site. Off-street parking would be located behind and to the side of the apartment buildings. Landscaping would be provided along the Sonoma Highway frontage, along the side and rear properties lines, and within the parking area. The storage facility would be largely screened from the Sonoma Highway frontage by the apartment buildings. One vehicular access point would be provided on Sonoma Highway, a net reduction of two relative to existing conditions.

Overall, the proposed project would represent an improvement of the quality of the SR-12 viewshed relative to existing conditions as parking would be screened and landscaping would be provided. Impacts would be less than significant.

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

Less than significant impact. The project site contains several commercial structures with end users including rug repair, furniture, health and beauty, and piano tuning. All of the structures are one-story in height and include residences that have been repurposed for commercial uses. Outdoor storage of vehicles, boats, and trailers occurs throughout the site. Off-street parking occurs in front of buildings along the Sonoma Highway frontage. Landscaping is limited to several mature trees and shrubs. Overall, the project site is best characterized as a juxtaposition of dilapidated residential and commercial buildings of unremarkable visual appearance.

The proposed project would remove the existing buildings on the project site and develop two three-story apartment buildings along the Sonoma Highway frontage and a three-story storage facility in the rear of the site. Off-street parking would be located behind and to the side of the apartment buildings. Landscaping would be provided along the Sonoma Highway frontage, along the side and rear properties lines, and within the parking area. The storage facility would be largely screened from the Sonoma Highway frontage by the apartment buildings. One vehicular access point would be provided on Sonoma Highway, a net reduction of two relative to existing conditions.

Although the new buildings would be taller and have more mass than the existing structures, they would further City planning objectives by locating buildings along street frontages, screening off-street parking, and providing ample landscaping. Moreover, the development meets the general plan goals for urbanized design goals along Sonoma Highway in the subject area. Additionally, the proposed project would maintain the required setback from Santa Rosa Creek and, thus, avoid encroachment onto this visual resource. Overall, the proposed project would represent an improvement in visual character relative to existing conditions. Impacts would be less than significant.

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

Less than significant impact. The project site has existing sources of light and glare. Existing sources of light in the vicinity of the project site include lighting from the existing structures and street lights along Sonoma Highway.

The proposed project would remove the existing buildings on the project site and develop two, three-story apartment buildings along the Sonoma Highway frontage and a three-story storage facility in the rear of the site. The new buildings would employ lighting for safety and security purposes. In accordance with City Code requirements, exterior light fixtures would employ full cutoff fixtures, be shielded, or be directed downward. This would prevent light trespass onto neighboring properties and keep nighttime lighting levels at an intensity appropriate for the surrounding area. Impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>2. Agriculture and Forestry Resources <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i></p>				
<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>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))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

Would the project:

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

No impact. The California Department of Conservation Farmland Mapping and Monitoring Program mapping for Sonoma County designates the project site as “Urban and Build-up Land,” and therefore

would not convert any farmland protected by the state. Therefore, there would be no conversion of any farmland to non-agricultural use because of the project. No impacts would occur.

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

No impact. The project site does not support agricultural land use activities and, therefore, is not eligible for a Williamson Act contract. The project site is zoned General Commercial (CG) by the Santa Rosa Development Code, which is a non-agricultural zoning district. Therefore, the proposed project would not conflict with existing agricultural zoning or with a Williamson Act contract. No impacts would occur.

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

No impact. The project site is zoned General Commercial “CG” by the Santa Rosa Development Code, which is a non-forest land zoning district. No forest land is located on or in the immediate vicinity of the project site. Accordingly, no impact would occur.

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

No impact. The project site does not contain any land under a Williamson Act contract. The project site is zoned CG by the Santa Rosa Development Code, which is a non-forest land zoning district. No forest land is located on or in the immediate vicinity of the project site. As such, project implementation would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

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

No impact. There is no Important Farmland or forest land in the project vicinity. As such, this condition precludes the possibility of the project creating pressures to convert farmland or forestland to a different use. Therefore, no impacts associated with the conversion of Farmland or forest land would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
3. Air Quality <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i> <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

This section is based, in part, emission estimates prepared by FirstCarbon Solutions (FCS). Supporting information is provided in Appendix A.

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

Would the project:

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

Less than significant impact within mitigation incorporated. The United States Environmental Protection Agency (EPA) and the California Air Resources Board (ARB) designate air basins where ambient (monitored) pollutant concentration levels are above the applicable air quality standards as “nonattainment” areas. If ambient pollutant concentration levels are below the applicable air quality standards, then the area is an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, then the areas are considered “unclassified.” The EPA and ARB have classified the San Francisco Bay Area Air Basin (SFBAAB) as nonattainment for the State ozone standards, the State particulate matter with aerodynamic diameter less than 10 microns (PM₁₀) standards, and the State particulate matter with aerodynamic diameter less than 2.5 microns (PM_{2.5}) standards. In addition, the EPA has classified the SFBAAB as nonattainment for federal 8-hour ozone and PM_{2.5}. The region is attainment or unclassified for all other ambient air quality standards. The Bay Area Air Quality Management District (BAAQMD) prepares air quality plans that include

projected emissions inventories and account for emissions reductions strategies in order to demonstrate how the region will achieve the ambient air quality standards by the given deadlines.

In April 2017, BAAQMD adopted their 2017 Clean Air Plan (2017 CAP), which serves as the regional Air Quality Plan (AQP) for the SFBAAB for attaining federal ambient air quality standards. The primary goals of the 2017 CAP are to protect public health and protect the climate. The 2017 CAP acknowledges that the BAAQMD's two stated goals of protection are closely related. As such, the 2017 CAP identifies a wide range of control measures intended to decrease both criteria pollutants¹ and greenhouse gases (GHGs).² The 2017 CAP also accounts for projections of population growth provided by Association of Bay Area Governments and vehicle miles traveled provided by the Metropolitan Transportation Commission, and identifies strategies to bring regional emissions into compliance with federal and State air quality standards. A project would be judged to conflict with or obstruct implementation of the 2017 CAP if it would result in substantial new regional emissions not foreseen in the air quality planning process.

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

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

1. Does the project support the primary goals of the Air Quality Plan (AQP)?

The applicable General Plan for the project is the Santa Rosa 2035 General Plan, which was adopted in November 2009, which is prior to the BAAQMD's adoption of the latest AQP. The project site is designated "Retail and Businesses Services" by the City of Santa Rosa General Plan and zoned "Commercial, General (CG)" by the Santa Rosa Development Code. Therefore, emissions related to development of the project site would have been included in growth forecasts for the current AQP as "Retail and Business Services." The project would remove the existing buildings and develop a residential apartment building and storage facility in their place. The storage portion of the project is consistent with the General Plan and CG designation by providing a storage facility. As part of the proposed project, a Minor Conditional Use Permit (MUP) would be obtained to allow the 1.0-acre residential portion of the project site to be developed with 30 dwelling units.

As shown in Table 2, residential development on the site would not result in an increased number of vehicle miles traveled (VMT). Table 2 shows the estimated annual VMT for the 1.0-acre portion of the project site under two scenarios: (1) developed as a regional shopping center, consistent with the current General Plan designation; and (2) developed as 30 multi-

¹ EPA has established national ambient air quality standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as "criteria" air pollutants (or simply "criteria pollutants").

² A GHG is any gaseous compound in the atmosphere that is capable of absorbing infrared radiation, thereby trapping and holding heat in the atmosphere. By increasing the heat in the atmosphere, GHGs are responsible for the greenhouse effect, which ultimately leads to global warming.

family dwelling units, in accordance with the proposed project. As shown in Table 2, the project would reduce annual VMT compared to the regional shopping center scenario. This reduction is attributable to the lower trip generation rates associated with the proposed project. The residential portion of the project is estimated to have an average weekday trip generation rate of 7.32 daily trips per dwelling unit, while a regional shopping center is estimated to have an average weekday trip generation rate of 37.75 daily trips per 1,000 square feet.

Table 2: Vehicle Miles Traveled Comparison

Scenario	Total Annual VMT
Project site developed as a shopping center, consistent with the current General Plan designation ¹	2,234,222
Project site developed in accordance with the proposed project	505,012
<p>Notes: VMT = vehicle miles traveled ¹ To estimate VMT, it was assumed that the project site could be developed with a shopping center totaling 34,848 square feet, which represents a conservative Floor Area Ratio of 0.3 for the 2.66-acre (115, 869 square feet) project site. Source of existing general plan land use designation VMT: CalEEMod output based on trip generation rates for a shopping center land use from the <i>Institute of Transportation Engineers Trip Generation Manual, 10th Edition</i>. Source of project VMT: CalEEMod output based on assumptions consistent with the Focused Traffic Study for the Storage PRO Phase II Project prepared for the project by W-Trans (2018). See Appendix A for complete CalEEMod outputs.</p>	

Because the project would not increase the VMT generated by the project site compared to the assumptions used in the AQP, it is reasonable to conclude that the project would not adversely affect the AQP. Furthermore, as discussed in Impact 3(b), the project’s long-term construction and operational-related emissions would not exceed BAAQMD regional thresholds of significance on an average daily or annual basis. Because VMT generated by the project site has been accounted for in the AQP and because the project would not exceed BAAQMD regional thresholds of significance on an average daily or annual basis, the project would be consistent with the first criterion.

2. Does the project include applicable control measures from the AQP?

Regardless of significance, all projects within BAAQMD’s jurisdiction are required to implement the BAAQMD Basic Construction Mitigation Measures. As discussed in Impact 3(b), the project would implement all BAAQMD Basic Construction Mitigation Measures (Table 8-1 in BAAQMD CEQA Air Quality Guidelines, May 2017), which would be consistent with the assumptions in the AQP. Mitigation Measure (MM) AIR-1 would ensure the implementation of the BAAQMD Basic Construction Mitigation Measures. Furthermore, the project would comply with all applicable BAAQMD rules and regulations.

3. Does the project disrupt or hinder implementation of any AQP control measures?

The project would comply with all required control measures and rules and regulations required by BAAQMD during construction and operation. The project would not include any special features that would disrupt or hinder implementation of the AQP control measures.

Conclusion

Considering the information above, the project supports the AQP and City of Santa Rosa General Plan and would not conflict with or obstruct implementation of the applicable air quality plan. The project would be consistent with the three criteria after the incorporation of MM AIR-1. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality plan after incorporation of mitigation.

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

Less than significant impact with mitigation incorporated. This impact relates to localized and regional criteria pollutant impacts from project construction and operation. Potential regional impacts would result in exceedances of state or federal standards for oxides of nitrogen (NO_x), particulate matter (PM₁₀ and PM_{2.5}), or ROG (reactive organic gases). NO_x emissions are of concern because of potential health impacts from exposure to NO_x emissions during both construction and operation and as a precursor in the formation of airborne ozone. PM₁₀ and PM_{2.5} are of concern during construction because of the potential to emit exhaust emissions from the operation of off-road construction equipment and fugitive dust during earth-disturbing activities (construction fugitive dust). Carbon monoxide (CO) emissions are of concern during project operation because operational CO hotspots are related to increases in on-road vehicle congestion, which have the potential to contribute to localized impacts.

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

Construction Emissions

During construction, fugitive dust (PM₁₀ and PM_{2.5}) would be generated from site grading and other earth-moving activities. The majority of this fugitive dust would remain localized and would be deposited near the project site. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from this source. Exhaust emissions would also be generated from the operation of the off-road construction equipment.

Construction Fugitive Dust

BAAQMD does not recommend a numerical threshold for fugitive dust particulate matter emissions. Instead, BAAQMD bases the determination of significance for fugitive dust on a consideration of the

control measures to be implemented. If all appropriate emissions control measures are implemented for a project as recommended by BAAQMD, then fugitive dust emissions during construction are not considered significant.

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

Construction Air Pollutant Emissions: ROG, NO_x, PM₁₀, PM_{2.5}

The California Emissions Estimator Model (CalEEMod) version 2016.3.2 was used to estimate the project’s construction-related exhaust emissions. CalEEMod provides a consistent platform for estimating construction and operational emissions from a wide variety of land use projects and is the model recommended by the BAAQMD for estimating project emissions. Estimated construction emissions are compared with the applicable thresholds of significance established by the BAAQMD to assess ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5} construction emissions to determine significance for this criterion.

