



Proposed Mitigated Negative Declaration

Sonoma County Permit and Resource Management Department
(Permit Sonoma)

2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-1900 FAX (707) 565-1103

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Prepared by: Katrina Braehmer
Phone: (707) 565-1903

Pursuant to Section 15071 of the State CEQA Guidelines, this proposed Mitigated Negative Declaration and the attached Initial Study, including the identified mitigation measures and monitoring program, constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

Project Name: NeilMed Warehouse
Project Applicant/Operator: Ken DiLillo
Project Location/Address: 685 Aviation Boulevard, Santa Rosa
APN: 059-340-056
General Plan Land Use Designation: LI
Zoning Designation: MP 1 AC AVG, VOH
Decision Making Body: Sonoma County Design Review Committee
Appeal Body: Sonoma County Planning Commission
Project Description: See below

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" or "Less than Significant with Mitigation" as indicated in the attached Initial Study and in the summary table below.

Table 1. Summary of Topic Areas

Topic Area	Abbreviation	Yes	No
Aesthetics	VIS		X
Agricultural & Forest Resources	AG		X
Air Quality	AIR	X	
Biological Resources	BIO	X	
Cultural Resources	CUL	X	
Energy	ENE		X
Geology and Soils	GEO		X

Greenhouse Gas Emission	GHG	X	
Hazards and Hazardous Materials	HAZ		X
Hydrology and Water Quality	HYDRO		X
Land Use and Planning	LU		X
Mineral Resources	MIN		X
Noise	NOISE	X	
Population and Housing	POP		X
Public Services	PS		X
Recreation	REC		X
Transportation	TRAF		X
Tribal Cultural Resources	TCR		X
Utility and Service Systems	UTL		X
Wildfire	WILD		X
Mandatory Findings of Significance			X

RESPONSIBLE AND TRUSTEE AGENCIES

The following lists other public agencies whose approval is required for the project, or who have jurisdiction over resources potentially affected by the project.

Table 2. Responsible and Trustee Agencies

Table 2. Agency	Activity	Authorization
Sonoma County Permit and Resource Management Department (Permit Sonoma)	Requires that grading, septic and building permits be obtained for development of this site	
Bay Area Air Quality Management District (BAAQMD)	Stationary air emissions	BAAQMD Rules and Regulations (Regulation 2, Rule 1 – General Requirements; Regulation 2, Rule 2 – New Source Review; Regulation 9 – Rule 8 – NOx and CO from Stationary Internal Combustion Engines; and other BAAQMD administered Statewide Air Toxics Control Measures (ATCM) for stationary diesel engines
California Department of Fish and Wildlife	Impacts to species or habitat	California Endangered Species Act; Sections of the California Fish and Game Code related to Fully Protected Species, nongame mammals, nesting birds, and California Species of Special Concern
U. S. Fish and Wildlife Service (FWS) and or National Marine Fisheries Service (NMFS)	Impacts to species or habitat	Endangered Species Act

ENVIRONMENTAL FINDING:

Based on the evaluation in the attached Initial Study, I find that the project described above will not have a significant adverse impact on the environment, provided that the mitigation measures identified in the Initial Study are incorporated as conditions of approval for the project, and a Mitigated Negative Declaration has been prepared. The applicant has agreed in writing to incorporate identified mitigation measure into the project plans.



Prepared by: Katrina Braehmer

Date: February 24, 2021



Expanded Initial Study

Sonoma County Permit and Resource Management Department (Permit Sonoma)

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I. INTRODUCTION

Ken Di Lillo, on behalf of the property owner Alisha and Natasha Properties, LLC, proposes a new 59,066 square foot warehouse building with 500 square of office space on a 1.53 acre parcel located in the Airport Business Park in north Santa Rosa. A referral letter was sent to the appropriate local, state and federal agencies and interest groups who may wish to comment on the project.

This report is the Initial Study required by the California Environmental Quality Act (CEQA). The report was prepared by Katrina Braehmer, Project Review Planner with the Sonoma County Permit and Resource Management Department (Permit Sonoma), Project Review Division. Information on the project was provided by Ken Di Lillo (applicant), Del Starrett (architect), and Patrick Imbimbo. Technical studies provided by qualified consultants are attached to this Expanded Initial Study to support the conclusions. Other reports, documents, maps and studies referred to in this document are available for review at the Permit and Resource Management Department (Permit Sonoma) or at <https://share.sonoma-county.org/link/mnvf9w9r4J4/>.

Please contact Katrina Braehmer, Project Planner, at (707) 565-1903 for more information.

II. PROJECT DESCRIPTION

Ken Di Lillo proposes to develop a new two-story, 59,066 square foot warehouse for dry-goods, with two truck loading docks on a 1.53-acre parcel. Other site improvements include paved parking and circulation areas, landscaping, and site lighting. The purpose of the project is to supplement existing warehouse buildings on adjacent properties under the same ownership. Water supply will be provided by the Town of Windsor and the warehouse will connect to the Airport/Larkfield/Wikiup Sanitation District (Sonoma Water) for domestic wastewater service. The warehouse will not contain drains and there will be no industrial wastewater. Access is secured from Aviation Boulevard by easement through the properties to the south and the east of the site, although truck ingress/egress will be from existing driveway that serves 601 Aviation Boulevard. Twenty employees are anticipated for warehouse operations, which will occur on weekdays from 5:00 am to 12:00 am.

The 50-foot tall warehouse is proposed to have precast concrete panels for the exterior walls, with the east elevation comprising the central entry and second-story observation balcony. The two stories are served by two stairwells, a freight elevator, and a passenger elevator. The two recessed loading docks will be on the north side of the building, and three other surface level loading doors are provided. The final parking configuration will include 43 spaces onsite, with 14 dedicated to the office building south of the site. Two stalls will have electric vehicle charging stations, three will be reserved for clean air or vanpool vehicles, and two will be ADA-compliant. Landscaping will be installed at the western and northern perimeter of the parcel and along the eastern and southern edges of the building.

III. SETTING

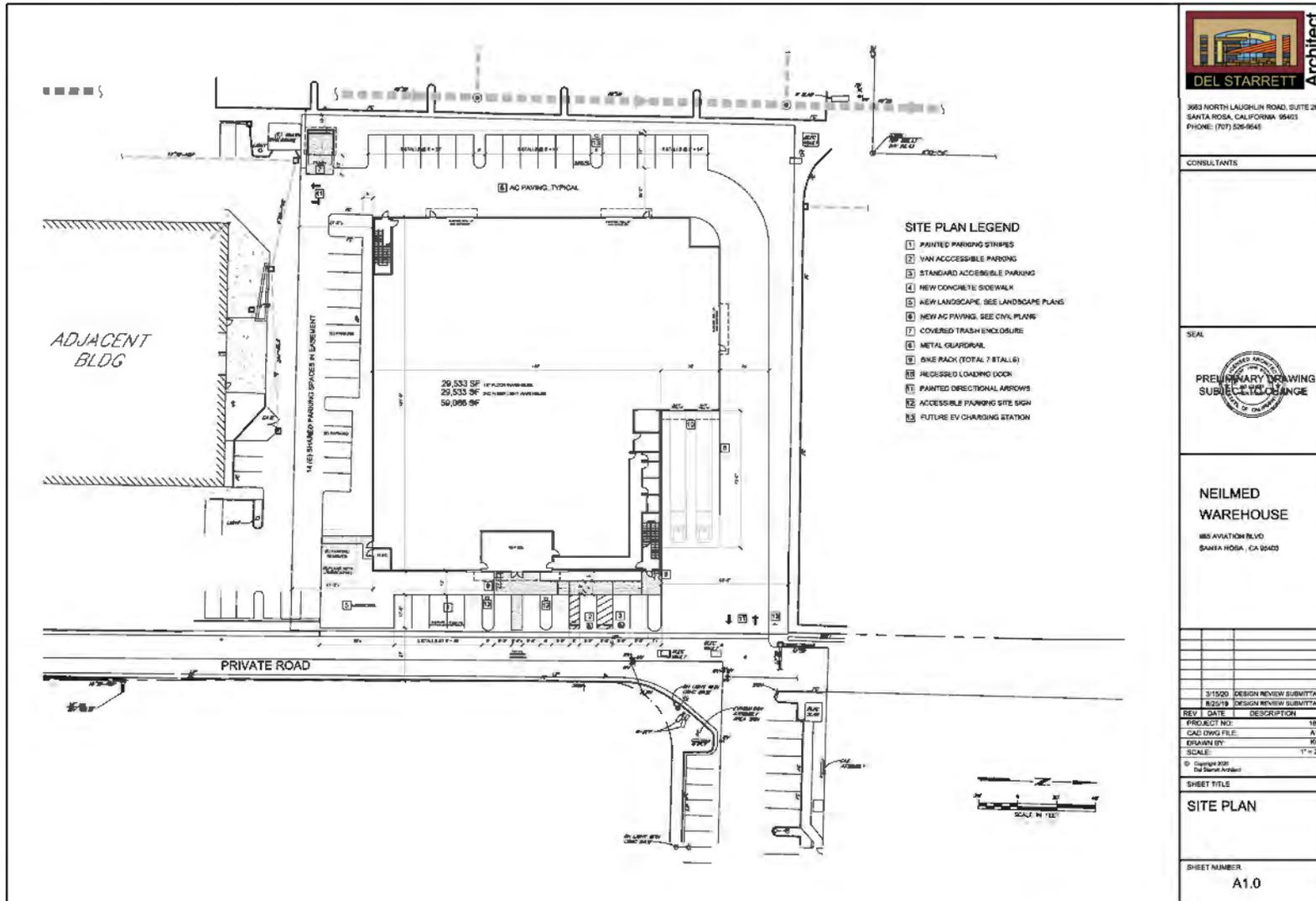
The project site is located in the Airport Business Park in north Santa Rosa, approximately 2.75 miles

from the City of Santa Rosa limits and just west of the Charles M. Schulz Sonoma County Airport. The Airport Business Park is zoned MP (Industrial Park) and surrounding land uses are a mix of light manufacturing and warehousing, and commercial offices. The General Plan Land Use Designation of the parcel and surrounding area is Limited Industrial. Skylane Boulevard and Airport Boulevard have Class II bikeways. The business park is subject to the Airport Industrial Specific Plan.