It is anticipated that the project would be developed in a single phase, with construction beginning in April 2019³. Construction emissions would likely decrease because of improvements in technology and more stringent regulatory requirements if the construction schedule moves to later years. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA guidelines. Complete construction assumptions, as well as complete emission estimates, are provided as Appendix A of this IS/MND. Table 3 shows the annual construction emissions, while average daily construction emissions are compared with the significance thresholds in Table 4.

Table 3: Annual Construction Emissions (Unmitigated)

Construction Activity	Tons/Year			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
2019				
Demolition	0.03	0.32	0.01	0.01
Site Preparation	0.00	0.03	0.00	0.00
Grading	0.01	0.07	0.00	0.00
Building Construction (2019)	0.28	2.06	0.10	0.09
<i>2019 Subtotal</i>	<i>0.32</i>	<i>2.48</i>	<i>0.11</i>	<i>0.11</i>
2019				
Building Construction (2020)	0.08	0.59	0.03	0.02

³ Although April 2019 has passed, the use of this date provides for a conservative assessment of project emissions because the CalEEMod model is predicated on the construction fleet getting cleaner over time.

Table 3 (cont.): Annual Construction Emissions (Unmitigated)

Construction Activity	Tons/Year			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
Paving	0.01	0.06	0.00	0.00
Architectural Coating	1.00	0.01	0.00	0.00
<i>2020 Subtotal</i>	<i>1.09</i>	<i>0.65</i>	<i>0.03</i>	<i>0.03</i>
2019–2020				
Total Construction Emissions	1.40	3.13	0.14	0.14
Notes: ROG = reactive organic gases NO _x = oxides of nitrogen PM ₁₀ = particulate matter 10 microns in diameter PM _{2.5} = particulate matter 2.5 microns in diameter Unrounded numbers from the CalEEMod output were used for all calculations. Source: CalEEMod Output (see Appendix A).				

Table 4: Construction Emissions (Unmitigated Average Daily Rate)

Parameter	Air Pollutants			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
Total Emissions (tons/year)	1.40	3.13	0.14	0.14
Total Emissions (lbs/year)	2,803	6,270	286	272
Average Daily Emissions (lbs/day) ¹	10.42	23.31	1.06	1.01
Significance Threshold (lbs/day)	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No
Notes: ¹ Calculated by dividing the total lbs by the total 269 working days of construction for the duration of construction (2019–2020). Calculations use unrounded totals. lbs = pounds ROG = reactive organic gases NO _x = oxides of nitrogen PM ₁₀ = particulate matter 10 microns in diameter PM _{2.5} = particulate matter 2.5 microns in diameter Source: CalEEMod Output (see Appendix A).				

As shown in Table 4, construction emissions from all construction activities are below the recommended thresholds of significance; therefore, the construction of the project would have less than significant impact in regards to emissions of ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5}.

Operational Emissions

Operational Carbon Monoxide Hotspot

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

The BAAQMD recommends a screening analysis to determine if a project has the potential to contribute to a CO hotspot. The screening criteria identify when site-specific CO dispersion modeling is necessary. The project would result in a less than significant impact to air quality for local CO if the following screening criteria are met:

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

As indicated in Section 17, Transportation, the project would not conflict with the applicable congestion management program. No intersections impacted by the project would experience traffic volumes of 44,000 vehicles per hour. According to the Focused Traffic Study for the Storage Pro Phase II Project by W-Trans (Appendix E), the proposed project would be expected to result in an average of 445 new trips per day including 29 trips during the AM peak-hour and 42 trips during the PM peak-hour. The nearest intersection to the project site with data available from the Sonoma Traffic Surveys is Montecito Avenue and Woodbrae Lane. With the intersection of Montecito Avenue and Woodbrae Lane only carrying approximately 764 daily trips, none of the intersections near the proposed project site would have peak hourly traffic volumes exceeding 44,000 vehicles per hour. Furthermore, the adjacent roadways are not located in an area where vertical or horizontal atmospheric mixing is substantially limited. Therefore, based on the above criteria, the project would not exceed the CO screening criteria and would have a less than significant impact related to CO.

Operational Air Pollutant Emissions: ROG, NO_x, PM₁₀, PM_{2.5}

Pollutants of concern include ROG, NO_x, PM₁₀, and PM_{2.5}. Operational emissions are those emissions that occur when the project commences operations. Operations were analyzed assuming full-buildout in 2021. Assumptions used to estimate operational emissions were consistent with those presented in the Focused Traffic Study. Consistent with the Focused Traffic Study, the baseline vehicle trips and associated emissions were assumed to be zero. The major sources for operational emissions of ROG, NO_x, PM₁₀, and PM_{2.5} are summarized in Appendix A. The project operational emissions for the respective pollutants were calculated using CalEEMod version 2016.3.2. The results for the annual net emissions from project operations are presented in Table 5, while estimated maximum daily net emissions are shown in Table 6.

Table 5: Annual Operational Emissions (Unmitigated)

Emissions Source	Tons per Year			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Area	0.81	0.00	0.00	0.00
Energy	0.00	0.04	0.00	0.00
Mobile (Motor Vehicles)	0.16	0.83	0.46	0.13
Estimated Annual Emissions	0.97	0.87	0.46	0.13
Thresholds of Significance	10	10	15	10
Exceeds Significance Threshold?	No	No	No	No
Notes: ROG = reactive organic gases NO _x = oxides of nitrogen PM ₁₀ = particulate matter 10 microns or less in diameter PM _{2.5} = particulate matter 2.5 microns or less in diameter Source: CalEEMod Output (see Appendix A).				

Table 6: Maximum Daily Operational Emissions (Unmitigated)

Emissions Source	Pounds per Day			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Area	4.47	0.12	0.02	0.02
Energy	0.02	0.20	0.02	0.02
Mobile (Motor Vehicles)	1.15	5.45	3.05	0.84
Estimated Maximum Daily Project Emissions	5.65	5.77	3.09	0.88
Thresholds of Significance	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No
Notes: ROG = reactive organic gases NO _x = nitrous oxides PM ₁₀ = particulate matter 10 microns or less in diameter PM _{2.5} = particulate matter 2.5 microns or less in diameter The highest daily project emissions occurred in the winter run for NO _x , PM ₁₀ , and PM _{2.5} . The highest ROG emissions occurred in the summer run. Calculations use unrounded results. Source: CalEEMod Output (see Appendix A).				

As shown in Table 5 and Table 6, the project would not result in operational-related air pollutants or precursors that would exceed BAAQMD’s thresholds of significance, indicating that ongoing project operations would not be considered to have the potential to generate a significant quantity of air pollutants. Therefore, long-term operational impacts associated with criteria pollutant emissions would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. A sensitive receptor is defined by the BAAQMD as the following: “Facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals, and residential areas.” As a proposed mixed-use development that would include residential dwelling units, the project itself would be considered a sensitive receptor land use. Existing sensitive receptors are located to the north, west, and southeast of the project site.

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

- **Criterion 1:** Construction of the project would not result in an exceedance of the health risk significance thresholds.
- **Criterion 2:** Operation of the project would not result in an exceedance of the health risk significance thresholds.
- **Criterion 3:** The cumulative health impact would not result in an exceedance of the cumulative health risk significance thresholds.

Criterion 1: Project Construction Toxic Air Pollutants

Diesel particulate matter (DPM) has been identified by the ARB as a carcinogenic substance. The BAAQMD’s latest threshold of significance for toxic air contaminant (TAC) emissions is an increase in cancer risk for the maximally exposed individual of greater than 10 in a million (formerly 10 in a million).

Construction-related activities would result in short-term, project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing), building construction, and other miscellaneous activities. Maximum PM₁₀ and PM_{2.5} emissions would occur during site preparation and grading/excavation activities, which require the largest number of heavy-duty diesel equipment. This period is expected to last less than three months. PM emissions would decrease for the remaining construction period, because construction activities such as building construction and paving would require less construction equipment. While the maximum DPM emissions associated with grading/excavation activities would only occur for a portion of the overall construction period, this activity represents the worst-case condition for the total construction period. This would represent less than 1 percent of the total 70-year lifetime exposure period commonly used to estimate health risks. Furthermore, construction equipment fleet operators are subject to the ARB’s In-Use Offroad Equipment Fleet Regulation requiring the use of increasing amounts of lower-emitting equipment that will help to ensure that risk would not exceed BAAQMD thresholds. As such, the impact would be less than significant, and mitigation would not be required.

Criterion 2: Project-Specific Operational Toxic Air Pollutants

The project involves the development of 30 multi-family dwelling units and a 149,000-square-foot storage facility on the project site and would not have on-site TACs sources during operation. According to the Focused Traffic Study prepared for the project by W-Trans (2018), the proposed project would be expected to result in an average of 445 new trips per day including 29 trips during the a.m. peak-hour and 42 trips during the p.m. peak-hour. The proposed project would primarily generate trips for residents, visitors, employees, and customers traveling to and from the project site. The daily travel trips to and from the project site would primarily be generated by passenger vehicles. Because nearly all passenger vehicles are gasoline-combusted, the project would not generate significant amount of DPM emissions during operation. Therefore, the project would not result in significant health impacts to nearby sensitive receptors during operation.

Criterion 3: Cumulative Health Risk Assessment

The BAAQMD recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project. As a result, a cumulative Health Risk Assessment (HRA) was performed that examined the cumulative impacts of the project's construction emissions and sources of TAC emissions within 1,000 feet of the project. As discussed in Criteria 2 and 3, the project is not expected to generate substantial pollutant concentrations in the construction or operational phase. However, as a mixed-use project that would include the development of residential units, the project has the potential to place sensitive receptors near existing sources of TACs. Therefore, the cumulative health impacts were estimated at the project site.

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

- **Surface Street Screening Tables.** BAAQMD pre-calculated potential cancer risks and PM_{2.5} concentration increases for each county within their jurisdiction for roadways that meet BAAQMD's "major roadway" criteria of 10,000 vehicles or 1,000 trucks per day. Risks are assessed by roadway volume, roadway direction, and distance to sensitive receptors. There are two major roadways located within 1,000 feet of the site boundary. Mission Boulevard, located approximately 620 feet east of the project site, is estimated to generate 23,938 vehicle trips per day. Montgomery Drive is located approximately 950 feet south of the project and is estimated to generate 26,566 vehicle trips per day.
- **Freeway Screening Analysis Tool.** BAAQMD prepared a Google Earth file that contains pre-estimated cancer risk, hazard index, and PM_{2.5} concentration increases for highways within the Bay Area. Risks are provided by roadway link and are estimated based on direction and distance to the sensitive receptor. SR-/Sonoma Highway bounds the project site to the north.
- **Stationary Source Risk and Hazard Screening Tool.** BAAQMD prepared a Google Earth file that contains the locations of all stationary sources within the Bay Area that have BAAQMD permits. For each emissions source, BAAQMD provides conservative estimates of cancer risk, non-cancer hazards, and PM_{2.5} concentrations. There are two existing stationary source located within 1,000 feet of the site boundary. The cumulative health risk results, including health risks from the existing stationary source, are summarized during project construction in Table 7.

Table 7: Summary of the Cumulative Health Impacts at the Project Site

Source	Source Type	Distance from Project Site (feet)	Cancer Risk (per million)	Chronic HI	PM _{2.5} Concentration (µg/m ³)
Freeway					
Sonoma Highway	Freeway	44	6.774	0.009	0.08
Local Roads (>10,000 Annual Average Daily Traffic)					
Mission Boulevard	Local Roads	623	1.31	ND	0.033
Montgomery Drive	Local Roads	950	0.96	ND	0.023
Existing Stationary Sources (BAAQMD Facility Number)¹					
G10427	Valero Refining Co SS#7035	412	7.903	0.007	ND
12882	Family Cleaners	819	19.30	0.051	0.000
Cumulative Health Risks					
Cumulative Total with Project Construction			36.167	0.067	0.134
BAAQMD's Cumulative Thresholds of Significance			100	10	0.8
Threshold Exceedance?			No	No	No
Notes: ¹ Assumes emissions remain constant with time ND = no data available Source: Appendix A.					