The site is generally flat at approximately 110 feet above sea level. Soils at the site are mapped as Huichica loam and vegetation is primarily disturbed California annual grassland. Discernible species on the site on November 12, 2019 were harding grass (*Phalaris aquatica*), riggut grass (*Bromus diandrus*), slender wild oat (*Avena barbata*), and soft chess (*Bromus hordeaceus*). Common non-native forbs include bindweed (*Convolvulus arvensis*), bristly ox-tongue (*Helminthotheca echioides*), English plantain (*Plantago lanceolata*), radish (*Raphanus sativus*), rough cat's-ear (*Hypochaeris radicata*), and vetch (*Vicia sativa*). There were patches of Himalayan blackberry (*Rubus armeniacus*) along the perimeter of the site as well as emergent coast live oak trees (*Quercus agrifolia*) and ornamentals including Chinese pistache (*Pistacia chinensis*) and thorny olive (*Elaeagnus pungens*). In the northern portion of the project site a depression was observed with some hydrophytic vegetation, but the sample point did not meet any of the wetland indicators. Further discussion of wetlands can be found in the biological resources section. The site is located within the Santa Rosa Plain Conservation Area.

Figure 2 shows the project vicinity and Figure 3 provides an aerial view of the project and surrounding area.

Figure 1. Site Plan



CONSULTANTS



**NEILMED
 WAREHOUSE**

185 AVIATION BLVD
 SANTA ROSA, CA 95403

Figure 2. Project Vicinity

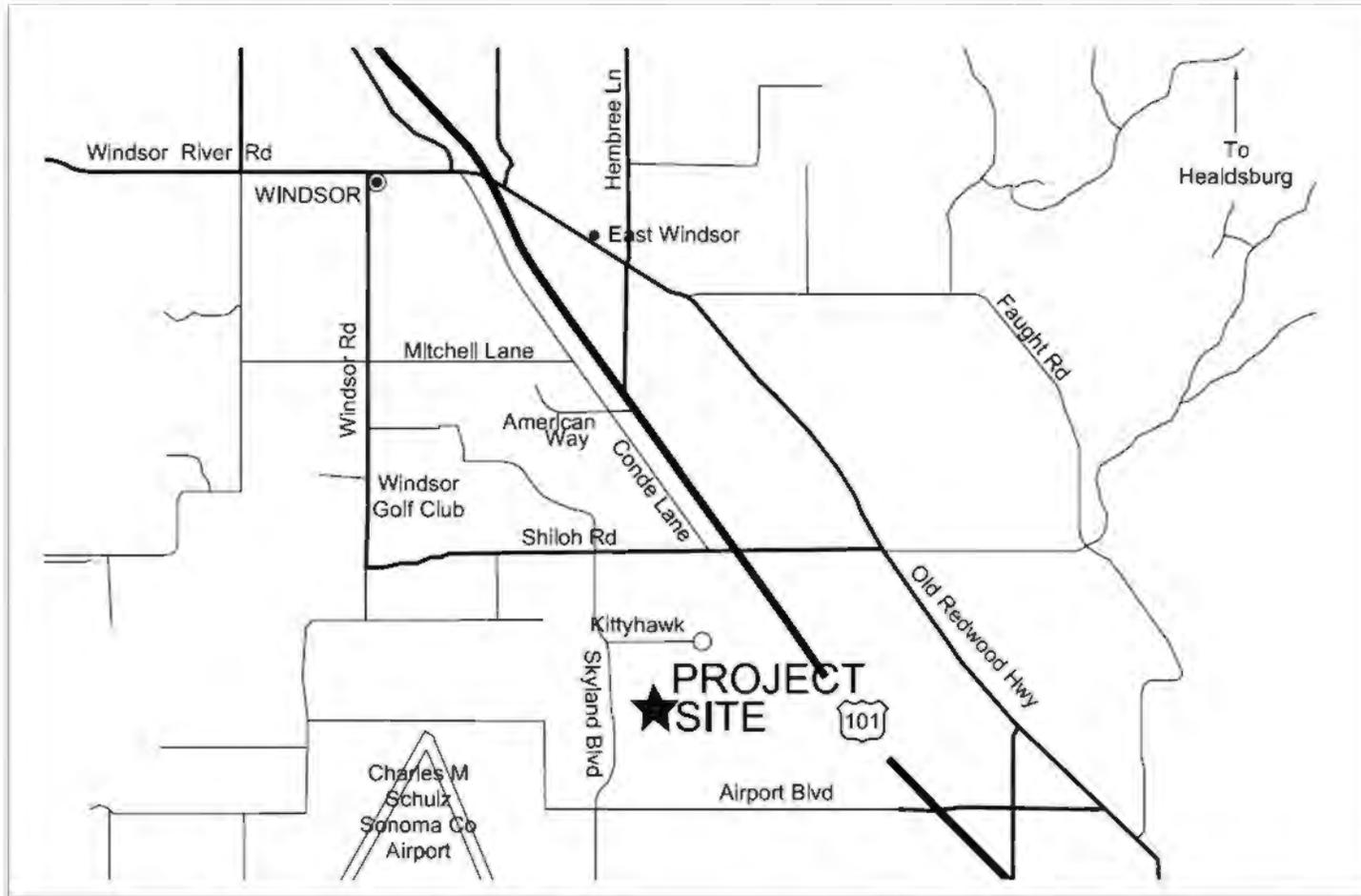


Figure 3. Aerial View



IV. ISSUES RAISED BY THE PUBLIC OR AGENCIES

Agency Referral

A referral packet was drafted and circulated to inform and solicit comments from selected relevant local, state and federal agencies; and to special interest groups that were anticipated to take interest in the project. The Northwest Information Center recommended a cultural resources study, which was subsequently prepared by Tom Origer & Associates. The California Department of Fish and Wildlife indicated that the site should be evaluated for wetlands and endangered plant species. Sol Ecology prepared a biological resources assessment and the results are discussed in the biological resources section of this document.

Tribal Consultation under AB 52

Referrals were sent to the following Tribes on October 21, 2019:

Cloverdale Rancheria of Pomo Indians
Dry Creek Rancheria Band of Pomo Indians
Torres Martinez Desert Cahuilla Indians
Mishewal Wappo Tribe of Alexander Valley
Middletown Rancheria Band of Pomo Indians
Lytton Rancheria of California
Kashia Pomos Stewarts Point Rancheria
Federated Indians of Graton Rancheria

Lytton Rancheria of California requested that a cultural resources survey be conducted. The study prepared by Tom Origer & Associates was sent to Lytton Rancheria, and standard discovery conditions of approval were requested.

Public Comments

No public comment has been received to date.

V. EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts of this project based on the criteria set forth in the State CEQA Guidelines and the County's implementing ordinances and guidelines. For each item, one of four responses is given:

No Impact: The project would not have the impact described. The project may have a beneficial effect, but there is no potential for the project to create or add increment to the impact described.

Less Than Significant Impact: The project would have the impact described, but the impact would not be significant. Mitigation is not required, although the project applicant may choose to modify the project to avoid the impacts.

Potentially Significant Unless Mitigated: The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will reduce the impact to a less than significant level.

Potentially Significant Impact: The project would have the impact described, and the impact could be significant. The impact cannot be reduced to less than significant by incorporating

mitigation measures. An environmental impact report must be prepared for this project.

Each question was answered by evaluating the project as proposed, that is, without considering the effect of any added mitigation measures. The Initial Study includes a discussion of the potential impacts and identifies mitigation measures to substantially reduce those impacts to a level of insignificance where feasible. All references and sources used in this Initial Study are listed in the Reference section at the end of this report and are incorporated herein by reference.

Ken Di Lillo has agreed to accept all mitigation measures listed in this Initial Study as conditions of approval for the proposed project, and to obtain all necessary permits, notify all contractors, agents and employees involved in project implementation and any new owners should the property be transferred to ensure compliance with the mitigation measures.

1. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

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

Comment

The project site is not located in an area designated as visually sensitive by the Sonoma County General Plan. It is not located on a scenic hillside, nor would it involve tree removal, grading, or construction that could affect a scenic vista. The project site is located in an existing industrial area and would have no impact on scenic vistas in Sonoma County.

Significance Level:

No Impact

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

Comment

The project is not located on or visible from a state scenic highway. The two officially designated state scenic highways in Sonoma County are Highway 12 and Highway 116. The site is not visible from either of these highways, therefore the project would not result in any impacts to scenic resources associated with a state scenic highway.

Significance Level

No Impact

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?

Comment

The project is in an existing urbanized industrial and commercial area adjacent to other industrial uses. Using the County's Visual Assessment Guidelines¹, the project site is characterized as having

¹ "Visual Assessment Guidelines," Permit Sonoma, January 2019, <https://sonomacounty.ca.gov/PRMD/Regulations/Environmental-Review-Guidelines/Visual-Assessment->

Low visual sensitivity because it is within an urban land use designation, has no historic character, and no significant natural vegetation of aesthetic value to the surrounding community. The project's visual dominance can be categorized as Subordinate, a category applied when proposed project elements generally repeat the form, line, color, texture, and night lighting of surrounding elements; are minimally visible from public views; and do not attract attention separate from existing uses at the project site. The warehouse will blend with other development in the surrounding area. Utilizing the Visual Assessment Guidelines' matrix, the project's visual impact will be less than significant.

Table 1. Thresholds of Significance for Visual Impact Analysis, PRMD Visual Assessment Guidelines

Sensitivity	Visual Dominance			
	<i>Dominant</i>	<i>Co-Dominant</i>	<i>Subordinate</i>	<i>Inevident</i>
<i>Maximum</i>	Significant	Significant	Significant	Less than significant
<i>High</i>	Significant	Significant	Less than significant	Less than significant
<i>Moderate</i>	Significant	Less than significant	Less than significant	Less than significant
<i>Low</i>	Less than significant	Less than significant	Less than significant	Less than significant

Significance Level
 Less than Significant

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

Comment

The new buildings would introduce new sources of light and glare. However, proposed lighting would not be substantially greater than existing lighting in the business park, and would be located away from public areas. The project is located down an existing driveway, removed from Aviation Boulevard, therefore, no new lighting is proposed on public street frontage.

Because an exterior lighting plan will be reviewed and approved by Design Review Committee prior to issuance of building permits to ensure compliance with County standards and compatibility with the area, this impact will be less than significant.

Significance Level
 Less than Significant

2. AGRICULTURE AND FOREST RESOURCES

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

Would the project:

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

Comment

The project parcel is mapped as Urban and Built-Up Land and Farmland of Local Importance. Therefore, no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be converted to a non-agricultural use.

Significance Level

No Impact

- b) **Conflict with existing zoning for agricultural use, or Williamson Act Contract?**

Comment

The parcel is zoned MP (Industrial Park), which allows warehouse uses, and is not subject to a Williamson Act Land Conservation Contract. The project will not conflict with zoning for agricultural use or lands under a Land Conservation contract.

Significance Level

No Impact

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

Comment

The project site is not in a Timberland Production zoning district, and no forested land or commercial timberland is present. Therefore, the proposed project would not conflict with or cause a rezoning of any forest land or timberland zoned Timberland Production.

Significance Level

No Impact

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

Comment

The project would not be located on land utilized or zoned for forest land, timberland, or timber production. Therefore, the project would not result in the loss or conversion of forest land.

Significance Level

No Impact

- 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?**

Comment

The project does not involve other changes in the environment that could result in conversion of farmland to non-agricultural use or forest land to non-forest use. The property, itself, is not agriculturally zoned. The proposed warehouse project does not include residential development that might result in a nuisance conflict with nearby agricultural uses.

Significance Level

No Impact

3. AIR QUALITY

The methodologies and assumptions used in preparation of this section follow the CEQA Guidelines developed by the Bay Area Air Quality Management District (BAAQMD), as revised in May 2017². Information on existing air quality conditions, federal and state ambient air quality standards, and pollutants of concern was obtained from the U.S. Environmental Protection Agency (U.S. EPA), California Air Resources Board (CARB), and BAAQMD.

Would the project:

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

Comment

The project is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD), which is currently designated as a nonattainment area for State and federal ozone standards, the State PM₁₀ standard, and State and federal PM_{2.5} standards. The District has adopted an Ozone Attainment Plan and a Clean Air Plan in compliance with federal and State Clean Air Acts. These plans include measures to achieve compliance with both ozone standards. The plans deal primarily with emissions of ozone precursors (nitrogen oxides [NO_x] and volatile organic compounds, also referred to as Reactive Organic Gases [ROG]). The BAAQMD provides screening criteria in its report, California Environmental Quality Act Air Quality Guidelines (May 2017). The “general light industry” category has a screening size of 541,000 square feet (or 1,249 employees) for operational criteria pollutants and a screening size of 259,000 square feet (or 540 employees) for construction-generated pollutants. Based on these screening criteria, the proposed project would be much smaller in scale and would be well below the emission thresholds for PM₁₀, PM_{2.5}, and ozone precursors, and therefore, would not conflict with or obstruct the implementation of applicable air quality plans.

Significance Level

Less than Significant

- b) **Violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

² Bay Area Air Quality Management District, “California Environmental Quality Act, Air Quality Guidelines,” May 2017, https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

Comment

State and Federal standards have been established for the “criteria pollutants”: ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide and particulates (PM10 and PM2.5). The pollutants NOx (nitrogen oxides) and reactive organic gases (ROG) form ozone in the atmosphere in the presence of sunlight. The principal source of ozone precursors is vehicle emissions, although stationary internal combustion engines are also considered a source. Following use of the screening criteria for ROG and NOx, found in the BAAQMD Air Quality Guidelines (Table 3-1), a detailed air quality study is not required, and emissions of criteria pollutants from the project would be less than significant.

Significance Level

Less than Significant

- c) **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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

Comment

The project will not have a cumulative effect on ozone because it will not generate substantial traffic which would result in substantial emissions of ozone precursors (ROG and NOx).

The project will have no long-term effect on PM_{2.5} and PM₁₀, because all surfaces will be paved, gravel, landscaped or otherwise treated to stabilize bare soils, and dust generation will be insignificant. However, there could be a significant short-term emission of dust (which would include PM_{2.5} and PM₁₀) during construction. These emissions could be significant at the project level, and could also contribute to a cumulative impact. This impact would be reduced to less than significant by including dust control measures as described in the following mitigation measure.

Significance Level

Less than Significant with Mitigation Incorporated

Mitigation

Mitigation Measure AIR-1: The following dust and air quality control measures shall be included in the project:

- a. Water or alternative dust control method shall be sprayed to control dust on construction areas, soil stockpiles, and staging areas during construction as directed by the County.
- b. Trucks hauling soil, sand, and other loose materials over public roads shall cover the loads, or shall keep the loads at least two feet below the level of the sides of the container, or shall wet the load sufficiently to prevent dust emissions.
- c. Vehicle speeds on unpaved areas shall be limited to 15 miles per hour.
- d. Final surfacing (i.e., pavement or concrete, gravel, landscaping) shall be completed as soon as possible after earthwork is finished, unless seeding or soil binders are used.
- e. Idling time of diesel-powered construction equipment shall be limited to five minutes. Signs shall be posted reminding workers of this idling restriction at all access points and equipment staging areas during construction of the proposed project.
- f. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications and shall have a CARB-certified visible emissions evaluator check equipment prior to use at the site.
- g. Trackout shall not be allowed at any active exit from the project site onto an adjacent

paved public roadway or shoulder of a paved public roadway that exceeds cumulative 25 linear feet and creates fugitive dust visible emissions without cleaning up such trackout within 4 hours of when the Construction Coordinator identifies such excessive trackout, and shall not allow more than 1 quart of trackout to remain on the adjacent paved public roadway or the paved shoulder of the paved public roadway at the end of any workday.

- h. Visible emissions of fugitive dust shall not be allowed during cleanup of any trackout that exceeds 20 percent opacity as determined by the Environmental Protection Agency in *Method 203B - Opacity Determination for Time-Exception Regulations* (August 2017).

Trackout is defined by BAAQMD in *Regulation 6, Rule 6: Prohibition of Trackout* (August 2018) as any sand, soil, dirt, bulk materials or other solid particles from a site that adhere to or agglomerate on the exterior surfaces of vehicles (including tires), and subsequently fall or are dislodged onto a paved public roadway or the paved shoulder of a paved public roadway on the path that vehicles follow at any exit and extending 50 feet out onto the paved public roadway beyond the boundary of the site. Material that has collected on the roadway from erosion is not trackout.

Monitoring AIR-1: Permit Sonoma staff shall verify that the AIR-1 measures are included on all site alteration, grading, building or improvement plans prior to issuance of grading or building permits.

d) Expose sensitive receptors to substantial pollutant concentrations?

Comment

Sensitive receptors are facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent facilities, and residential areas are examples of sensitive receptors. Localized impacts to sensitive receptors generally occur when sources of air pollutants and sensitive receptors are located near one another. The project site is residentially zoned with limited agricultural uses and abuts other residential and agricultural parcels. The project would not expose these sensitive receptors to significant concentrations of pollutants because of the analysis above in 3(b) and 3(c). The proposed project would not create an incompatible situation as neither the residential use of the project site nor the neighboring uses involve stationary or point sources of air pollutants which generate substantial pollutant concentrations. Although there will be no long term increase in emissions, during construction of future build-out there could be significant short term dust emissions that would affect nearby residents. Dust emissions can be reduced to less than significant by Mitigation Measure AIR-1.

Significance Level

Less than Significant with Mitigation Incorporated

Mitigation

See Mitigation Measure AIR-1.

e) Create objectionable odors affecting a substantial number of people?

Comment

The project is not an odor-generating use generally, and most operations will occur inside of the warehouse with the exception of loading and unloading at the dock. Construction equipment may generate odors during project construction; however, construction activities would be short-term, intermittent, and would cease upon completion of project construction. In addition, implementation of Mitigation Measure AIR-1 would reduce construction vehicle emissions which could contribute to odor

and would not affect a substantial number of people. Therefore, the construction-related odor impact would be less than significant.

Significance Level

Less than Significant with Mitigation Incorporated

Mitigation

See Mitigation Measure AIR-1.

4. BIOLOGICAL RESOURCES

Regulatory Framework

The following discussion identifies federal, state and local environmental regulations that serve to protect sensitive biological resources relevant to the California Environmental Quality Act (CEQA) review process.

FEDERAL

Federal Endangered Species Act (FESA)

FESA establishes a broad public and federal interest in identifying, protecting, and providing for the recovery of threatened or endangered species. The Secretary of Interior and the Secretary of Commerce are designated in FESA as responsible for identifying endangered and threatened species and their critical habitat, carrying out programs for the conservation of these species, and rendering opinions regarding the impact of proposed federal actions on listed species. The USFWS and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries) are charged with implementing and enforcing the FESA. USFWS has authority over terrestrial and continental aquatic species, and NOAA Fisheries has authority over species that spend all or part of their life cycle at sea, such as salmonids.

Section 9 of FESA prohibits the unlawful "take" of any listed fish or wildlife species. Take, as defined by FESA, means "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such action." USFWS's regulations define harm to mean "an act which actually kills or injures wildlife." Such an act "may include "significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering" (50 CFR § 17.3). Take can be permitted under FESA pursuant to sections 7 and 10.

Section 7 provides a process for take permits for federal projects or projects subject to a federal permit, and Section 10 provides a process for incidental take permits for projects without a federal nexus. FESA does not extend the take prohibition to federally listed plants on private land, other than prohibiting the removal, damage, or destruction of such species in violation of state law.

Critical Habitat

Critical habitat is a term defined in the ESA as a specific geographic area that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. The ESA requires federal agencies to consult with the USFWS to conserve listed species on their lands and to ensure that any activities or projects they fund, authorize, or carry out will not jeopardize the survival of a threatened or endangered species. In consultation for those species with critical habitat, federal agencies must also ensure that their activities or projects do not adversely modify critical habitat to the point that it will no longer aid in the species' recovery. In many cases, this level of protection is similar to that already provided to species by the ESA jeopardy standard. However, areas that are currently unoccupied by the species but which are needed for the species' recovery are protected

by the prohibition against adverse modification of critical habitat.

Essential Fish Habitat

Essential Fish Habitat (EFH) is regulated through the NMFS, a division of the National Oceanic and Atmospheric Administration (NOAA). Protection of Essential Fish Habitat is mandated through changes implemented in 1996 to the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) to protect the loss of habitat necessary to maintain sustainable fisheries in the United States. The Magnuson-Stevens Act defines Essential Fish Habitat as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity" [16 USC 1802(10)]. NMFS further defines essential fish habitat as areas that "contain habitat essential to the long-term survival and health of our nation's fisheries" Essential Fish Habitat can include the water column, certain bottom types such as sandy or rocky bottoms, vegetation such as eelgrass or kelp, or structurally complex coral or oyster reefs. Under regulatory guidelines issued by NMFS, any federal agency that authorizes, funds, or undertakes action that may affect EFH is required to consult with NMFS (50 CFR 600.920).

The Migratory Bird Treaty Act of 1918 (MBTA)

The U.S. MBTA (16 USC §§ 703 et seq., Title 50 Code of Federal Regulations [CFR] Part 10) states it is "unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill; attempt to take, capture or kill; possess, offer for sale, sell, offer to barter, barter, offer to purchase, purchase, deliver for shipment, ship, export, import, cause to be shipped, exported, or imported, deliver for transportation, transport or cause to be transported, carry or cause to be carried, or receive for shipment, transportation, carriage, or export any migratory bird, any part, nest, or egg of any such bird, or any product, whether or not manufactured, which consists, or is composed in whole or in part, of any such bird or any part, nest or egg thereof..." In short, under MBTA it is illegal to disturb a nest that is in active use, since this could result in killing a bird, destroying a nest, or destroying an egg. The USFWS enforces MBTA. The MBTA does not protect some birds that are non-native or human-introduced or that belong to families that are not covered by any of the conventions implemented by MBTA. In 2017, the USFWS issued a memorandum stating that the MBTA does not prohibit incidental take; therefore, the MBTA is currently limited to purposeful actions, such as directly and knowingly removing a nest to construct a project, hunting, and poaching.