As noted in Table 7, the cumulative impacts from existing sources of TACs would be less than the BAAQMD's cumulative thresholds of significance at the project site. Thus, cumulative health risk impacts would be less than significant.

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

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

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

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

Two circumstances have the potential to cause odor impacts:

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

Project Construction

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

Project Operation

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations.

As previously discussed, the project is a mixed-use development project that would include a residential apartment building and storage facility and is not expected to produce any offensive odors that would result in odor complaints. During operation of the project, odors would primarily consist of passenger vehicles traveling to and from the site. These occurrences would not produce objectionable odors affecting a substantial number of people; therefore, operational impacts associated with the project's potential to create odors would be less than significant.

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The project does not contain land uses typically associated with emitting objectionable odors. During operation of the project, odors would primarily consist of vehicles traveling to the site. These occurrences would not produce a significant amount of odors; therefore, operational impacts would be less than significant.

Project as a Receptor

The project consists of a mixed-use development and would have the potential to place sensitive receptors (residents) near existing or planned sources of odors.

The project site is not located within the vicinity of agricultural operations (e.g., dairies, feedlots, etc.), landfills, wastewater treatment plants, or refineries. Other than one facility that engages in painting/coating operations, there were no known odor generators within the screening distances shown in the BAAQMD's guidance. A public record request was filed with the BAAQMD to obtain the most recent odor compliant history for the potential odor generator within the vicinity of the project site. Based on the response from the BAAQMD Public Records Section, the potential source of odor had received only one confirmed complaint over the last ten-year period. Therefore, there are no land uses within the screening distances shown in Table 3-3 of the BAAQMD's guidance that have received five or more confirmed complaints per year for any recent three-year period. The project would not place sensitive receptors near an existing or planned source of odor affecting a substantial number of people.

Mitigation Measures

- MM AIR-1** During construction activities, the following air pollution control measures shall be implemented by the project applicant's construction contractor:
- 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 roadways, driveways, and sidewalks shall be paved as soon as possible.
 - Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
 - All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
 - A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Biological Resources <i>Would the project:</i>				
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?	<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, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

Supporting information is provided in Appendix B.

Environmental Evaluation

Would the project:

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

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

Endangered Species Act (ESA) or California Endangered Species Act (CESA); California Species of Special Concern; designated as Fully Protected by California Department of Fish and Wildlife (CDFW); given a status of 1A, 1B, or 2 by California Native Plant Society (CNPS); or designated as special-status by city, county, or other regional planning documents. Federal and State listed threatened and/or endangered species are legally protected under ESA/CESA. The designated special-status species listed by CNPS have no direct legal protection, but require an analysis of the significance of potential impacts under CEQA Guidelines.

Special-status plant and wildlife species typically occur in undeveloped areas. Although it is less likely, it is also possible for them to occur within developed areas. The project site contains characteristics of land that has been developed or disturbed, including disturbed soils, impervious surfaces, and buildings present on-site. Fifteen special-status plant species and six special-status wildlife species were evaluated for their potential to occur on the project site, based on their ecology and regional occurrences within United States Geologic Service (USGS) Santa Rosa, California 7.5-minute quadrangle. Potential impacts occurring to special-status species, if they were found on-site, would likely be significant.

Special-Status Plant Species Potentially Occurring within the Project Site

Fifteen special-status plant species have been recorded with the potential to occur within the project site based on CNDDDB and CNPS database searches, but due to the prior grading and disturbance events, none are expected to occur on-site and no mitigation measures are recommended. A plant's potential to occur on the project site was based on the presence of suitable habitats, soil types, and occurrences recorded by the United States Fish and Wildlife Service (USFWS), CNPS or California Natural Diversity Database (CNDDDB) within the Santa Rosa quadrangle, and field observations made during the August 24, 2018 site survey by FCS biologists. Based on the high level of disturbance and lack of suitable soil types within project boundaries, it was determined that all 15 special-status plant species are considered unlikely to occur on the project site. Many of the listed plants require vernal pools, alkaline soils, or a coastal scrub habitat, all of which are absent at the site. All of the habitat requirements for each individual species and the likelihood that the species will occur within the project boundaries can be found in the special-status species table (Appendix A).

Special-Status Wildlife Species Potentially Occurring within the Project Site

As noted above, six special-status wildlife species were evaluated for their potential to occur on project site. As mentioned above, the habitat requirements for each individual species and the justification of its exclusion from the project site can be found in the special-status species table (Appendix A). Because of the highly urbanized nature of the project site and previous development efforts coupled with an overall lack of suitable habitat, no special-status wildlife species have the potential to occur within the project boundaries. While the burrowing owl (*Athene cunicularia*) does prefer dry, open habitats dominated by annual or perennial grasslands, the high level of disturbance surrounding and within the site likely precludes presence of this species. However, the project site and its adjacent areas contain ornamental trees and vegetation that support potential habitat for bird species protected under the Migratory Bird Treaty Act.

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

Mitigation Measure BIO-1 would reduce impacts to nesting birds and raptors to a less than significant level.

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

No impact. The project site consists entirely of developed land with areas of invasive species and ruderal weedy species of the project site. There are no critical or sensitive habitats found within the project site. Although the project site is adjacent to a riparian habitat, they are separated by a man-made walkway. Any impacts will be less than significant due to the high level of disturbance at and surrounding the site. No further studies or regulatory permitting would be required, as no impacts to any sensitive natural communities are expected from the project design.

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

No impact. The project site does not contain any wetlands or other areas designated as waters of the United States and no further studies or regulatory permitting would be required. Therefore, the project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act.

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

No impact. No wildlife movement corridors are within the project boundaries. The dense development surrounding the project site currently impedes wildlife movement through the site. While the site is adjacent to the Santa Rosa Creek, the development would have to abide by the required setback to the creek and would not therefore impact the movement of species within the creek corridor.

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

Less than significant. As the project proposes to remove several mature trees within the project boundaries, the project will be required to adhere to all policies regarding tree removal and replacement.

The City of Santa Rosa recognizes the aesthetic, environmental, and economic benefits mature trees provide to the citizens of the City. Chapter 17-24, “Trees” of the Santa Rosa City Code (Tree Ordinance) regulates the protection of certain trees on public and private properties within the City limits.

The Tree Ordinance defines a “heritage tree” as any of the following: valley oak (*Quercus lobata*), blue oak (*Quercus douglasii*), or California buckeye (*Aesculus californica*) 19-inches circumference at breast height (measured at 4.5 feet above ground; or 6 inches diameter at breast height [DBH]) or greater; Pacific madrone (*Arbutus menziesii*) 38-inches circumference (12-inches DBH) or greater; coast live oak (*Quercus agrifolia*), black oak (*Quercus kelloggii*), Oregon oak (*Quercus garryana*), canyon live oak (*Quercus chrysolepis*), interior live oak (*Quercus wislizenii*), red alder (*Alnus rubra* [*Alnus oregona*]), or white alder (*Alnus rhombifolia*) 57-inches circumference (18-inches DBH) or greater; or redwood (*Sequoia sempervirens*), bay (*Umbellularia californica*), Douglas fir (*Pseudotsuga menziesii*), or big-leaf maple (*Acer macrophyllum*) 75-inches circumference (24-inches DBH) or greater.

A Tree Permit is generally required for the removal, alteration or relocation of:

- Any “heritage tree”, “protected tree” (i.e. any tree, including a heritage tree, designated to be preserved on an approved development plan or as a condition of approval of a tentative map, a tentative parcel map, or other development approval issued by the City),
- or “street tree” (i.e. any tree having a single trunk circumference greater than 6.25 inches or a diameter greater than 2 inches, a height of more than six feet, and one half or more of its trunk is within a public right of way or within 5 feet of the paved portion of a City street or a public sidewalk), except as exempted in Section 17-24.030 of the Tree Ordinance.

If construction of the project requires the removal of a tree(s) subject to the City of Santa Rosa Tree Ordinance, a tree permit will be required. A certified arborist will be required to conduct a tree assessment previous to development to determine if any of the trees that are proposed for removal will require a permit. To ensure compliance with City of Santa Tree Ordinances, Mitigation Measure BIO-2, requiring the project applicant to conduct an arborist tree survey to demonstrate compliance with the applicable tree removal and replacement requirements or tree protection requirements, is recommended. The implementation of this mitigation measure would reduce impacts to a less than significant level.

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

No impact. The site is located outside of the Santa Rosa Plain Conservation Strategy and outside of any listed habitat conservation plans. As such, no impact will occur from development.

Mitigation Measures

MM BIO-1 Prior to vegetation removal activities that occur during the nesting season (February 15 through August 31), the following avoidance and minimization measures shall be implemented:

- A qualified biologist shall conduct pre-construction surveys for northern harrier, grasshopper sparrow, pallid bat, Townsend’s big-ear bat, and other migratory birds within the construction area, including a 300-foot survey buffer, no more than 3 days prior to the start of ground disturbing activities in the construction area.
- If an active nest is located during pre-construction surveys, USFWS and/or CDFW (as appropriate) shall be notified regarding the status of the nest. Furthermore, construction activities shall be restricted as necessary to avoid disturbance of the nest until it is abandoned or a qualified biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a minimum radius of 300 feet around an active raptor nest and 50-foot radius around an active migratory bird nest) or alteration of the construction schedule.
- A qualified biologist shall delineate the buffer using nest buffer signs, fencing, pin flags, and or flagging tape. The buffer zone shall be maintained around the active nest site(s) until the young have fledged and are foraging independently.

MM BIO-2 Prior to commencement of construction activities, the applicant conduct an arborist tree survey and apply for the necessary permits regrading tree removal. All applicable provisions of the City of Santa Rosa Tree Ordinance, including removal and replacement of street trees (if applicable) and protection of significant or protected native trees during construction (if applicable).

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
5. Cultural and Tribal Cultural Resources <i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>				
e) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

This section describes the existing cultural resources setting and potential effects from project implementation on the project site and its surrounding area. Descriptions and analysis in this section are based on information provided by the California Native American Heritage Commission (NAHC), Northwest Information Center (NWIC), National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), California Historical Landmarks list, California Points of Historical Interest list, California State Historic Resources Inventory, the University of California Museum of Paleontology Database (UCMP), a pedestrian survey of the site conducted by FCS, and a historic Resource Review conducted by Terracon Consultants. All supporting information including non-confidential records search results, NAHC correspondence, historic and paleontological reports and pedestrian survey photographs are provided in Appendix C.

Northwest Information Center

In order to determine the presence or absence of cultural and historical resources within the proposed project area, a records search and literature review was conducted for the project site and a 0.50-mile radius surrounding it on October 22, 2018 at the NWIC, located at Sonoma State University. The purpose of this review was to access existing cultural resource survey reports, archaeological site records, and historic maps and evaluate whether any previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or other resources exist within or near the project area.

Results from the NWIC indicate that ten resources are located within a 0.5-mile radius of the project area, none of which are located within the project site itself. Three of the resources are historic in nature, and the other seven are either prehistoric or combine historic and prehistoric elements. In addition, 47 area-specific survey reports are on file with the NWIC for the 0.5-mile search radius. Of the 47 previous surveys, only one (S-048798) addressed the project area. However, this report was a broad citywide survey of existing cultural resources, so it appears that the site has not been previously surveyed for cultural resources. A records search map identifying the project boundaries, 0.5-mile search radius and non-confidential results from the NWIC can be found in Appendix C-1.

Native American Heritage Commission

On August 15, 2018, FCS sent a request to the NAHC to review its sacred lands file search and to provide a list of Native American Representatives who may be interested in providing additional information on potential Tribal Cultural Resources (TCR's) within the project area. On August 30, 2018, a response was received from the NAHC indicating that no sacred sites were listed as present in the project area. The letter included a list of eight Native American representatives. Letters including a map and project details were sent to each representative for informational purposes on September 10, 2018. On September 19, 2018, FCS received a letter from Sally Peterson, Tribal Vice-Chairwoman of Middletown Rancheria. The letter stated that the Tribe had no specific comments at this time; however, they requested an immediate cessation of work and notification in the event any TCRs are identified within the project area. As of this date, no additional correspondence has been received. Correspondence with the NAHC and Native American representatives may be found in Appendix C-2.