The Clean Water Act (CWA)

The CWA is the primary federal law regulating water quality. The implementation of the CWA is the responsibility of the U.S. Environmental Protection Agency (EPA). However, the EPA depends on other agencies, such as the individual states and the U.S. Army Corps of Engineers (USACE), to assist in implementing the CWA. The objective of the CWA is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Section 404 and 401 of the CWA apply to activities that would impact waters of the U.S. The USACE enforces Section 404 of the CWA and the California State Water Resources Control Board enforces Section 401.

Section 404.

As part of its mandate under Section 404 of the CWA, the EPA regulates the discharge of dredged or fill material into "waters of the U.S.". "Waters of the U.S: include territorial seas, tidal waters, and non-tidal waters in addition to wetlands and drainages that support wetland vegetation, exhibit ponding or scouring, show obvious signs of channeling, or have discernible banks and high-water marks. Wetlands are defined as those areas "that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3(b)). The discharge of dredged or fill material into waters of the U.S. is prohibited under the CWA except when it is in compliance with Section 404 of

the CWA. Enforcement authority for Section 404 was given to the USACE, which it accomplishes under its regulatory branch. The EPA has veto authority over the USACE's administration of the Section 404 program and may override a USACE decision with respect to permitting. Substantial impacts to waters of the U.S. may require an Individual Permit's Projects that only minimally affect waters of the U.S. may meet the conditions of one of the existing Nationwide Permits, provided that such permit's other respective conditions are satisfied. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions (see below).

Section 401.

Any applicant for a federal permit to impact waters of the U.S. under Section 404 of the CWA, including Nationwide Permits where pre-construction notification is required, must also provide to the USACE a certification or waiver from the State of California. The "401 Certification" is provided by the State Water Resources Control Board through the local Regional Water Quality Control Board (RWQCB). The RWQCB issues and enforces permits for discharge of treated water, landfills, storm-water runoff, filling of any surface waters or wetlands, dredging, agricultural activities and wastewater recycling. The RWQCB recommends the "401 Certification" application be made at the same time that any applications are provided to other agencies, such as the USACE, USFWS, or NOAA Fisheries. The application is not final until completion of environmental review under the CEQA. The application to the RWQCB is similar to the pre-construction notification that is required by the USACE. It must include a description of the habitat that is being impacted, a description of how the impact is proposed to be minimized and proposed mitigation measures with goals, schedules, and performance standards. Mitigation must include a replacement of functions and values, and replacement of wetland at a minimum ratio of 2:1, or twice as many acres of wetlands provided as are removed. The RWQCB looks for mitigation that is on site and in-kind, with functions and values as good as or better than the water-based habitat that is being removed.

STATE

California Endangered Species Act (CESA)

Provisions of CESA protect state-listed threatened and endangered species. The CDFW is charged with establishing a list of endangered and threatened species. CDFW regulates activities that may result in "take" of individuals (i.e., "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill"). Habitat degradation or modification is not expressly included in the definition of "take" under the California Fish and Game Code (CFGC), but CDFW has interpreted "take" to include the killing of a member of a species which is the proximate result of habitat modification.

Fish and Game Code 1600-1602

Sections 1600-1607 of the CFGC require that a Notification of Lake or Streambed Alteration Agreement (LSAA) application be submitted to CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake." CDFW reviews the proposed actions in the application and, if necessary, prepares a LSAA that includes measures to protect affected fish and wildlife resources, including mitigation for impacts to bats and bat habitat.

Nesting Birds

Nesting birds, including raptors, are protected under CFGC Section 3503, which reads, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In addition, under CFGC Section 3503.5, "it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto". Passerines and non-passerine land birds are further protected

under CFGC 3513. As such, CDFW typically recommends surveys for nesting birds that could potentially be directly (e.g., actual removal of trees/vegetation) or indirectly (e.g., noise disturbance) impacted by project-related activities. Disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by CDFW.

Non-Game Mammals

Sections 4150-4155 of the CFGC protects non-game mammals, including bats. Section 4150 states “A mammal occurring naturally in California that is not a game mammal, fully protected mammal, or fur-bearing mammal is a nongame mammal. A non-game mammal may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the commission”. The non-game mammals that may be taken or possessed are primarily those that cause crop or property damage. Bats are classified as a non-game mammal and are protected under the CFGC.

California Fully Protected Species

The classification of “fully protected” was the CDFW’s initial effort to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, amphibians and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under CESA and/or FESA. The Fish and Game Code sections (fish at §5515, amphibians and reptiles at §5050, birds at §3503 and §3511, and mammals at §4150 and §4700) dealing with “fully protected” species state that these species “...may not be taken or possessed at any time and no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected species,” although take may be authorized for necessary scientific research. This language makes the “fully protected” designation the strongest and most restrictive regarding the “take” of these species. In 2003, the code sections dealing with “fully protected” species were amended to allow the CDFW to authorize take resulting from recovery activities for state-listed species.

Species of Special Concern

California Species of Special Concern (CSC) are broadly defined as animals not listed under the FESA or CESA, but which are nonetheless of concern to the CDFW because they are declining at a rate that could result in listing or because they historically occurred in low numbers and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by the CDFW, land managers, consulting biologists, and others, and is intended to focus attention on the species to help avert the need for costly listing under FESA and CESA and cumbersome recovery efforts that might ultimately be required. This designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. Although these species generally have no special legal status, they are given special consideration under the CEQA during project review.

Porter-Cologne Water Quality Control Act

The intent of the Porter-Cologne Water Quality Control Act (Porter-Cologne) is to protect water quality and the beneficial uses of water, and it applies to both surface and ground water. Under this law, the State Water Resources Control Board develops statewide water quality plans, and the RWQCBs develop basin plans that identify beneficial uses, water quality objectives, and implementation plans. The RWQCBs have the primary responsibility to implement the provisions of both statewide and basin plans. Waters regulated under Porter-Cologne, referred to as “waters of the State,” include isolated waters that are not regulated by the USACE. Projects that require a USACE permit, or fall under other federal jurisdiction, and have the potential to impact waters of the State are required to comply with the terms of the Water Quality Certification Program. If a proposed project does not require a federal license or permit,

any person discharging, or proposing to discharge, waste (e.g., dirt) to waters of the State must file a Report of Waste Discharge and receive either waste discharge requirements (WDRs) or a waiver to WDRs before beginning the discharge.

LOCAL

Sonoma County General Plan

The *Sonoma County General Plan 2020* Land Use Element and Open Space & Resource Conservation Element both contain policies to protect natural resource lands including, but not limited to, watershed, fish and wildlife habitat, biotic areas, and habitat connectivity corridors.

Valley Oak Habitat (VOH) Combining District

The VOH combining district is established to protect and enhance valley oaks and valley oak woodlands and to implement the provisions of Sonoma County General Plan 2020 Resource Conservation Element Section 5.1. Design review approval may be required of projects in the VOH, which would include measures to protect and enhance valley oaks on the project site, such as requiring that valley oaks shall comprise a minimum of fifty percent (50%) of the required landscape trees for the development project.

Riparian Corridor (RC) Combining District

The RC combining district is established to protect biotic resource communities, including critical habitat areas within and along riparian corridors, for their habitat and environmental value, and to implement the provisions of the General Plan Open Space and Resource Conservation and Water Resources Elements. These provisions are intended to protect and enhance riparian corridors and functions along designated streams, balancing the need for agricultural production, urban development, timber and mining operations, and other land uses with the preservation of riparian vegetation, protection of water resources, floodplain management, wildlife habitat and movement, stream shade, fisheries, water quality, channel stability, groundwater recharge, opportunities for recreation, education and aesthetic appreciation and other riparian functions and values.

Sonoma County Tree Protection Ordinance

The Sonoma County Tree Protection Ordinance (Sonoma County Code of Ordinances, Chapter 26, Article 88, Sec. 26-88-010 [m]) establishes policies for protected tree species in Sonoma County. Protected trees are defined (Chapter 26, Article 02, Sec. 26- 02-140) as the following species: big leaf maple (*Acer macrophyllum*), black oak (*Quercus kelloggii*), blue oak (*Quercus douglasii*), coast live oak (*Quercus agrifolia*), interior live oak (*Quercus wislizenii*), madrone (*Arbutus menziesii*), oracle oak (*Quercus morehus*), Oregon oak (*Quercus garryana*), redwood (*Sequoia sempervirens*), valley oak (*Quercus lobata*), California bay (*Umbellularia californica*), and their hybrids.

Would the project:

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

Regulatory Framework

Special-Status Species

Special-status species include those plant and wildlife species that have been formally listed, are

proposed as endangered or threatened, or are candidates for such listing under the federal Endangered Species Act (ESA) or California Endangered Species Act (CESA). These acts afford protection to both listed and proposed species. In addition, California Department of Fish and Wildlife (CDFW) Species of Special Concern, which are species that face extirpation in California if current population and habitat trends continue, U.S. Fish and Wildlife Service (The Service) Birds of Conservation Concern, and CDFW special-status invertebrates, are all considered special-status species. Although CDFW Species of Special Concern generally have no special legal status, they are given special consideration under the California Environmental Quality Act (CEQA). In addition to regulations for special-status species, most birds in the United States, including non-status species, are protected by the Migratory Bird Treaty Act of 1918. Plant species on California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants with California Rare Plant Ranks (Rank) of 1 and 2 are also considered special-status plant species and must be considered under CEQA. Bat species designated as "High Priority" by the Western Bat Working Group (WBWG) qualify for legal protection under Section 15380(d) of the CEQA Guidelines. Species designated High Priority" are defined as "imperiled or are at high risk of imperilment based on available information on distribution, status, ecology and known threats.

Comment

Dana Riggs, Principal Biologist at Sol Ecology, performed an assessment of biological resources, which included a field survey on November 12, 2019, to evaluate the potential presence of sensitive biological communities, the potential for the site to support special-status plant and wildlife species, and the potential presence of any other sensitive natural resources protected by local, state, or federal laws and regulations. The assessment³, dated December 9, 2019 and updated on July 13, 2020, found:

- No sensitive vegetation communities, such as wetlands, on the site;
- Low potential for three special status plant species to be present on site and impacted by the project, including Bent-flowered fiddleneck (*Amsinckia lunaris*), Congested-headed hayfield tarplant (*Hemizonia congesta ssp. congesta*), and Two-fork clover (*Trifolium amoenum*); and
- Low potential for two special-status wildlife species including California tiger salamander (*Ambystoma californiense*) and burrowing owl (*Athene cunicularia*), and nesting birds generally to be present on the site and impacted by the project.