Pedestrian Cultural Resources Survey

FCS Senior Archaeologist Dr. Dana DePietro, RPA conducted a pedestrian survey of the project area for cultural resources on October 23, 2018. The 2.66-acre project site is located at 4332-4374 Sonoma Highway (SR-12) in the eastern portion of the City of Santa Rosa, Sonoma County, California. The project site is bounded by a lumber yard (west), Sonoma Highway (north), the existing Storage Pro (Phase 1) facility (east), and Santa Rosa Creek (south); refer to Exhibit 2.

The survey covered the subject property in its entirety, beginning in the west corner of the project site and moving northeast along the Sonoma Highway, using east-west transects spaced at standard 15-meter intervals. The northwest half of project site is largely developed, and contains four buildings and paved parking areas. The southeast half of the site is vacant and unpaved, and runs along the northern bank of Santa Rosa Creek. Native soils were only observable in the southeast half

of the site, and soil visibility was moderate to poor, ranging from 30 to 40 percent. Soils in sections of poor visibility were intermittently inspected using a hand trowel. Observed soils were largely composed of light brown loam with low clay content, interspersed with small (2 to 3-centimeter) stones primarily composed of schist and basalt.

Survey conditions were documented using digital photographs and field notes. During the survey, Dr. DePietro examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, tool-making debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics). Particular attention was paid to areas in close proximity to Santa Rosa Creek, as areas in close proximity to natural resources have a higher potential for undiscovered cultural resources. No historic or prehistoric cultural resources were found within the project site. Survey photographs may be found in Appendix C-3.

Historic Resources Review

On December 26, 2018, Terracon Consultants completed a Historic Resources Review of the four buildings within the project boundaries, all of which are over 50 years in age and required assessments as potentially significant historic resources under CEQA. The four properties in question are located at 4332, 4344, 4358, and 4374 Sonoma Highway. The buildings at 4332, 4344, and 4358 each were constructed as private residences, though only 4332 is still currently used for housing. The building at 4374 was constructed as a commercial structure, and remains so today. All four buildings remain at their original location, but retain varying levels of integrity. None of the buildings or associated properties was found to possess any historic or architectural significance, and is not eligible for the NRHP or CRHR. As such, they do not constitute historic resources under CEQA, and do not warrant further consideration. A copy of the Historic Resources Review including Department of Parks and Recreation (DPR) recordation forms for each property may be found in Appendix C-5.

Cultural Resources

Would the project:

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

Less than significant impact with mitigation incorporated. The results of the NWIC records search indicate several historic resources have been recorded within 0.5 mile of the project site, however none are located within close proximity to the site itself. Furthermore, the FCS pedestrian survey and Terracon Historic Resources Review failed to reveal any buildings, structures, or other historic-era resources within the project area that meet the eligibility requirements for consideration as historic resources under CEQA. For these reasons, the potential for the proposed project to have an adverse effect on historic resources is considered low.

While unlikely, subsurface construction activities always have the potential to damage or destroy previously undiscovered historic resources. Undiscovered historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Accordingly, implementation of Mitigation Measure CUL-1 will be required to reduce potential impacts to historic resources that may be discovered during project construction. With the incorporation of mitigation, impacts associated with historic resources would be less than significant.

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

Less than significant impact with mitigation incorporated. The records search results from the NWIC indicated that ten recorded resources have been recorded with a 0.5-mile mile radius of the project site, seven of which contained prehistoric archaeological elements. While an intensive pedestrian survey of the project site failed to identify any archaeological resources within the site boundaries, the presence of several nearby resources, coupled with the project's proximity to Santa Rosa Creek and relatively poor visibility of native soils, increases the possibility that undiscovered archaeological resources may be encountered during project implementation. Such resources could consist of but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Accordingly, this is a potentially significant impact. Implementation of Mitigation Measure CUL-1 would ensure that this potential impact is reduced to a less than significant level.

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

Less than significant impact with mitigation incorporated. The NWIC records search results indicated that no records of human remains or formal cemeteries were found for the project site. Additionally, the field survey found no indication of these types of resources onsite. Nonetheless, earthwork activities have the potential to encountered undiscovered human remains or burial sites. Accordingly, Mitigation Measure CUL-2 requires implementation of standard inadvertent discovery procedures in the event human remains are encountered during construction. Implementation of Mitigation Measure CUL-2 would ensure that this potential impact is reduced to a less than significant level.

Tribal Cultural Resources

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

e) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Less than significant impact. A review of the California Register of Historical Resources, local registers of historic resources, a records search conducted at the NWIC, an NAHC sacred lands file

failed to identify any listed TCRs that may be adversely affected by the proposed project. As such, no known eligible or potentially eligible TCRs will be adversely affected by the proposed project.

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

Less than significant impact. On August 30, 2018, a response was received from the NAHC indicating that no sacred sites were listed as present in the project area. On September 10, 2018, letters including a map and project details were sent to Tribal Representatives identified by the NAHC as potentially having interest or information about the project area. On September 19, 2018, FCS received a letter from Sally Peterson, Tribal Vice-Chairwoman of Middletown Rancheria. The letter stated that the Tribe had no specific comments at this time; however, they requested an immediate cessation of work and notification in the event any TCRs are identified within the project area. To date, no additional responses have been received, and the lead agency has not identified additional significant TCRs meeting the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. As such, no known eligible or potentially eligible TCRs will be adversely affected by the proposed project.

Mitigation Measures

- MM CUL-1** A qualified archaeologist who meets the Secretary of Interior’s Professional Qualification Standards for archaeology shall be present during the initial phase of ground clearance and grading in order to check for the inadvertent exposure of cultural materials. This may be followed by regular periodic or “spot-check” archaeological monitoring as needed, but full-time archaeological monitoring is not recommended at this time. 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 should avoid altering the materials until the archaeologist has evaluated the situation. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. 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 Section 15064.5 of the CEQA Guidelines. Any previously undiscovered resources found during construction within the Project Site shall be recorded on appropriate Department of Parks and Recreation (DPR) 523 forms and will be submitted to the City of Santa Rosa, the Northwest Information Center, and the State Historic Preservation Office, as required.
- MM CUL-2** In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94, and Section 5097.98 must be followed. If during

the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

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

Additionally, California Public Resources Code Section 15064.5 requires the following relative to Native American Remains:

When an initial study identifies the existence of, or the probable likelihood of, Native American Remains within a project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code Section 5097.98. The applicant may develop a plan for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American Burials with the appropriate Native Americans as identified by the Native American Heritage Commission.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
6. Energy <i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<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"/>

Environmental Evaluation

Would the project:

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

Less than significant impact. The proposed project would consume energy as part of building operations and transportation activities. Project energy consumption is summarized in Table 8.

Table 8: Project Energy Consumption Estimates

Consumption Activity	Variable	Consumption Rate	Annual Consumption
Building Electricity	175,166 square feet	14.6 kWh/square foot/year	2.56 million kWh
Building Natural Gas	175,166 square feet	37.3 cubic-feet/square foot/year	6.53 million cubic feet
Transportation Fuel	1,212,831 vehicle miles traveled	35.1 miles/gallon	34,554 gallons

Notes:

kWh = kilowatt hour

Building electricity and natural gas consumption rates provided by United States Energy Information Administration

Transportation fuel consumption rate provided by National Highway Traffic Safety Administration

Source: FCS, 2019.

Operation of the proposed project would consume an estimated 2.56 million kilowatt hours of electricity and an estimated 6.53 million cubic feet of natural gas on an annual basis. The proposed project’s buildings would be designed and constructed in accordance with the City latest adopted energy efficiency standards, which are based on the State’s building energy efficiency standards. These are widely regarded as the most advanced energy efficiency standards and compliance would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary.

Project-related vehicle trips would consume an estimated 34,554 gallons of gasoline and diesel annually. The proposed project is located in an urbanized portion of Santa Rosa along Sonoma Highway. As such, it is located on a regional route of travel and, thus, would not require employees, residents, or patrons to make lengthy or circuitous trips to reach the project site. Accordingly, transportation fuel consumption would not be wasteful, inefficient, or unnecessary. Impacts would be less than significant.

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

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

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
7. Geology and Soils <i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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 direct or indirect 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 checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Would the project:

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

No impact. The closest fault to the project site is the Rodger’s Creek Fault located 1.25 miles to the west. The proposed project site is not located within the Alquist-Priolo Earthquake Fault Zone of the Roger’s Creek Fault and there are no active or potentially active faults within the project boundaries. This condition precludes the possibility of the proposed project being exposed to fault rupture. No impact would occur.

- ii) **Strong seismic ground shaking?**

Less than significant impact. The City of Santa Rosa General Plan Figure 12-3 indicates that the project site is located within an area susceptible to violent ground shaking during an earthquake on Rodgers Creek Fault. All project structures would be required to adhere to the latest adopted edition of the California Building Standards Code, which includes seismic design standards. Compliance with seismic design standards would ensure that persons or structures would not be exposed to undue risk of loss, injury, or death from strong ground shaking. As a result, impacts would be less than significant.

- iii) **Seismic-related ground failure, including liquefaction?**

Less than significant impact. The Sonoma County Liquefaction Susceptibility Map indicates that the project site is located within an area designated as a “medium” liquefaction susceptibility risk. All project structures would be required to adhere to the most recent adopted edition of the California Building Standards Code, which includes seismic design standards. Compliance with seismic design standards would ensure that persons or structures would not be exposed to undue risk of loss, injury, or death from strong ground shaking. As a result, impacts would be less than significant.

- iv) **Landslides?**

Less than significant impact. The project site contains flat relief and is not near any significant slopes. City of Santa Rosa General Plan Figure 12-3 indicates that the project site is not located in an area of relatively unstable rock on slopes greater than 15 percent or landslide complex (previous failure). As a result, the project would not expose people or structures to landslide risks and impacts would be less than significant.

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

Less than significant with mitigation incorporated. The proposed project would involve construction activities that would expose soils and potentially result in substantial soil erosion. As discussed in Section 10, Hydrology and Water Quality, the State Water Resources Control Board adopted a National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The project applicant would be required to submit a Storm Water Pollution Prevention Plan (SWPPP) in order to obtain coverage under the Construction General Permit. The purpose of the SWPPP is to identify the sources of sediment and other pollutants that could affect the quality of stormwater discharges and to describe and ensure the implementation of Best Management Practices (BMPs) to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges resulting from construction activity. Implementation of MM HYD-1 would reduce this impact to a level of less than significant.

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

Less than significant impact. All project structures would be required to adhere to the latest adopted edition of the California Building Standards Code, which includes engineering design standards. (For example, building foundations would need to be adequately supported by engineered fill). Compliance with seismic design standards would ensure that persons or structures would not be exposed to undue risk of loss, injury, or death from unstable geologic units or soils. Impacts would be less than significant.

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

Less than significant impact. All project structures would be required to adhere to the latest adopted edition of the California Building Standards Code, which includes engineering design standards. Compliance with seismic design standards would ensure that persons or structures would not be exposed to undue risk of loss, injury, or death from unstable geologic units or soils. Impacts would be less than significant.

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

No impact. The project would be served by the City of Santa Rosa municipal wastewater system and would connect to existing sewer lines. The project would have no impact related to soils capability to support wastewater disposal.

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

Less than significant with mitigation incorporated. On August 24, 2018, consulting paleontologist Kenneth Finger, PhD, performed a records search on the UCMP database for the Storage Pro Phase 2 project. The project lies within the geologic map of McLaughlin et al. (2008) with the surface of the project site consisting mostly of undivided Holocene alluvium (Qhf). The southeastern end of the site is mapped as young Holocene alluvium (Qhf1) and undivided Holocene and Pleistocene alluvium (Qt). The Pleistocene deposits are likely to extend in the subsurface of the Storage Pro site. Also included in the 0.5-mile search are old Holocene fan deposits (Qhf2), Holocene and Pleistocene landslide deposits (Qls), Pliocene fluvial and lacustrine deposits of Humbug Creek (Tgp), and Miocene–Pliocene Sonoma Volcanics (Tsl is tuff; Tsb is andesite, basaltic andesite and basalt; Tsbt is tuff, breccia, and minor flows).