No special-status plant or wildlife species were observed during the field survey. The above conclusions were substantiated by the field survey, a literature and records review, and a plant survey report by Ted Winfield & Associates dated August 2, 2016⁴. Additionally, a Senior Environmental Specialist from Permit Sonoma's Natural Resources section conducted a site visit in August 2020 with biologists from Sol Ecology to review site conditions. The results of the site visit were summarized by Sol Ecology in a memorandum dated August 27, 2020⁵.

Vegetation onsite is primarily disturbed California non-native annual grassland with discernible species including harding grass (*Phalaris aquatica*), ripgut grass (*Bromus diandrus*), slender wild oat (*Avena barbata*), and soft chess (*Bromus hordeaceus*). Common non-native forbs include bindweed (*Convolvulus arvensis*), bristly ox-tongue (*Helminthotheca echioides*), English plantain (*Plantago lanceolata*), radish (*Raphanus sativus*), rough cat's-ear (*Hypochaeris radicata*), and vetch (*Vicia sativa*). There are patches of Himalayan blackberry (*Rubus armeniacus*) along the perimeter of the

³ Riggs, Dana, "Biological Resources Report, 685 Aviation Boulevard, Santa Rosa, Sonoma County, CA", Sol Ecology, July 13, 2020

⁴ Winfield, Ted, Ph.D, "Results of 2016 Plant Survey at Aviation Blvd. Property (APN 059-340-056)", Ted Winfield & Associates, August 2, 2016

⁵ Riggs, Dana, and Mark Kalnins, "Supplemental Wetland Delineation Study, 685 Aviation Blvd., Santa Rosa (APN 059-340-056)", Sol Ecology, August 27, 2020

site as well as emergent coast live oak trees (*Quercus agrifolia*) and ornamentals including Chinese pistache (*Pistacia chinensis*) and thorny olive (*Elaeagnus pungens*). Soils at the site are mapped as Huichica loam, ponded, 0 to 5 percent slopes and Huichica loam, shallow, ponded, 0 to 5 percent slopes.

Special-status Plant Species

Three special-status plant species were determined to have low potential to occur onsite:

- Bent-flowered fiddleneck (*Amsinckia lunaris*) – CNPS Rank 1B.2
- Two-fork clover (*Trifolium amoenum*) – Endangered (Federal Listing), CNPS Rank 1B.1
- Congested-headed hayfield tarplant (*Hemizonia congesta* ssp. *congesta*) – CNPS Rank 1B.2

It is highly unlikely that other special-status species beyond those listed above would be present because conditions necessary to support habitat for those species are not present on the site (e.g. hydrologic, soil, topographic, or unique PH conditions; or upland forest).

All three species with minor potential for presence are typically found in grassland habitat, though bent-flowered fiddleneck and two-fork clover may also be found in coastal bluffs. Bent-flowered fiddleneck may also occur in woodland habitat. Marginally suitable grassland habitat is present on the site for these species. The potential for presence is low due to lack of habitat and given that they were not found during the April 2016 plant surveys conducted by Ted P. Winfield or the November 2019 survey by Sol Ecology. Although onsite habitat is not highly suitable and the potential for presence is low, mitigation measure BIO-1 would ensure the potential impact is less than significant.

Special-status Wildlife Species

Burrowing owl (Athene cunicularia)

Burrowing owl is a CDFW Species of Special Concern and USFWS Bird of Conservation Concern. The burrowing owl occurs as a year-round resident and winter visitor in much of California's lowlands, inhabiting open areas with sparse or non-existent tree or shrub canopies. Typical habitat is annual or perennial grassland, although human-modified areas such as agricultural lands and airports are also used. This species is dependent on burrowing mammals to provide the burrows that are characteristically used for shelter and nesting, and in northern California is typically found in close association with California ground squirrels.

A single occurrence of burrowing owl from 2017 is documented within one mile to the west of the project site, near the airport. This occurrence was observed to be a winter visitor residing in a rip-rapped culvert. While generally suitable grassland habitat is present on the site, the species is not expected to be present due to the lack of available cover (culverts, debris, suitably sized burrows). Furthermore, feeding and housing of a feral cat colony was observed on the northern portion of site. Feral cats are a primary predator of burrowing owl and also small burrowing mammals that are the prey base and shelter providers for this species. Based on site conditions, there is low potential for this species to be present and impacted by the project.

Nesting Birds

Birds and raptors are protected under the federal Migratory Bird Treaty Act (50 CFR 10.13), and their nest, eggs, and young are also protected under the California Fish and Wildlife Code (§3503, §3503.5, and §3800). In addition, raptors such as the white-tailed kite are "fully protected" under the Fish and Wildlife Code (§3511). Fully protected raptors cannot be taken or possessed at any time. Trees along the perimeter of the project site could provide suitable nesting habit for birds. One tree is proposed for relocation on the site, and one other may be removed then replaced. No impacts to nesting birds or their habitat are anticipated, however, if nesting birds are present in trees at the

project site, the relocation or removal, and construction noise would have the potential to impact these species. Mitigation Measure BIO-2 would reduce the impact to nesting birds to a less than significant level.

California tiger salamander (Ambystoma californiense)

The Sonoma County Distinct Population Segment (DPS) of the California tiger salamander (CTS) is listed as Endangered under the ESA and Threatened under the CESA. CTS is a large terrestrial salamander restricted to grasslands and low-elevation foothill regions in California (generally under 1500 feet) where it uses seasonal aquatic habitats for breeding. This salamander breeds in natural ephemeral pools, or ponds that mimic ephemeral pools (e.g., stock ponds that go dry), and occupy substantial areas surrounding the breeding pool as adults. Larval CTS require at least 10-12 weeks to complete their larval stage, so pools must be inundated for at least this long for them to support successful CTS recruitment. CTS spend most of their life in grasslands surrounding breeding pools, surviving hot, dry summers by living underground in burrows such as those created by ground squirrels, gophers or other mammals. Individuals may also use deep cracks or holes in the ground where the soil atmosphere remains near the water saturation point of breeding pools. During wet periods, CTS may emerge from refugia and feed in the surrounding grasslands.

There are no aquatic features on or in the immediate vicinity of the project site that would provide suitable breeding habitat for CTS. As further discussed in section 4(c), there are no seasonal wetlands onsite. The site contains suitable grassland habitat and very few small mammal burrows that could be utilized by CTS. The nearest documented occurrence is 3.1 miles from the site, which is beyond the documented dispersal range of this species. There is a low possibility of CTS being present on site. Mitigation as required by the 2020 Programmatic Biological Opinion for the Santa Rosa Plain will reduce potential impacts to CTS to a less than significant level. See Mitigation Measure BIO-3.

Significance

Less than Significant with Mitigation Incorporated

Mitigation

Mitigation Measure BIO-1: If initial ground disturbance occurs during the flowering periods for bent-flowered fiddleneck (March-June), two-fork clover (April-June), or congested-headed hayfield tarplant (April-November), a qualified biologist shall conduct a pre-construction survey of the disturbance area prior to construction activities. Surveys shall be either focused or protocol-level surveys and follow methodologies outlined in relevant agency protocols. If special-status plants are observed, their locations shall be mapped and CDFW shall be contacted to determine the appropriate mitigation measure to avoid impacts on the species, including avoidance, creation of buffers, transplantation, or otherwise off-site mitigation.

Monitoring BIO-1: Prior to issuance of any grading permit(s) and through completion of initial site disturbance, the County shall review the results of all pre-construction surveys and any measures recommended by the biologist or CDFW to protect sensitive habitat or species. All measures shall be noted on the final project plans.

Mitigation Measure BIO-2: If initial ground disturbance or tree removal occurs during the breeding season for nesting birds (February 1 through August 31), a qualified biologist shall conduct a breeding bird survey no more than 7 days prior to ground disturbance to determine if any birds are nesting in underground burrows or dens, or in trees on or adjacent to the project site. If active nests are found close enough to the project site to affect breeding success, the biologist shall establish an appropriate exclusion zone around the nest. This exclusion zone may be modified depending on the

species, nest location, and existing visual buffers, but typically would entail a minimum of 500 feet for raptor species and 300 feet for other migratory species. Once all young have become independent of the nest, vegetation removal and grading may take place in the former exclusion zone. If initial ground disturbance is delayed or there is a break in project activities of more than 7 days within the bird-nesting season, then a follow-up nesting bird survey shall be performed to ensure no nests have been established in the interim.

Monitoring BIO-2: Prior to issuance of any grading permit(s) and through completion of initial site disturbance, the County shall review the results of all pre-construction surveys and any measures recommended by the biologist or CDFW to protect sensitive habitat or species. All measures shall be noted on the final project plans.

Mitigation Measure BIO-3: Prior to issuance of building or site development permits, the applicant is required to provide mitigation for impacts to potential CTS habitat, consistent with requirements of the Santa Rosa Plain Conservation Strategy and the 2020 Programmatic Biological Opinion. All CTS mitigation will be provided at an off-site location and will consist of the purchase of CTS credits from an approved mitigation bank. The appropriate mitigation ratio area shall be no less than 0.2:1 unless the applicant is able to obtain a “no effect” determination or similar clearance by the USFWS.

Monitoring BIO-3: Permit Sonoma staff shall withhold issuance of site development permits until verification is received indicating that CTS mitigation has been completed.

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

Comment

There are no stream channels, riparian habitat, oak woodland, or other sensitive natural communities onsite. The site is primarily California annual grassland.

Significance Level

No Impact

- 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?**

Comment

There are no wetlands on the project site. In November of 2019, Sol Ecology evaluated the site for wetlands. In the northern portion, a depression was observed with some hydrophytic vegetation in the herb stratum. The area was sampled but it did not meet any of the wetland indicators (hydrophytic vegetation, hydric soil, or hydrology)⁶.

Permit Sonoma staff from the Natural Resources division later met with Sol Ecology at the project site to review site conditions. Subsequent to the site inspection with staff, Sol Ecology performed additional plot-based sampling where County staff thought wetlands may be present, such as areas where slight topographic depressions exist or there were discernible changes in vegetation. No positive indicators of wetlands were found⁷. Vegetation communities were found to include

⁶ Riggs, Dana, “Biological Resources Report, 685 Aviation Boulevard, Santa Rosa, Sonoma County, CA”, Sol Ecology, July 13, 2020

⁷ Riggs, Dana, and Mark Kalnins, “Supplemental Wetland Delineation Study, 685 Aviation Blvd., Santa Rosa (APN 059-340-056)”, Sol Ecology, August 27, 2020

predominantly upland species, including *Phalaris aquatica* (FACU), Harding's grass; *Bromus hordeaceus* (FACU), soft brome; *Acmispon americanus* (UPL), deerweed; *Convolvulus arvensis* (NL), bindweed; *Sonchus oleraceus* (UPL), common sow-thistle; and *Medicago polymorpha* (FACU), toothed medic. Soils sampled in all of the plots were predominantly gravelly, mixed soils, with bright colors (10YR 4/4, 10YR 3/2), and no visible redoximorphic features, thus positive hydric soil indicators were determined to not be present.