Holocene deposits are too young to be fossiliferous, landslides are disturbed deposits, and andesite and basalt form from lava and therefore are devoid of fossils. All other deposits within the search area are sedimentary or volcanogenic sedimentary and have the potential to yield significant paleontological resources. Records searches were performed on the UCMP database, first for Pleistocene vertebrate and plant localities in Sonoma County and the Santa Rosa quadrangle, then for corresponding specimens. The quadrangle has four late Pleistocene (Rancholabrean) vertebrate localities that yielded four specimens including horse (*Equus*), Harlan's ground sloth (*Glossotherium harlani*), and robust ground sloth (*Glossotherium cf. G. robustus*); it has no plant localities. Elsewhere in the County are six additional vertebrate localities represented by eight additional specimens, including pond turtle (*Clemmys*), longhorned bison (*Bison antiquus*), and American mammoth (*Mammuth americanum*), plus one plant locality that yielded wood, two cones of Monterey pine (*Pinus radiata*), and many cones of douglas fir (*Pseudotsuga (taxifolia) menziesii*). A copy of Dr. Finger's report may be found in Appendix C-4.

Dr. Finger's report concluded that the surface of the project site consists mostly of undivided Holocene alluvium (Qhf) that is too young to be fossiliferous. Potentially fossiliferous Pleistocene deposits are likely to extend in the subsurface of the Storage Pro site, however, making potential for the proposed project to have an adverse effect on paleontological resources moderate.

The project site has supported development for more than 50 years and the upper soil contain non-native fill materials. However, native soil layers exist below the non-native fill layers. It is therefore possible that sub-surface construction activities associated with the proposed project, such as grading and trenching, could result in a significant impact to paleontological resources. Paleontological resources may include, but are not limited to, fossils from mammoths, saber-toothed cats, rodents, reptiles, fish, and birds. Accordingly, implementation of Mitigation Measure GEO-1 will be required to reduce potential impacts to paleontological resources that may be discovered during project construction. With the incorporation of mitigation, impacts associated with paleontological resources would be less than significant.

Mitigation Measures

MM GEO-1 A qualified paleontological monitor should be present during the initial phase of any ground disturbance in native soil layers. Initial observations may be followed by periodic “spot-check” inspections as deemed necessary; however, full-time construction monitoring is not recommended at this time. In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted. The project contractor shall notify a qualified paleontologist to examine the discovery. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If the applicant determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the City of Santa Rosa for review and approval prior to implementation, and the applicant shall adhere to the recommendations in the plan.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
8. Greenhouse Gas Emissions <i>Would the project:</i>				
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 any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

This section is based, in part, GHG emission estimates prepared by FCS. Supporting information is provided in Appendix A.

Would the project:

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

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

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

The 2017 BAAQMD Thresholds contain the following for GHGs:

For land use development projects (including residential, commercial, industrial, and public land uses and facilities), the threshold is compliance with a qualified GHG Reduction Strategy; or annual emissions less than 1,100 metric tons per year of carbon dioxide equivalent (CO₂e); or 4.6 metric tons CO₂e/service population/year (residents + employees).

The estimated annual operational emissions and annualized construction emissions were combined and compared with the BAAQMD’s threshold of 1,100 metric tons (MT) CO₂e per year to determine significance for this criterion.

Construction

The project would emit GHG emissions during construction from the off-road equipment, worker vehicles, and any hauling that may occur. BAAQMD does not presently provide a construction-related GHG emission thresholds, but recommends that construction-generated GHG emissions be quantified and disclosed. BAAQMD also recommends that lead agencies (in this case, the City of Santa Rosa) make a determination of the level of significance of construction-generated GHG emissions in relation to meeting Assembly Bill (AB) 32 GHG reduction goals. Total GHG emissions generated during throughout construction were combined and are presented in Table 9. As shown in Table 9, construction of the project is estimated to generate approximately 501 MT CO₂e over the entire project construction duration. In order to account for the construction emissions, the total emissions generated during construction were amortized based on the life of the development (mixed use—30 years) and added to the operational emissions. The amortized emissions from construction were added to the operational emissions to determine the total emissions of the project. These total project emissions were analyzed against the BAAQMD significance threshold standard of 1,100 MT CO₂e per year in Table 10.

Table 9: Construction Greenhouse Gas Emissions

Construction Activities	On-site MT CO ₂ e per year	Off-site MT CO ₂ e per year	MT CO ₂ e per year
Demolition	22	24	46
Site Preparation	3	0	3
Grading	6	0	6
Building Construction	231	204	435
Paving	8	1	9
Architectural Coating	1	1	2
Total Construction Emissions			501
Amortized over 30 years			17
Notes: MT CO ₂ e = metric tons of carbon dioxide equivalent Source: CalEEMod Output (see Appendix A)			

Operation

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

- **Motor Vehicles:** These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the project site.

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

Operational GHG emissions by source are shown in Table 10. Operational emissions at project buildout were estimated at 856 MT CO₂e per year. The analysis includes construction emissions amortized over the life of the project (30 years). As presented in Table 9, project construction emissions were calculated to be approximately 501 MT CO₂e per year. If annualized over 30 years, construction emissions equal 17 MT CO₂e per year. Assumptions used to estimate operational emissions were consistent with those presented in the Focused Traffic Study for the Storage Pro Phase II Project (W-Trans 2018). Consistent with the Focused Traffic Study for the Storage Pro Phase II Project, the baseline vehicle trips and associated emissions were assumed to be zero. As shown in Table 10, the project would generate a total of approximately 873 MT CO₂e annually.

Table 10: Annual Operational Greenhouse Gas Emissions

Emission Source	Project Total MT CO ₂ e per year
Area	1
Energy	189
Mobile (Vehicles)	522
Waste	69
Water	76
Total Project Operational Emissions	856
Annualized Construction Emissions	17
Total Annual Project Emissions	873
BAAQMD Threshold	1,100
Does project exceed threshold?	No
Notes: MT CO ₂ e = metric tons of carbon dioxide equivalent. Unrounded results used to calculate totals. Source of Emissions: CalEEMod Output (see Appendix A)	

As shown in Table 10, the project’s combined long-term net operational emissions and amortized construction emissions would not exceed the BAAQMD’s threshold of 1,100 MT CO₂e per year. Therefore, the project’s generation of GHG emissions would be less than significant.

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

Less than significant impact. Significance for this impact is determined by project compliance with the City of Santa Rosa Climate Action Plan and project consistency with ARB’s 2017 Climate Change Scoping Plan Update.

Santa Rosa Climate Action Plan

The City of Santa Rosa adopted its Climate Action Plan in June 2012. The Climate Action Plan identifies policies that will achieve the State-recommended GHG reduction target of 15 percent below 2008 levels by the year 2020 and the locally adopted reduction goal of 25 percent below 1990 levels. The Climate Action Plan provides goals, measures, and associated actions, in the topical areas of energy efficiency and conservation, renewable energy, parking and land use management, improved transport options, optimized vehicular travel, waste reduction, recycling and composting, water and wastewater, agriculture and local food, and off-road vehicles and equipment. The Climate Action Plan contains a compliance checklist for new development, which is used to determine compliance with the Climate Action Plan, which is a qualified GHG Reduction Plan according to the BAAQMD’s 2017 guidelines. According to the Climate Action Plan, new development projects are required to implement all mandatory measures identified in the compliance checklist; however, substitutions may be made at the discretion of the Community Development Director. The project would comply with all mandatory measures identified in the compliance checklist, which is included as part of Appendix A of this IS/MND. Therefore, the project would be consistent with the Climate Action Plan.

SB 32 2017 Scoping Plan Update

The 2017 Climate Change Scoping Plan Update addressing the Senate Bill (SB) 32 targets was adopted on December 14, 2017. Table 11 provides an analysis of the project’s consistency with the 2017 Scoping Plan Update measures. As shown in Table 11, none of the measures are applicable to the project.

Table 11: Consistency with SB 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Project Consistency
SB 350 50 percent Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.	Not applicable. This measure would apply to utilities and not to individual development projects. The project would purchase electricity from Sonoma Clean Power, which offers 45 to 100 percent renewable electricity.
SB 350 Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	Not applicable. This measure applies to existing buildings. New structures are required to comply with Building Energy Efficiency Standards that are expected to increase in stringency over time. The project would comply with the applicable Building Energy Efficiency Standards in effect at the time applications for building permits are received.

Table 11 (cont.): Consistency with SB 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Project Consistency
<p>Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.</p>	<p>Not applicable. This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, vehicles accessing the proposed buildings at the project site would benefit from the standards.</p>
<p>Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million Zero Emission Vehicles (ZEVs) on the road by 2030 and increasing numbers of ZEV trucks and buses.</p>	<p>Not applicable. This measure is not applicable to the project; however, vehicles accessing the buildings at the project site would benefit from the increased availability of cleaner technology and fuels.</p>
<p>Sustainable Freight Action Plan The plan’s target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.</p>	<p>Not applicable. The project is a mixed-use development that would not support large truck and freight operations.</p>
<p>Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.</p>	<p>Not applicable. The project would not include major sources of black carbon.</p>
<p>SB 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita vehicle miles traveled.</p>	<p>Not applicable. The project does not include the development of a Regional Transportation Plan.</p>
<p>Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.</p>	<p>Not applicable. The project is not one targeted by the cap-and-trade system regulations, and, therefore, this measure does not apply to the project.</p>
<p>Natural and Working Lands Action Plan. The ARB is working in coordination with several other agencies at the federal, state, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor’s Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California’s natural and working land.</p>	<p>Not applicable. The project is in a built-up urban area and would not be classified as natural or working lands.</p>
<p>Source of ARB 2017 Scoping Plan Update Reduction Measures: ARB 2017.</p>	

As shown in Table 11, implementation of the project would not conflict with the reduction measures proposed in SB 32.

Summary

The project is consistent with the applicable local plans, policies, and regulations and would not conflict with the provisions of the City of Santa Rosa’s Climate Action Plan or SB 32, or any other state or regional plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. Therefore, the project does not conflict with any plans to reduce GHG emissions. The impact would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
9. Hazards and Hazardous Materials <i>Would the project:</i>				
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) 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"/>
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Would the project:

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

Less than significant impact. Project construction and operation would involve the use of small quantities of hazardous substances such as diesel, gasoline, lubricants, pesticides, and fertilizers. These are commonly used substances and compliance with properly handling and storage guidelines

would ensure that the proposed project would not create a significant hazard to the public or the environment. Impacts would be less than significant.

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

Less than significant impact. Project construction and operation would involve the use of small quantities of hazardous substances such as diesel, gasoline, lubricants, pesticides, and fertilizers. These are commonly used substances and compliance with properly handling and storage guidelines would ensure that the proposed project would not create a significant hazard associated with releases into the environment. Impacts would be less than significant.

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

No impact. The nearest school, Herbert Slater Middle School, is located at 3500 Sonoma Avenue, 0.58-mile south of the project site. This condition precludes the possibility of schools within 0.25-mile of the project site being exposed to hazardous emissions or materials. No impact would occur.

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

Less than significant impact. A query of GeoTracker database indicates that the project site is not listed on any databases of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Additionally, Geotracker indicates that there are five sites within 0.5-mile of the project site that are listed on databases of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, all five sites are listed as “Closed,” signifying that they have been remediated to the satisfaction of the agency with oversight. Impacts would be less than significant.

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

No impact. The nearest airport, Sonoma County Airport, is approximately 7.8 miles northwest of the project site. The project site is not within the Sonoma County Airport Influence Area set forth in the Sonoma County Comprehensive Airport Land Use Plan. This distance precludes the possibility of the proposed project creating an aviation safety hazards for people residing or working in the project area. No impact would occur.

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

Less than significant impact. The proposed multi-family uses and storage facility would be served by a driveway connection to SR-12. The storage facility would also have a connection to Storage Pro Phase 1. All drive aisles would meet Fire Code standards for width and turning radii. Furthermore,

the proposed project does not propose any changes to SR-12 that would impair with emergency response or evacuation. Impacts would be less than significant.