Sol Ecology also inspected several small wood mulch piles for potential wetland fill. Review of aerial imagery for the property through Google Earth indicates that several medium shrubs (likely *Baccharis pilularis*, coyote brush; or *Rubus armeniacus*, Himalayan blackberry) were removed between February and September of 2009, and the wood mulch piles were likely left behind when the shrubs were removed. Mulch depth ranged from 2-4 inches in depth, and no buried vegetation was evident beneath the mulch. It was also determined that native soils beneath the mulch did not meet hydric soil field indicators, and wetlands were therefore not likely to be present at the time the shrubs were removed and the wood mulch was placed. Lastly, the areas immediately adjacent to the mulch were observed to be dominated by upland plants with no positive indicators of wetland hydrology. It was therefore concluded that the areas where mulch was observed were not likely to be wetlands prior to placement of the mulch.

Significance Level

No Impact

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

Comment

No wildlife corridors (e.g., stream channels, protected open space) or wildlife nursery sites (e.g., rookeries, barns, communal nesting areas) occur within or adjacent to the project site. The site is surrounded by dense commercial development on three sides. The project would have no impact on wildlife corridors or nursery sites.

Significance Level

No Impact

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

Comment

No riparian habitat or valley oak woodland is present on the project site and minor tree removal is proposed. One coast live oak will be relocated on the site and one may be removed, and if so, will be replaced by the same species. The project does not conflict with any local regulations protecting biological resources.

Significance Level

No Impact

- 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?**

Comment

The project site is located within the area of the Santa Rosa Plain Conservation Strategy. Mitigation measures BIO-3 discussed above ensures that the project does not conflict with any local, regional,

state, or federal conservation plans.

Significance Level

Less than Significant with Mitigation Incorporated

Mitigation

See Mitigation Measures BIO-3 and associated monitoring

5. CULTURAL RESOURCES

Would the project:

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

Comment

Elena Marella and Thomas Origer of Tom Origer & Associates conducted a cultural resources evaluation of the project site in December of 2019⁸. No structure, object, or other element meeting the definition of a historical resource was found, therefore there will be no impact.

Significance Level

No Impact

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

Comment

On October 21, 2019, Permit Sonoma staff referred the project application to Native American Tribes within Sonoma County to request consultation under AB-52. No requests for consultation were received. Lytton Rancheria of California requested that a cultural resources study be prepared.

As mentioned in the discussion of section 5(a), Tom Origer & Associates conducted a cultural resources evaluation of the project site. An intensive field survey was completed by a Taylor Alshuth and Elena Marella on December 10, 2019. Approximately two person hours were spent in the field and conditions were cloudy. Surface examination consisted of walking transects spaced 15-20 meters apart and a hoe was used as needed to expose the ground surface. Ground visibility ranged from excellent to poor, with vegetation being the primary hindrance. Natural obsidian pebbles were observed in the study area. In addition to a surface survey, two hand-dug auger borings were excavated. Each auger boring was excavated to a depth of 150 centimeters below the ground surface with a 4-inch diameter barrel auger. Auger Boring #1 had chunks of concrete present at a depth of 50 centimeters, which suggests prior ground disturbance.

A buried site model indicates that there is a high potential for buried resources; however, no archaeological site indicators were found with the auger borings during the field visit. Construction related to the project could uncover such materials. The following mitigation measure will reduce potential impacts to less than significant.

Significance Level

⁸ Marella, Elena, B.A. and Thomas M. Origer, M.A., "Cultural Resources Study of the Property at 685 Aviation Boulevard, Santa Rosa, Sonoma County, California", Tom Origer and Associates, December 20, 2019

Less than Significant with Mitigation Incorporated

Mitigation

Mitigation Measure CUL-1: All building and/or grading permits shall have the following note printed on grading or earthwork plan sheets:

“If paleontological resources or prehistoric, historic or tribal cultural resources are encountered during ground-disturbing work, all work in the immediate vicinity shall be halted and the operator must immediately notify the Permit and Resource Management Department (Permit Sonoma) – Project Review staff of the find. The operator shall be responsible for the cost to have a qualified paleontologist, archaeologist or tribal cultural resource specialist under contract to evaluate the find and make recommendations to protect the resource in a report to Permit Sonoma.

Paleontological resources include fossils of animals, plants or other organisms. Prehistoric resources include humanly modified stone, shell, or bones, hearths, firepits, obsidian and chert flaked-stone tools (e.g., projectile points, knives, choppers), midden (culturally darkened soil containing heat-affected rock, artifacts, animal bone, or shellfish remains), stone milling equipment, such as mortars and pestles, and certain sites features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe. Historic resources include all by-products of human use greater than fifty (50) years of age including, backfilled privies, wells, and refuse pits; concrete, stone, or wood structural elements or foundations; and concentrations of metal, glass, and ceramic refuse.

If human remains are encountered, work in the immediate vicinity shall be halted and the operator shall notify Permit Sonoma and the Sonoma County Coroner immediately. At the same time, the operator shall be responsible for the cost to have a qualified archaeologist under contract to evaluate the discovery. If the human remains are determined to be of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification so that a Most Likely Descendant can be designated and the appropriate measures implemented in compliance with the California Government Code and Public Resources Code.”

Monitoring CUL-1: Building/grading permits shall not be approved for issuance by Permit Sonoma staff until the above notes are printed on the building and grading plans.

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

Comment

The cultural resources evaluation conducted by professional archaeologists in December 2019 did not discover any unique paleontological or geological feature on the property, although paleontological features may be uncovered during project-related construction. Mitigation Measure CUL-1 will reduce potential impacts to less than significant.

Significance Level

Less than Significant with Mitigation Incorporated

Mitigation

See Mitigation Measure and Monitoring CUL-1.

d) Disturb any human remains, including those interred outside of dedicated cemeteries?

Comment

No burial sites are known in the vicinity of the project, and the project site has already been disturbed by past construction. Mitigation Measure CUL-1 will reduce potential impacts to less than significant.

Significance Level

Less than Significant with Mitigation Incorporated

Mitigation

See Mitigation Measure and Monitoring CUL-1

6. ENERGY

Would the project:

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

Comment

Long-term energy demand would result from operation of the warehouse, which would include activities such as lighting, heating, and cooling. Although implementation of the project could result in a net increase in energy usage, the increase would not be wasteful nor inefficient because of energy-efficient building design required by Title 24 of the California Building Code.

Significant energy use is not anticipated for project construction. The primary energy use would be the burning of fossil fuels associated with construction vehicles. Mitigation Measure AIR-1 limits idling time of diesel-powered construction equipment to less than five minutes, primarily to control dust and air quality impacts, but this measure would also reduce fuel consumption.

Significance Level

Less than Significant

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

Comment

The County of Sonoma has not adopted a local renewable energy plan; however, the General Plan includes a variety of policies intended to encourage development of renewable energy systems, while protecting sensitive resources and ensuring neighborhood compatibility. Although renewable energy is encouraged, there is no requirement to develop renewable energy sources for industrial development projects, outside of meeting Title 24 requirements discussed above. Additionally, the project is not located in an identified area designated for renewable energy productions nor would the project interfere with the installation of any renewable energy systems. Therefore, the project would not conflict with or obstruct with applicable State and local plans for promoting use of renewable energy and energy efficiency.

Significance Level

Less than Significant

7. GEOLOGY AND SOILS

Would the project:

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

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

Existing geologic conditions that could affect new development are considered in this analysis. Impacts of the environment on the project are analyzed as a matter of County policy and not because such analysis is required by CEQA.

Comment

The project site is not within a fault hazard zone as delineated by the Alquist-Priolo fault maps⁹.

Significance Level

No Impact

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

Comment

All of Sonoma County is subject to seismic shaking that would result from earthquakes along the San Andreas, Healdsburg-Rodgers Creek, and other faults. By applying geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage from seismic activity can be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake. The design and construction of new structures are subject to engineering standards of the California Building Code (CBC), which take into account soil properties, seismic shaking and foundation type. Standard conditions of approval require that building permits be obtained for all construction and that the project meet all standard seismic and soil test/compaction requirements.

Grading permits are required for all project related construction prior to commencement of ground disturbance and therefore, any required earthwork, grading, trenching, backfilling or compaction operations will be done in accordance with the County Subdivision Ordinance (Chapter 25, Sonoma County Code) and erosion control provisions of the Drainage and Storm Water Management Ordinance (Chapter 11, Sonoma County Code and Building Ordinance (Chapter 7, Sonoma County Code).

All project related construction activities are required to comply with the California Building Code regulations for seismic safety (i.e., reinforcing perimeter and/or load bearing walls, bracing parapets, etc.) as part of the permitting process. Construction plans shall be subject to review and approval of Permit Sonoma prior to the issuance of a building permit. All work shall be subject to inspection by Permit Sonoma and must conform to all applicable code requirements and approved improvement plans prior to the issuance of a certificate of occupancy.

Based on this uniformly applied regulatory process, the project would not expose people to substantial risk of injury from seismic shaking, and the potential impact is less than significant.

Significance Level

Less than Significant

⁹ California Department of Conservation, "EQ Zapp: California Earthquake Hazards Zone Application", May 15, 2020, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

iii. Seismic-related ground failure, including liquefaction?

Comment

Strong ground shaking can result in liquefaction, the sudden loss of shear strength in saturated sandy material, resulting in ground failure. Areas of Sonoma County most at risk of liquefaction are along San Pablo Bay and in alluvial valleys. According to the Sonoma County Hazard Mitigation Plan¹⁰, most of project site is located in an area of low susceptibility to liquefaction (Figure 8.1). A geotechnical report prepared by Reese & Associates in January 2019 found that the site can be used for the proposed construction. The report addresses site specific construction recommendations for site preparation and grading, foundation support, slab-on-grade, pavement thickness, geotechnical drainage, and retaining and loading dock wall design; and it will be reviewed by Permit Sonoma engineering staff during the building permit plan check process. As stated above, new structures are subject to engineering standards of the California Building Code, which require that the project meet all standard seismic and soil test/compaction requirements. Therefore, the potential impact from liquefaction would be less than significant.

Significance Level

Less than Significant

iv. Landslides?

Comment

Steep slopes characterize much of Sonoma County, particularly the northern and eastern portion of the County. Where these areas are underlain by weak or unconsolidated earth materials landslides are a hazard. The site is relatively flat, according to the Sonoma County Hazard Mitigation Plan (Figure 8.11), the project site has a Landslide Susceptibility Class of O and is not located in a designated Landslide Hazard Area.¹¹

Significance Level

Less than Significant

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

Comment

The project involves grading, cuts and fills which require the issuance of a grading permit. Improper grading, both during and post construction, has the potential to increase the volume of runoff from a site which could have adverse downstream flooding and further erosional impacts, and increase soil erosion on and off site which could adversely impact downstream water quality.

Erosion and sediment control provisions of the Drainage and Storm Water Management Ordinance (Chapter 11, Sonoma County Code) and Building Ordinance (Chapter 7, Sonoma County Code) require implementation of flow control best management practices to reduce runoff. Required inspection by Permit Sonoma staff insures that all grading and erosion control measures are constructed according to the approved plans. These ordinance requirements and adopted best management practices are specifically designed to maintain potential water quantity impacts at a less than significant level during and post construction.

Significance Level

Less than Significant

¹⁰ "2016 Sonoma County Operational Area Hazard Mitigation Plan", Sonoma County Permit and Resource Management Department, and Fire and Emergency Services Department, September 2017

¹¹ Ibid

- 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?**

Comment

The project site is subject to seismic shaking and other geologic hazards as described in item 6.a.ii, iii, and iv, above. However, site specific geologic investigation will be conducted through the site development permitting process, which require construction techniques that account for site specific conditions. The project site is not located within a designated Landslide Hazard Area, and is generally flat. Therefore, the potential impact from landslides or liquefaction would be less than significant

Significance Level

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?**

Comment

Table 18-1-B of the Uniform Building Code is an index of the relative expansive characteristics of soil as determined through laboratory testing. According to the National Resources Conservation Service Soil Survey of Sonoma County¹², soils on the project site consist of Huichica loam, ponded, 0 to 5 percent slopes and Huichica loam, shallow, ponded, 0 to 5 percent slopes. Huichica loam has moderate shrink-swell potential. The Reese & Associates investigation found that the site has moderate to possibly highly expansive clayey soils, which can undergo strength and volume changes with seasonal changes in moisture content¹³. These types of soils must be covered with a moisture confining and protecting blanket of imported soils with low expansion potential. Specific recommendations for site preparation, grading, and compaction were provided in the report, and will be reviewed by Permit Sonoma engineering staff during the building permit plan check process. As stated above, new structures are subject to engineering standards of the California Building Code, including standard seismic and soil test/compaction requirements, therefore the potential building failure impact related to expansive soils would be less than significant.

Significance Level

Less than Significant

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

Comment

The project will not use a septic system to dispose of wastewater. The project will connect to the Airport/Larkfield/Wikiup Sanitation District (Sonoma Water).

Significance Level

Less than Significant Impact

8. GREENHOUSE GAS EMISSIONS

¹² NRCS Soils Survey of Sonoma County

¹³ Fioni, Dan J., and Jeffrey K. Reese, "Soil Investigation, NeilMed Warehouse, 685 Aviation Boulevard, Santa Rosa, California", Reese & Associates, January 18, 2019

Would the project:

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

Comment

A Climate Action 2020 Plan was developed by the Sonoma County Regional Climate Plan Authority (RCPA) in 2016 but was unable to be formally adopted due to litigation. The Sonoma County Board of Supervisors adopted a Climate Change Action Resolution on May 8, 2018 which acknowledged the Climate Action 2020 Plan and resolved to "...work towards the RCPA's countywide target to reduce GHG emissions by 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050" as well as adopting twenty goals for reducing GHG emissions including increasing carbon sequestration, increasing renewable energy use, and reducing emissions from the consumption of goods and services. The Bay Area Air Quality Management District (BAAQMD) has published greenhouse gas significance thresholds for use by local governments in the report titled California Environmental Quality Act Air Quality Guidelines May 2017. For projects other than stationary sources, the greenhouse gas significance threshold is 1,100 metric tons per year of CO₂e or 4.6 metric tons of CO₂e per service population (residents and employees) per year. Using the report's screening criteria, the 59,066 square-foot warehouse is below the applicable screening criteria in Table 2-1 of the report for operational criteria air pollutants (864,000 square feet) and operational GHG (64,000 square feet).

For construction activities, the greatest source of greenhouse gas emissions would be diesel emissions from heavy equipment associated with grading and hardscape construction. The BAAQMD does not include a threshold of significance for construction-related GHG emissions. However, the project is below the BAAQMD report's screening criteria for construction related impacts (259,000 square feet). Emissions would be further reduced to a less than significant level with implementation of Mitigation Measure AIR-1, which requires that idling time of diesel-powered construction equipment be limited to five minutes.

Significance Level

Less than Significant Impact

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

Comment

The County has adopted General Plan Objective OSRC-14.4 which states "Reduce greenhouse gas emissions by 25% below 1990 levels by 2015. In May 2018, the Board of Supervisors adopted a Resolution of Intent to Reduce Greenhouse Gas Emissions that included adoption of the Regional Climate Protection Agency's goal to further reduce greenhouse gas emissions by 40% below 1990 levels by 2030 and by 80% below 1990 levels by 2050. The Resolution of Intent included specific measures that can further reduce greenhouse gas emissions. All new development is required to evaluate all reasonably feasible measures to reduce greenhouse gas emissions and enhance carbon sequestration. The project will not conflict with applicable goals, objectives, plans, policies, or regulations provided mitigation measures specified below are implemented.

Significance Level

Less than Significant with Mitigation Incorporated

Mitigation

Mitigation GHG-1: The applicant shall submit a Greenhouse Gas Reduction Plan for PRMD review and approval that defines measures to reduce greenhouse gas emissions in the design, construction,

and long-term operations of the project. The Greenhouse Gas Reduction Plan shall include all reasonably feasible measures to reduce greenhouse gas emissions to the maximum extent feasible. Measures that must be evaluated include but are not limited to best available conservation technologies for all energy and water uses, installation of renewable energy facilities to meet demand on-site, provisions of electric vehicle charging stations, bicycle facilities including secure bike parking, and lockers and showers for employees, employing best management practices for carbon sequestration, such as no till soils, reduced use of fertilizers, etc.

Monitoring GHG-1: Permit Sonoma staff shall ensure that the methods selected in the Greenhouse Gas Emissions Reduction Plan are listed on all site alteration, grading, building or improvement plans prior to issuance of grading or building permits. Building/grading permits shall not be approved for issuance by Project Review Staff until the Greenhouse Gas Reduction Plan has been approved and incorporated into the design and construction documents for the project.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Comment

Construction of the project may involve the intermittent transport, storage, use and disposal of potentially hazardous materials, including fuels and lubricants, paints, solvents, and other materials commonly used in construction. During construction activities, any on-site hazardous materials that may be used, stored, or transported would be required to follow standard protocols (as determined by the U.S. EPA, California Department of Health and Safety, and Sonoma County) for maintaining health and safety. Improper transit, storage, or handling of these materials could result in spills. This potential impact would be reduced to a less than significant level with implementation of standard approved construction methods for handling hazardous materials. Therefore, the potential environmental impact associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

Significance Level

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?**

Comment

Potential impacts related to construction and operational use of hazardous materials would be minimized through review and oversight of multiple jurisdictional entities requiring permits for use of hazardous materials, as described in 8.a. above. Therefore, the potential impact from accidents involving the use of hazardous materials would be less than significant.

Significance Level

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?**

Comment

The project does not involve the routine use or transport of hazardous materials and there are no schools within 0.25 miles.

Significance Level

Less than Significant

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

Comment

There are no known hazardous materials sites within or adjacent to the project limits, based on a review of the following databases on December 15, 2020:

1. The State Water Resources Control Board Geotracker database¹⁴,
2. The Department of Toxic Substances Control EnviroStor database¹⁵ (formerly known as Calsites), and
3. The Calrecycle Solid Waste Information System (SWIS)¹⁶.

The closest hazardous materials sites on record are several LUST (Leaking Underground Storage Tank) cleanup sites no closer than one-quarter mile from the project site. One of the nearest cleanup site cases was closed in 2004. EnviroStor listed a site approximately 0.30 miles northeast of the project ("Ecodyne Pond") that previously manufactured lumber and wood products. Between 1985 and 1998, PAHs, lead, and dioxin were identified in the soils at the site. A Remedial Action Plan (RAP) has since been developed and is in effect, with oversight by the State Department of Toxic Substances Control and North Coast Regional Water Quality Control Board. Due to the distance between this site and the project site, no impacts are expected.

Significance Level

No Impact

- 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?**

Comment

Charles M. Schulz – Sonoma County Airport is roughly 0.50 miles away from the project site. The site is within the Traffic Pattern Zone-B (TPZ-B), as designated by the Sonoma County Comprehensive Airport Land Use Plan, which has a maximum population density of 300 persons per acre. The project would have around 20 employees, and most operations would occur indoors except for the unloading and loading of product at the outdoor dock. Therefore the project would not expose warehouse employees to aircraft related safety hazards or excessive noise.

Significance Level

No Impact

¹⁴ State Water Resources Control Board Geotracker, "Geotracker", State of California, Accessed December 15, 2020, <https://geotracker.waterboards.ca.gov/>

¹⁵ Department of Toxic Substances Control Envirostor, "Envirostor", State of California, Accessed December 15, 2020, <https://www.envirostor.dtsc.ca.gov/public/>

¹⁶ CalRecycle, "Solid Waste Information System", Accessed December 15, 2020, <https://www2.calrecycle.ca.gov/SWFacilities/Directory/>

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

Comment

The project would not impair implementation of, or physically interfere with the County's adopted emergency operations plan. There is no separate emergency evacuation plan for the County. The project would not change existing circulation patterns, would not generate substantial new traffic, and therefore, would have no effect on emergency response routes. Refer to section 16 for a discussion of project traffic.

Significance Level

No Impact

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

Comment

According to the Wildland Fire Hazard Area map (Figure PS-1g) in the Sonoma County General Plan, the project site is located in the Local Responsibility Area, over 2 miles from a State Responsibility Area, and is designated as a Moderate Fire Hazard Severity Zone. Moderate Zones are generally located in grasslands and valleys, away from significant forested or chaparral wildland vegetation, as is the case with the project site. Projects located in High and Very High Fire Severity Zones are required by state and county code to have a detailed vegetation management plan developed and reviewed by the Sonoma County Fire Prevention Division before a building permit can be issued. This requirement does not apply to projects located in a Moderate Zone. However, all construction projects must comply with Sonoma County Fire Safety Ordinance (Chapter 13), with requirements such as installing fire sprinklers in buildings, providing emergency vehicle access, and maintaining a dedicated fire-fighting water supply on-site. Application of County standards reduces the project's potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires to a less than significant level.

Significance Level

Less than Significant

10. HYDROLOGY AND WATER QUALITY

Would the project:

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

Comment

Construction of the warehouse building and associated hardscape would result in grading and ground disturbance of 1.2 acres. Construction activities, completed improvements, and project operations could all affect the quantity and/or quality of stormwater runoff.