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

Less than significant impact. The project site is located within an urbanized portion of the City of Santa Rosa that was not threatened by the 2017 wildfires. The 2017 Tubbs Fire limit was located approximately 1.5 miles to the north of the project site. Although these fires were located close to the project site, the project site is not located in a wildland urban interface zone, or California Department of Forestry and Fire Protection (CAL FIRE) “Very High” or “High” Fire Hazard Zone. Impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
10. Hydrology and Water Quality				
<i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<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 or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Would the project:

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

Less than significant impact with mitigation incorporated. The proposed project has the potential to release water pollutants during both construction and operation that may violate water quality standards.

Construction

Project construction would involve ground-disturbing activities such as grading that have the potential to cause erosion of soils into downstream waterways, which could violate water quality standards. As a result, the project would be required to prepare and implement a SWPPP during construction in accordance with federal and State requirements. The SWPPP would identify structural and non-structural BMPs intended to prevent erosion during construction. In addition, the SWPPP must include a visual monitoring program, a chemical monitoring program for “non-visible” pollutants to be implemented if there is a failure of BMPs. Implementation of MM HYD-1 would ensure these requirements are applied to the project and that the proposed project would not violate any water quality standards established by the Regional Water Quality Control Board (RWQCB). Impacts would be less than significant.

Operation

The proposed project would install a storm drainage system consisting of inlets, underground piping, and a 4,891 square-foot bioretention basin. The storm drainage system would be designed to detain and meter the release of peak runoff in order to avoid inundating downstream waterways and would include stormwater treatment features. As discussed in Impact 10(c) and 10(e), the proposed project would implement BMPs consistent with the City of Santa Rosa Low Impact Development (LID) Manual in order to reduce negative water quality impacts as part of compliance with the City’s NPDES permit. In addition, the project would include native landscape plantings per the Santa Rosa Citywide Creek Master Plan recommendations and bioretention plantings per the City of Santa Rosa recommendations which would further reduce water quality impacts. Implementation of MM HYD-2 would ensure these features are included in the project. Collectively, these features would ensure that the proposed project would not violate any water quality standards. Impacts would be less than significant.

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

Less than significant impact. The proposed project would be served by the Sonoma County Water Agency (SCWA), which supplies drinking water for the City of Santa Rosa. The main source of water for the SCWA is the Russian River and as a result, groundwater would not be used. In addition, no wells would be drilled as part of the project. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. Impacts would be less than significant.

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

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

Less than significant impact. The proposed project would increase impervious surface area of the project site and during construction would alter the drainage pattern potentially resulting in erosion or siltation. However, implementation of MM HYD-1 would ensure a SWPPP is implemented which would prevent sedimentation and erosion during construction. In addition, the proposed project

would install a stormwater drainage system composed of inlets, piping, and a bioretention basin, which would be constructed in order to detain runoff and pollutants. As a result, impacts would be less than significant.

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

Less than significant impact. The proposed project would develop multi-family housing units and a storage facility and would increase impervious surface area of the project site. The project would install a stormwater system composed of inlets, piping, and a bioretention basin. As described in Impact 10(a), this stormwater system would be designed to detain and meter the release of peak runoff in order to avoid inundating downstream waterways. As a result, the proposed project would not alter drainage patterns such that downstream flooding would occur. Impacts would be less than significant.

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

Less than significant impact. The proposed project site contains existing commercial development. Runoff on the project site either ponds on-site or sheet flows into Santa Rosa Creek. The proposed project would install a bioretention area on the southern portion of the project site as well as native landscape plantings, which would capture stormwater and reduce peak flows into Santa Rosa Creek. As described in Impacts 10(a), 10(c), and 10(d) these features would improve the existing stormwater drainage and would ensure the project does not create or contribute runoff that would exceed the capacity of downstream drainage systems or provide substantial source of polluted runoff. As a result, impacts would be less than significant.

(iv) impede or redirect flood flows?

No impact. The Federal Emergency Management Agency (FEMA) flood maps identify areas that are prone to flooding. According to the FEMA Flood Insurance Rate Map (FIRM) Number 06097C0729E the proposed project site is located in Zone X, “Area of Minimal Flood Hazard.” As such, the proposed project would not substantially alter flood flows. No impact would occur.

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

No impact. The project site is not located near the ocean or other large bodies of water, such as San Francisco Bay, that could generate a seiche or tsunami. Mudflows are highly unlikely to occur due to the relatively flat topography of the project site. No impact would occur.

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

Less than significant impact. The proposed project site contains existing commercial development. Runoff on the project site either ponds on-site or sheet flows into Santa Rosa Creek. The proposed project would install a bioretention area on the southern portion of the project site as well as native

landscape plantings which would capture stormwater and reduce peak flows into Santa Rosa Creek. These features would improve the existing stormwater drainage and would ensure the project does not conflict with or obstruct implementation of a water quality control plan. As a result, impacts would be less than significant.

Mitigation Measures

- MM HYD-1** Prior to issuance of demolition permits for the proposed project, the City of Santa Rosa shall verify that the applicant has prepared a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. The SWPPP shall be designed to address the following objectives: (1) all pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled; (2) where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges (e.g., chemicals) are identified and either eliminated, controlled, or treated; (3) site Best Management Practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and (4) stabilization BMPs installed to reduce or eliminate pollutants after construction are completed. The SWPPP shall be prepared by a qualified SWPPP developer. The SWPPP shall include the minimum BMPs required for the identified Risk Level. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site BMPs Manual.
- MM HYD-2** Prior to issuance of building permits for the proposed project, the City of Santa Rosa shall verify that the project applicant has prepared operational stormwater quality control measures that comply with the requirements of the current Municipal Regional Permit. Responsibilities include but are not limited to designing BMPs into project features and operations to reduce potential impacts to surface water quality and to manage changes in the timing and quantity of runoff (i.e., hydromodification) associated with operation of the project. These features shall be included in the design-level drainage plan and final development drawings. Specifically, the final design shall include measures designed to mitigate potential water quality degradation and hydromodification of runoff from all portions of completed developments. Low Impact Development features—including minimizing disturbed areas and impervious cover and then infiltrating, storing, detaining, evapotranspiring, or biotreating stormwater runoff close to its source—shall be used at each development covered by the Municipal Regional Permit. Funding for long-term maintenance of all BMPs must be specified. For each development project, the project sponsor shall establish a self-perpetuating Operation and Maintenance of Stormwater Treatment Systems plan (Municipal Regional Permit provision C.3.h). This plan shall specify a regular inspection schedule of stormwater treatment facilities in accordance with the requirements of the Municipal Regional Permit. Reports documenting inspections and any remedial action conducted shall be submitted regularly to the City for review and approval.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
11. Land Use and Planning <i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Would the project:

a) Physically divide an established community?

No impact. The proposed project would remove the existing structures on-site and develop multi-family dwelling units and a storage facility. The project site does not serve as a linkage between established communities because there are no roads connecting the site to surrounding communities. In addition, the proposed project does not propose development that would physically divide a community, such as an interstate highway. As a result, no impacts would occur.

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

Less than significant impact. The project site is currently designated as “Retail and Business Service” by the City of Santa Rosa General Plan 2035. This General Plan designation allows for retail, offices, and restaurants as well as regional centers of retail and services enterprises. The project site is zoned “CG (General Commercial)” which is intended to provide a range of retail and services uses such as shops, personal businesses, restaurants, and residential uses as part of mixed use projects.

The project proposes 30 multi-family housing units and 1.66 acres of storage units within a 2.66-acre site. The storage portion of the project is consistent with the General Plan and CG designation by providing a storage facility. However, the residential portion of the project would not comply with the current General Plan land use designation. As a result, a MUP would be required by the project to designate the 1.0-acre residential portion of the project site to Medium High Density Residential (30 dwelling units/acre). Section 20-52.050 of the Santa Rosa City Code states that the Minor Conditional Use Permit is intended to provide a process for reviewing land use activities that could be desirable in zoning districts but the effect on the site and surroundings cannot be determined before being proposed. This conditional use permit would be subject to Zoning Administrator approval in order to be consistent with Section 20-52.050. Approval of the Minor Conditional Use Permit would ensure the

project is consistent with the General Plan and Zoning code land use designations. As such, this is a self-mitigating aspect of the proposed project and impacts would be less than significant.

The Santa Rosa Creek is located on the project's southern boundary. Section 20-30.040 (Creekside Development) establishes setbacks from waterways for new structures. The section provides that no development shall be allowed within 50 feet from the top of the highest bank of a waterway with a defined bank, or 50 feet from the established 100-year storm freeboard level of a waterway without a defined bank. Pursuant to Section 20-30.040, the project would maintain the required 50-foot setback. In order to further avoid impacts, the project incorporates a bioretention area and native landscaping along the southern boundary of the project site. Consistent with Section 20-30.040, the project avoids impacts to Santa Rosa Creek and integrates the creek setback into project design. Therefore, impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
12. Mineral Resources <i>Would the project:</i>				
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"/>

Environmental Evaluation

Would the project:

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

No impact. The project site has not supported mineral resource extraction. The Mineral Land Classification Map for Sonoma County has classified the project site in Mineral Resource Zone 3 MRZ-3, defined as an area that mineral deposits, the significance of which cannot be evaluated from available data. Therefore, implementation of the project would not result in the loss of availability of a known resource that would be of value to the region and residents of the State. No impact would occur.

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

No impact. The project site has not supported mineral resource extraction and is not identified as such a site in the Santa Rosa General Plan 2035. As such, the project would not result in the loss of availability of a locally important mineral recovery site. No impact would occur.

Mitigation Measures

None.

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

Supporting information is provided in Appendix D.

Environmental Evaluation

Would the project result in:

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

Less than significant impact with mitigation incorporated. This impact addresses whether the proposed project would cause a temporary or permanent increase in ambient noise levels.

Temporary Increase in Ambient Noise Levels

A significant impact would occur if construction activities would result in a substantial temporary increase in ambient noise levels that would result in annoyance or sleep disturbance of nearby sensitive receptors. Noise impacts from construction activities associated with the project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

Two types of short-term noise impacts would occur during site preparation and project construction. The first type would result from the increase in traffic flow on local streets associated with the transport of workers, equipment, and materials to and from the project site. The transport of workers, construction equipment, and materials to the project site would incrementally increase

noise levels on access roads leading to the site. Because workers and construction equipment would use existing routes, noise from passing trucks would be similar to existing vehicle-generated noise on these local roadways. For this reason, short-term intermittent noise from trucks would be minor when averaged over a longer time-period and would not be expected to exceed existing peak noise levels in the project vicinity. Therefore, short-term construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction noise levels are rarely steady in nature and, often, fluctuate depending on the type and number of equipment being used at any given time. In addition, there could be times where large equipment is not operating and noise would be at or near normal ambient levels. Construction is completed in discrete steps, each of which has its own mix of equipment and its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction related noise ranges to be categorized by work phase.

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

Construction of the proposed project is expected to require the use of scrapers, bulldozers, water trucks, haul trucks, and pickup trucks. The maximum noise level generated by each scraper is assumed to be 85 dBA L_{max} at 50 feet from this equipment. Each bulldozer would also generate 85 dBA L_{max} at 50 feet. The maximum noise level generated by graders is approximately 85 dBA L_{max} at 50 feet. Each doubling of sound sources with equal strength increases the noise level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, a reasonable worst-case combined noise level during this phase of construction would be 90 dBA L_{max} at a distance of 50 feet from the acoustic center of a construction area. This would result in a reasonable worst-case hourly average of 86 dBA L_{eq} . The acoustical center reference is used because construction equipment must operate at some distance from one another on a project site (they cannot all operate simultaneously at a single point), and the combined noise level as measured at a point equidistant from the sources (acoustic center) would be the worst-case maximum noise level.

The closest noise-sensitive receptor to the project site is a single-family residential home located across the Sonoma Highway from the project site. This receptor would be located approximately 180 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would operate simultaneously at the project site. At this distance, worst-case construction noise levels could range up to approximately 78.9 dBA L_{max} , intermittently, and could have an hourly average of up to 74.9 dBA L_{eq} , at the façade of the nearest sensitive receptor.

Although there could be a relatively high single event noise exposure potential causing an intermittent noise nuisance, the effect of construction activities on longer-term (hourly or daily) ambient noise levels would be small but could result in a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. Therefore, noise producing construction activities shall be restricted to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays. No construction shall be permitted on Sundays or on holidays. Thus, restricting construction activities to these stated time-periods, as well as implementing the best management noise reduction techniques and practices outlined in MM NOI-1, would ensure that construction noise would not result in a substantial temporary or periodic increase in ambient noise levels that would result in annoyance or sleep disturbance of nearby sensitive receptors. Therefore, with implementation of MM NOI-1, temporary construction noise impacts would be reduced to less than significant.

Permanent Increase in Ambient Noise Levels

According to the provisions of the Santa Rosa City Code, new projects that would result in an increase in ambient noise levels of more than 5 dBA above existing background noise levels would be considered to have a significant impact. Santa Rosa's City Code 17-16.120 states that "it is unlawful for any person to operate any machinery, equipment, pump, fan, air-conditioning apparatus or similar mechanical device in any manner so as to create any noise, which would cause the noise level at the property line of any property to exceed the ambient base noise level by more than five decibels (+5 dBA)."

Traffic Noise Impacts

A characteristic of noise is that a doubling of sound sources with equal strength is required to result in a perceptible increase (defined to be 3 dBA or greater) in noise levels. The proposed project is expected to generate an average of 445 trips per day, including 29 AM peak-hour trips and 42 trips during the PM. peak-hour. This amount of average daily trips would not double the total traffic volumes along any roadway segment in the project vicinity. Therefore, implementation of the project would not result in even a 3 dBA increase in traffic noise levels on local roadways, and potential project-related traffic noise increases would be well below the 5 dBA increase that would be considered significant. Therefore, project-related traffic noise impacts on off-site receptors would be less than significant.

Stationary Noise Source Impacts

The proposed project would include new stationary noise sources such as parking lot activities and mechanical ventilation system equipment. These would be potential point sources of noise that could affect noise-sensitive receptors in the project vicinity.

Typical parking lot activities, including people conversing, doors shutting, or vehicles idling, generate noise levels of approximately 60 dBA to 70 dBA L_{max} at 50 feet. These activities are expected to occur intermittently throughout the day, as residents, visitors, and staff arrive and leave the parking lot areas. The closest noise-sensitive receptor to the proposed parking areas is a single-family residential home located across the Sonoma Highway from the project site. This receptor is located over 150 feet from the proposed parking areas on the project site. At this distance, noise levels from

parking lot activities would attenuate to below 60 dBA L_{max} at the property line of this residential receptor. As indicated by the long-term ambient noise measurement, maximum noise levels in the project vicinity range up to 71.6 dBA L_{max} . Therefore, noise levels generated by parking lot activities would not exceed existing ambient noise levels by 5 dBA above existing background ambient noise levels. The impact of noise produced by project-related parking lot activities to sensitive off-site receptors would be less than significant.

At the time of preparation of this analysis, details were not available pertaining to proposed mechanical ventilation systems for the project; therefore, a reference noise level for typical mechanical ventilation systems was used. Noise levels from typical residential mechanical ventilation equipment range up to approximately 60 dBA L_{eq} at a distance of 25 feet. Mechanical ventilation systems could be located as close as 160 feet to the nearest off-site sensitive receptor, the single-family residential home located across the Sonoma Highway from the project site. At this distance, noise generated by mechanical ventilation equipment would attenuate to approximately 44 dBA L_{eq} at the nearest off-site residential receptor. As indicated by the ambient noise monitoring data, measured ambient noise levels in the project vicinity range up to 66.6 dBA L_{eq} during the day, and up to 46.4 dBA L_{eq} during the night. Therefore, mechanical ventilation equipment operational noise levels would not exceed existing ambient noise levels by 5 dBA at any property lines adjacent to the site. The impact of mechanical ventilation equipment operational noise levels to sensitive off-site receptors would be less than significant.

Therefore, operational noise levels generated by stationary noise sources at the proposed project site would not result in a substantial permanent increase in ambient noise levels in the project vicinity and would have a less than significant impact on noise-sensitive receptors in the project vicinity.

Adopted Noise Standards

A significant impact would occur if project residents and employees would be exposed to noise levels in excess of the City's "normally compatible" land use compatibility threshold of 65 dBA L_{dn} for multi-family residential land uses or if project residents and employees would be exposed to interior noise levels that would exceed the City's interior noise standard of 45 dBA L_{dn} .

The existing noise environment on the project site was documented through a noise monitoring effort. The noise monitoring survey data sheets are provided in Appendix D. Two short-term ambient noise measurements (15 minutes each) were conducted on the project site on Tuesday, September 4, 2018, starting at 2:40 p.m. and ending at 3:19 p.m. One long-term ambient noise measurement (24 hours) was also conducted on the project site, starting at 4:46 p.m. on Tuesday, September 4, 2018, and ending at 5:12 p.m. on Wednesday, September 5, 2018.

The first short-term measurement, ST-1, was conducted on the northern corner of the project site, 50 feet from the center of Sonoma Highway and 20 feet from 4358 Sonoma Highway, next to an existing parking lot on the project site. The resulting measurement showed that ambient noise levels at this location averaged 66.6 dBA L_{eq} . As was observed by the technician at the time of the noise measurement, the dominant noise source in the project vicinity was from vehicular traffic along Sonoma Highway.

The second short-term measurement, ST-2, was conducted on the southwestern portion of the project site, 150 feet from the existing buildings on the northwest portion of the project site. The resulting measurement showed that ambient noise levels at this location averaged 50.0 dBA L_{eq} . As was observed by the technician at the time of the noise measurement, the dominant noise sources in the project vicinity were vehicular traffic along Sonoma Highway and nearby mechanical equipment operations.

The long-term measurement, LT-1, was conducted on the northeastern boundary of the project site, approximately 170 feet south of Sonoma Highway. The resulting measurement showed that ambient noise levels at this location averaged 59.1 dBA L_{dn} . As was observed by the technician at the time of the noise measurement, the dominant noise sources in the project vicinity were fans from the adjacent Storage Pro facility to the east and vehicular traffic along Sonoma Highway.

The long-term measurement of 59.1 dBA L_{dn} is within the City's "normally compatible" land use compatibility threshold of 65 dBA L_{dn} for multi-family residential land uses. Additionally, with standard construction, interior noise levels of the nearest proposed residential units would meet the interior noise standard of 45 dBA L_{dn} . Therefore, project implementation would not expose persons working or residing at the project site to noise levels in excess of established standards, and this impact would be less than significant.

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

The City of Santa Rosa and the State of California have not adopted criteria or regulations for groundborne vibration or groundborne noise. Therefore, for purposes of this analysis, the Federal Transit Administration's vibration-related damage threshold of 0.5 inch/second peak particle velocity (PPV) is utilized.

Short-term Construction Vibration Impacts

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

Multiple structures are located within 25-feet of the project property line; each of these closest buildings are of reinforced-concrete and steel or timber construction. The closest of these off-site structures to the proposed construction areas is a commercial storage/office building that is located adjacent to the northeast property line of the project site, fronting Sonoma Highway. The facade of this building would be located approximately 10 feet from the nearest proposed construction footprint where heavy equipment would operate. At this distance, groundborne vibration levels would range up to 0.399 in/sec PPV from the operation of a small vibratory roller. This is below the Federal Transit Administration (FTA) damage threshold criteria of 0.5 in/sec PPV for this type of structure (a building of reinforced-concrete and steel construction). Calculated vibration levels from construction activity as measured at all other structures bordering the project site can be similarly shown to be below the FTA

damage threshold criteria for each structure. Therefore, the impact of short-term groundborne vibration associated with construction to off-site receptors would be less than significant.

Operational Vibration Impacts

Less than significant impact. Implementation of the project would not include any permanent sources of vibration that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the vicinity of the project site. In addition, there are no existing significant permanent sources of groundborne vibration in the vicinity of the site to which the proposed project would be exposed. The nearest proposed façade is located more than 40 feet from the closest travel lane on Sonoma Highway. This distance is sufficient to attenuate any vibration from transportation sources to levels that would not be perceptible without instruments within the structure. Therefore, project operational groundborne vibration level impacts would be considered less than significant.

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

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

Mitigation Measures

- MM NOI-1** To reduce potential construction noise impacts, the following multi-part mitigation measure shall be implemented for the project:
- The construction contractor shall ensure that all internal combustion engine-driven equipment is equipped with mufflers that are in good condition and appropriate for the equipment.
 - The construction contractor shall locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project area. In addition, the project contractor shall place such stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site.
 - The construction contractor shall prohibit unnecessary idling of internal combustion engines.
 - The construction contractor shall, to the maximum extent practical, locate on-site equipment staging areas so as to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.

- The construction contractor shall limit noise producing construction activity, including deliveries and equipment idling, to the daytime hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays. No construction is permitted on Sundays or on holidays.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
14. Population and Housing <i>Would the project:</i>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Would the project:

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

Less than significant impact. The proposed project would develop 30 multi-family dwelling units and a storage facility on a site that is currently developed. The California Department of Finance estimates the City of Santa Rosa has a population of 178,488 and an average household size of 2.68 as of January 1, 2018. Multiplying the average household size of 2.68 by 30 dwelling units yields an estimated population of 81 persons. This project’s population growth would represent 0.04 percent of the existing population of Santa Rosa and, thus, would not represent a substantial increase.

The project site is located within the Santa Rosa city limits and is surrounded by urban development. As such, there is already infrastructure in place to serve future land uses and the project would not constitute the removal of a physical barrier to growth. As a result, impacts would be less than significant.

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

Less than significant impact. The project site contains several single-family residences that have been repurposed for commercial use. Thus, these buildings are not used for housing and their removal would not result in the displacements of residents such that replacement housing would be required to be constructed elsewhere. Impacts would be less than significant.

Mitigation Measures

None.

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

Environmental Evaluation

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

a) Fire protection?

Less than significant impact. The Santa Rosa Fire Department currently provides and would continue to provide fire protection services to the project site. The closest fire station to the project site is Fire Station No. 6 located approximately 1.4 miles to the northeast of the project site. Using an average travel speed of 25 miles per hour, it would take an engine 3 minutes 22 seconds to reach to the project site from Fire Station No. 6, which would be an acceptable emergency response time. Additionally, the proposed project would comply with all applicable fire prevention and emergency access provisions set forth in the California Building Standards Code. Overall, the project would be expected to result in a *de minimis* impact on fire protection and, thus, new or expanded police facilities would not be required. Impacts would be less than significant.

b) Police protection?

Less than significant impact. The Santa Rosa Police Department currently provides and would continue to provide police protection services to the project site. The project consists of the development of 30 apartments and a storage facility on an infill site within the City limits. The apartments would be located along the Sonoma Highway frontage and would have lighted common spaces (e.g., parking areas, walkways, stairwells, etc.). The proposed storage would provide security measures such as fencing and lighting. Overall, these measures would serve to deter and prevent

criminal activity and the proposed project would be expected to result in a *de minimis* impact on police protection and, thus, new or expanded police facilities would not be required. Impacts would be less than significant.

c) Schools?

Less than significant impact. The project site is within the boundaries of the Rincon Valley Union School District (K-6) and the Santa Rosa City Schools District (7-12). The proposed storage facilities would be non-residential in nature and not directly generate new enrollment in the School District. The 30 apartment units would directly generate new enrollment in the School District. Using a standard student generation rate of 0.5 student per household, the proposed project would generate 15 students that would enroll in K-12 schools. This amount of enrollment growth would not be substantial enough to directly result in the need for new or expanded school facilities. Moreover, the proposed project would provide development fees to each school district at the time building permits are sought. Pursuant to Government Code Section 65995, payment of development fees is “full and complete” mitigation for school impacts. Impacts would be less than significant.

d) Parks?

Less than significant impact. The proposed project would result in approximately 81 new residents, which would increase demand for park facilities. There are a number of existing park and recreational facilities within the project vicinity including the 4th and Farmers Creek Trail, Howarth Park, Spring Lake Park, and Brush Creek Park. These park and recreational facilities are capable of accommodating additional demand created by the proposed project.

The Santa Rosa General Plan sets a park standard of 3.5 acres of neighborhood and community parks per 1,000 residents. According to the Santa Rosa General Plan Environmental Impact Report (EIR), the City will achieve a park standard of 3.7 acres of park per 1,000 residents. Based on the General Plan’s standard of 3.5 acres of parks per 1,000 residents, the project would create a need for 0.28 acre of new parkland. No new or expanded park facilities would be directly constructed to satisfy the project’s parkland obligation. Instead, the proposed project would pay development fees to fund capital improvements to park and recreational facilities. For these reasons, the proposed project does not directly create a need to construct new or expanded park or recreational facilities. Impacts would be less than significant.

e) Other public facilities?

Less than significant impact. The proposed project would result in approximately 81 new residents, which would increase demand for other public facilities, such as libraries. The Sonoma County Central Library is the closest library to the project site located approximately 2.16 miles to the west. This amount of population growth would not be substantial enough to directly result in the need for new or expanded library facilities. Moreover, the proposed project would pay development fees to fund capital improvements to park and recreational facilities. For these reasons, the proposed project does not directly create a need to construct new or expanded library facilities. Impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

Environmental Evaluation

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Less than significant impact. The proposed project would result in approximately 81 new residents, which would increase demand for regional park and recreational facilities. A portion of the 4th and Farmers Creek Trail is located just south of the project’s southern boundary along the Santa Rosa Creek. The Santa Rosa General Plan sets a park standard of 3.5 acres of neighborhood and community parks per 1,000 residents. According to the Santa Rosa General Plan EIR, the City will achieve a park standard of 3.7 acres of park per 1,000 residents. As a result, project impacts to existing neighborhood and regional parks and recreational facilities would be less than significant.

- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

Less than significant impact. The proposed project would not include recreational facilities. As discussed previously, the project would not require the construction or expansion of park or recreational facilities. As such, impacts would be less than significant.

Mitigation Measures

None.

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

Supporting information is provided in Appendix E.

Environmental Evaluation

Would the project:

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

Less than significant impact. Table 12 summarizes the trip generation of the proposed project. As shown in Table 12, the proposed project would generate 445 daily trips, 29 AM peak-hour trips, and 42 PM peak-hour trips. Note that the values shown in Table 12 do not “net out” trips from the existing land use activities and, therefore, represent a conservative estimate of project trip generation.

Table 12: Trip Generation Summary

Land Use	Daily	AM Peak Hour	PM Peak Hour
Mini-Warehouse	225	15	25
Multifamily Housing	220	14	17
Total	445	29	42

Source: W-Trans, 2018

The City of Santa Rosa’s traffic study guidelines indicate that projects that generate fewer than 50 peak-hour trips do not need to evaluate intersection operations. As such, the proposed project would have a *de minimis* impact in this regard. Impacts would be less than significant.

Congestion Management Program

Sonoma Highway is a Congestion Management Program facility. As indicated in Table 12, the proposed project would generate 29 AM peak-hour trips and 42 PM peak-hour trips. Because the proposed project would generate less than 50 peak-hour trips, it would not have the potential to cause a significant impact to a Congestion Management Program facility. As such, the proposed project would have a *de minimis* impact in this regard. Impacts would be less than significant.

Public Transit, Bicycles, and Pedestrians

The segment of Sonoma Highway adjacent to the project site is unimproved and lacks sidewalk and bicycle facilities. CityBus provides public transportation service in the City of Santa Rosa with the closest bus stop is located at Sonoma Highway/Mission Boulevard, 800 feet to the east. The proposed multi-family dwelling units would add 81 new residents to the project site and, thus, have the potential for increased use of transit, bicycle, and pedestrian facilities. The proposed project would improve the project frontage with Sonoma Highway to provide pedestrian facilities. Additionally, the apartments would allow for the private storage of bicycles. As a result, the project would not conflict with adopted policies, plans, or programs regarding public transport, bicycle, or pedestrian facilities.

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

Less than significant impact. As indicated in Table 12, the proposed project would generate 29 AM peak hour trips and 42 PM peak hour trips. Because the proposed project would generate less than 50 peak hour trips, it would not have the potential to cause a substantial increase in vehicle miles traveled. As such, the proposed project would have a *de minimis* impact in this regard. Impacts would be less than significant.

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

Less than significant impact. W-Trans evaluated the adequacy of site access and sight distance at the project driveway on Sonoma Highway. The posted speed limit on this stretch of roadway is 55 miles per hour. W-Trans determined that there are clear sight lines extending 540 feet to the west, which is sufficient to allow safe turning movements in and out of the driveway. W-Trans concluded that safe ingress and egress would be provided at this location. As such, the proposed project would not create roadway safety hazards. Impacts would be less than significant.

d) Result in inadequate emergency access?

No impact. The proposed multi-family uses and storage facility would be served by a driveway connection to SR-12. The storage facility would also have a connection to Storage Pro Phase 1. All drive aisles would meet Fire Code standards for width and turning radii. Furthermore, the proposed project does not propose any changes to SR-12 that would impair with emergency access. Impacts would be less than significant. No impact would occur.

Mitigation Measures

None.

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

Environmental Evaluation

Would the project:

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

Less than significant impact. The project site would be served with potable water by the City of Santa Rosa. The City of Santa Rosa 2015 Urban Water Management Plan (UWMP) determined that the quality of surface water and groundwater supply sources will continue to meet State and federal regulatory standards over the next 25 years, and the City does not foresee the need to construct new potable water treatment facilities.

Wastewater from the project would be conveyed to the Laguna Treatment Plant for treatment and disposal consistent with standards established by the North Coast RWQCB. Wastewater from the project would consist mostly of effluent typical of residential units and as such would not substantially increase pollutant levels in the wastewater or exceed the North Coast RWQCB standards. In addition, the project does not propose any industrial or commercial use where pollutant levels or wastewater volumes are typically high.

No new or expanded water or wastewater treatment facilities are necessary to serve the proposed project. Impacts would be less than significant.

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

Less than significant impact. The City of Santa Rosa currently serves the project site with potable water service. Table 13 summarizes the proposed project’s water demand. As shown in the table, the proposed project would demand 5,350 gallons on a daily basis and 6.06 acre-feet on an annual basis. Note that Table 13 does not “net out” existing water use and, therefore, provides a conservative estimate of water demand.

Table 13: Project Water Demand Estimate

Land Use Type	Count	Water Demand Rate	Water Demand	
			Daily (gallons)	Annual (acre-feet)
Apartments	30 units	145 gallons/unit/day	4,350	4.87
Storage	149,000	1,000 gallons/day	1,000	1.19
Total	—	—	5,350	6.06

Notes:
Residential water use rate obtained from City of Santa Rosa Water Master Plan Update, Table 2-12
1 acre-foot = 325,851 gallons
Source: FCS, 2019.

The 2015 UWMP projects that total potable water demand in the City of Santa Rosa will be 24,149-acre-feet in 2020 and 28,140 acre-feet in 2040. The UWMP indicates that potable water supplies will total 31,400-acre-feet in both 2020 and 2040. The project’s demand is accounted for in these numbers because it is an existing developed site currently served with potable water service by the City of Santa Rosa. Moreover, the project’s annual demand of 6.06-acre-feet represents less than 0.001 percent of total Citywide potable water demand in both 2020 and 2040. Therefore, adequate water supply existing to serve the project and new water entitlements would not be required. Impacts would be less than significant.

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

Less than significant impact. Table 14 provides an estimate of project wastewater generation. As shown in the table, the proposed project would generate 4,450 gallons of effluent per day (0.005 million gallons per day (mgd)). The Laguna Treatment Plant is a tertiary level treatment facility that has an average daily dry weather flow of 17.5 mgd and is permitted for a maximum average daily dry weather flow of 21.34 mgd. As a result, the project represents less than 1 percent of the average daily dry weather flow and permitted capacity and the treatment plant would contain sufficient capacity to serve the project. As such, the project would not create a need for new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant.

Table 14: Project Wastewater Generation Estimate

Land Use Type	Count	Water Demand Rate	Population	Daily Wastewater Generation (Gallons)
Apartments	30 units	50 gallons/capita/day	81 residents	4,050
Storage	149,000	400 gallons/day	—	400
Total	—	—	—	4,450 (0.005 mgd)
Note: Wastewater generation rate obtained from City of Santa Rosa Sanitary Sewer System Master Plan Update Source: FCS, 2019.				

As a result, the project represents less than one percent of the average daily dry weather flow and permitted capacity and the treatment plant would contain sufficient capacity to serve the project. As such, the project would not create a need for new or expanded wastewater treatment facilities.

The proposed project would discharge effluent into the existing 15-inch diameter Los Alamos Sewer Trunk located in the southern portion of the project site. The existing sewer trunk has capacity to serve the proposed project’s effluent.

The City of Santa Rosa plans to implement the Los Alamos Sewer Trunk Replacement Project (C01903) that would upsize the existing 15-inch diameter sewer line to a 24-inch diameter sewer line. The site plan reserves room for and avoids encroachment into this future 20-foot wide easement. The sewer trunk replacement project is independent of the proposed project and is subject to separate environmental review. The proposed project would discharge effluent into the upsized sewer main once operational.

Therefore, impacts would be less than significant.

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

Less than significant impact. Solid waste from Santa Rosa is landfilled at the Redwood Sanitary Landfill near Novato, which has 19 million cubic yards of remaining capacity. CalRecycle provides a standard residential solid waste generation rate of 12.23 pounds per household per day. Applying this rate to the 30 dwelling units yields 367 pounds of solid waste per day. The storage facility is estimated to generate 20 pounds of solid waste per day. In total, the project would generate 397 pounds per day or 72 tons per year (101 cubic yards). The amount of solid waste represents less than 0.001 percent of the remaining capacity of the Redwood Sanitary Landfill. As such, adequate landfill capacity exists to serve the project and the project does not create a need for new or expanded landfill capacity. Impacts would be less than significant.

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

Less than significant impact. The proposed project would be served with recycling services. This would allow for recyclable materials to be diverted from the in waste stream in accordance with state and local objectives concerning waste reduction and recycling. As such, the project would comply with applicable statutes associated with solid waste. Impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
19. Wildfire <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>				
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"/>

Environmental Evaluation

Would the project:

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

No impact. The proposed multi-family uses and storage facility would be served by a driveway connection to SR-12. The storage facility would also have a connection to Storage Pro Phase 1. All drive aisles would meet Fire Code standards for width and turning radii. Furthermore, the proposed project does not propose any changes to SR-12 that would impair with emergency response or evacuation during a wildfire. Impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No impact. The project site is located within an urbanized portion of the City of Santa Rosa that was not threatened by the 2017 wildfires. The 2017 Tubbs Fire limit was located approximately 1.5 miles to the north of the project site. Although these fires were located close to the project site, the project site is not located in a wildland urban interface zone, CAL FIRE “Very High” or “High” Fire Hazard Zone. No impact would occur.

- c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

No impact. The project site is located within an urbanized portion of the City of Santa Rosa that was not threatened by the 2017 wildfires. No roads, fuel breaks, emergency water sources, power lines, or other utilities would be installed for the purposes of fighting wildfires. No impact would occur.

- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

No impact. The project site is located within an urbanized portion of the City of Santa Rosa that was not threatened by the 2017 wildfires. The project site is not susceptible to post-fire landslides, flooding, or slope instability. No impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
20. Mandatory Findings of Significance				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

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

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

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

Less than significant impact. All cumulative impacts related to air quality, noise, and traffic are either less than significant after mitigation or less than significant and do not require mitigation. Given the scope of the project and its impacts and mitigation measures, the incremental effects of this project are not considerable relative to the effects of past, current, and probably future projects. As discussed previously, the project does not have a significant cumulative traffic impact. Therefore, the proposed project would not result in cumulatively considerable impacts on these areas. Impacts would be less than significant.

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

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

Mitigation Measures

Implement Mitigation Measures BIO-1, BIO-2, CUL-1, and CUL-2.

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