Site drainage occurs by sheet flow to the northwestern portion of the site. the south. Besides a depression in the northern portion of the sight, the site is generally flat. There are no immediate stream channels adjacent to the property; the closest drainage is 300 feet north of the project boundaries. However, a number of regulations could apply to the project, summarized below.

A construction project disturbing one or more acres of soil is required to obtain coverage under the State Water Resources Control Board (SWRCB) Construction General Permit Order 2009-0009-DWQ for Discharges of Storm Water Runoff Associated with Construction Activity¹⁷. Construction activities subject to this permit include clearing, grading, stockpiling, excavation, and reconstruction of existing facilities involving removal and replacement. The General Permit requires submittal of a Notice of Intent (NOI) package, and development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) which, in addition to other requirements, must include Best Management Practices (BMPs) to protect the quality of stormwater runoff.

Sonoma County also requires project applicants to prepare a grading and drainage plan (Erosion Prevention and Sediment Control Plan) in conformance with Chapter 11 (Construction Grading and Drainage Ordinance) and Chapter 11A (Storm Water Quality Ordinance) of the Sonoma County Code. The project would involve placement of more than 10,000 square feet of impervious surface area located in an area subject to the North Coast RWQCB Municipal Separate Storm Sewer Systems (MS4) Permit. Therefore, it must both meet the requirements of the Sonoma County Storm Water Quality Ordinance and incorporate Low Impact Development (LID) Best Management Practices (BMPs) contained in the City of Santa Rosa and County of Sonoma Storm Water Low Impact Development Technical Design Manual to address construction and post construction water quality requirements. Required inspections by Permit Sonoma staff ensure that all grading and erosion control measures are constructed according to the approved plans.

A Preliminary Stormwater Low Impact Development (SWLID) report¹⁸ was submitted with the project, then reviewed and approved by the Grading and Stormwater Division of Permit Sonoma. A final SWLID submittal will be required prior to issuance of grading or building permits, which will ensure the project will incorporate all LID BMPs.

All of the above requirements and adopted best management practices are specifically designed to maintain potential water quality impacts at a less than significant level during and post construction.

Significance Level

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?

Comment

The site is located in a Groundwater Availability Class 1 – Major Groundwater Basin, and is within the Santa Rosa Valley Priority basin defined under the Sustainable Groundwater Management Act (SGMA). However, the project does not rely on groundwater; municipal water service is provided by the Town of Windsor. The project will not capture precipitation or impede overland stormwater flows in a way that might interfere with groundwater recharge.

Significance Level

Less than Significant

¹⁷ State Water Resources Control Board, “2009-0009-DWQ CONSTRUCTION GENERAL PERMIT”, California Environmental Protection Agency, September 26, 2018, https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

¹⁸ Bartholomew, Paul V., “SWLID Report, Neilmed Warehouse, 685 Aviation Boulevard, Santa Rosa, CA”, Brelje & Race, December 20, 2019

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:

i. would result in substantial erosion or siltation on- or off-site?

Comment

There are no streams, drainage channels, or wetland features on the project site. Site drainage occurs by sheet flow to the northwest. Construction of the proposed project would involve cuts, fills, and other grading. Unregulated grading during construction has the potential to increase soil erosion from a site. Construction grading activities would be subject to a grading permit, which requires installation of adequate stormwater treatment measures to prevent soil erosion during construction, such as silt fencing, straw wattles, and soils discharge controls at construction site entrance(s). Compliance with the County grading regulations is aimed at capturing and treating all project runoff onsite, thereby reducing the potential for soil erosion and sediment delivery from the site. The ordinance requirements and BMPs are specifically designed to maintain water quantity and ensure erosion and siltation impacts are less than significant during and post construction.

Significance Level

Less than Significant

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

Comment

The project will increase the amount of impervious surface area on the site. Prior to grading or building permit issuance, construction details for all post-construction storm water Best Management Practices (BMPs) shall be submitted for review and approval by the Grading & Storm Water Section of Permit Sonoma. Post-construction storm water BMPs must be installed per approved plans and specifications, and working properly prior to finalizing the grading or building permits. They shall be designed and installed pursuant to the adopted Sonoma County Best Management Practice Guide. BMPs would prevent the alteration of site drainage, or increase in surface runoff and avoid flooding. Project Low Impact Development techniques would include limiting impervious surfaces, dispersing development over larger areas, and creation of storm water detentionment areas. Post construction storm water BMPs include filtering, settling, or removing pollutants. Through standard permitting requirements, potential flooding impacts are reduced to a less than significant level.

Significance Level

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

Comment

On-site construction would result in new impervious surface and generation of stormwater. Bioretention swales are proposed to manage stormwater drainage and retain all, if not most, stormwater on the site. The project would require a grading permit, which would not be issued until all required stormwater treatment options have been incorporated in compliance with all applicable standards of the County Code.

Significance Level

Less than Significant

iv. impede or redirect flood flows?

Comment

The site is not located in a 100-year flood plain where construction of new structures could impede or redirect flood flows.

Significance Level

No Impact

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

Comment

The project site is not located in a 100-year flood zone or Special Flood Hazard Area, as determined by the Federal Emergency Management Agency (FEMA). Nor is the site in an area subject to seiche or tsunami. A seiche is a wave in a large enclosed or partly enclosed body of water triggered by an earthquake. The project site is not located near enough to a large body of water or the coastline to be subject to earthquake-triggered waves.

Significance Level

No Impact

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

Comment

The project is subject to Chapter 11 (Construction Grading and Drainage Ordinance) and Chapter 11A (Storm Water Quality Ordinance) of the Sonoma County Code and the Sonoma County Storm Water Low Impact Development Guide, all of which include performance standards and Best Management Practices for pre-construction, construction, and post-construction to prevent and/or minimize the discharge of pollutants, including sediment, from the project site. The site is located within the Santa Rosa Valley Priority SGMA basin, an area that requires monitoring and reporting of groundwater use. However, the project does not rely on groundwater; municipal water service is provided by the Town of Windsor. The project will not impede or conflict with implementation of the Sonoma County Storm Water Low Impact Development Guidelines or the goals of the Sustainable Groundwater Management Act.

Significance Level

No Significant

11. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

Comment

The project would not physically divide a community. The project would not involve construction of a physical structure (such as a major transportation facility) or removal of a primary access route (such as a road or bridge) that would impair mobility within an established community or between a community and outlying areas. No impact would occur.

Significance Level

No Impact

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?

Comment

The General Plan Land Use designation is Limited Industrial and the Zoning District is MP (Industrial Park). The proposed warehouse use is compatible with General Plan policies and Zoning Code requirements for industrial areas. The project site is located within the boundaries of the Airport Industrial Area Specific Plan. It is not within a designated open space or scenic resource area, therefore, no such policies or regulations apply to the project. The site is located within a designated Valley Oak Habitat protection area. However, no valley oak habitat occurs on the parcel. By implementing the mitigation measures identified in this document, the project would not conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect.

Significance Level

No Impact

12. MINERAL RESOURCES

Would the project:

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

Comment

Sonoma County has adopted the Aggregate Resources Management Plan that identifies aggregate resources of statewide or regional significance (areas classified as MRZ-2 by the State Geologist). The project site is not located within a known mineral resource deposit area, according to the Sonoma County Aggregate Resources Management Plan, as amended in 2010.

Significance Level

No Impact

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?

Comment

The project site is not located within an area of locally-important mineral resource recovery site and the site is not zoned MR (Mineral Resources). No locally-important mineral resources are known to occur at the site.

Significance Level

No Impact

13. NOISE

Would the project:

- 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?**

Comment

County noise standards for non-transportation operational noise are provided in Table NE-2 of the General Plan (Table 3 below). These thresholds may be adjusted based on site-specific conditions, such as a very high or very low ambient noise level, specific types of noise (e.g., dog barking, simple tone noises), or short-term noise sources permitted to occur no more than six days per year (e.g., concerts, special events).

Table 2. Maximum Allowable Exterior Noise Exposures for Non-transportation Noise Sources

Hourly Noise Metric ¹ , dBA	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.)
L50 (30 minutes in any hour)	50	45
L25 (15 minutes in any hour)	55	50
L08 (4 minutes 48 seconds in any hour)	60	55
L02 (72 seconds in any hour)	65	60
¹ The sound level exceeded n% of the time in any hour. For example, the L50 is the value exceeded 50% of the time or 30 minutes in any hour; this is the median noise level.		

Sensitive receptors include hospitals, schools, convalescent facilities, and residential areas. The site is in the middle of the Airport Business Park, with no nearby residential areas, schools, or hospitals. No outdoor activities are allowed with this project with the exception of loading/unloading supplies and materials at the outdoor loading dock, which may involve the use of forklifts with backup alarms. Therefore, during project operations there would be temporary periods of relatively short duration where vehicle generated noise occurs when items are delivered to or removed from the warehouse. Hours of operation for the warehouses are 5:00am to 12:00 am. However, County standard project conditions of approval identify specific General Plan land use standards and require they be met, which would reduce these impacts to less than significant levels. No significant operational noise impacts are anticipated.

Neither the General Plan, nor the County Code establishes any noise thresholds or standards for temporary construction activities. Short-term construction activities would increase ambient noise levels at the project site and vicinity, but would subside once construction of the proposed project is completed. Mitigation Measure NOISE-1 would reduce the temporary construction noise impact to a less than significant level.

Significance Level

Less than Significant with Mitigation Incorporated

Mitigation

Mitigation Measure NOISE-1: All plans and specifications or construction plans shall include the following notes:

- a) All internal combustion engines used during construction of this project will be operated with mufflers that meet the requirements of the State Resources Code, and, where applicable, the Vehicle Code. Equipment shall be properly maintained and turned off when not in use.
- b) Except for actions taken to prevent an emergency, or to deal with an existing emergency, all construction activities shall be restricted to the hours of 7:00 a.m. and 7:00 p.m. (use this if no nearby receptors, or 5:00 pm if nearby receptors) on weekdays and 9:00 a.m. and 7:00 p.m. (same note as above) on weekends and holidays. If work outside the times specified above becomes necessary, the applicant shall notify the Permit Sonoma Project Review Division as soon as practical.
- c) There will be no start up of machines nor equipment prior to 7:00 a.m, Monday through Friday or 9:00 am on weekends and holidays; no delivery of materials or equipment prior to 7:00 a.m nor past 7:00 p.m, (same note as above) Monday through Friday or prior to 9:00 a.m. nor past 7:00 p.m. on weekends and holidays and no servicing of equipment past 7:00 p.m., Monday through Friday, or weekends and holidays. A sign(s) shall be posted on the site regarding the allowable hours of construction, and including the developer- and contractors mobile phone number for public contact 24 hours a day or during the hours outside of the restricted hours.
- d) Pile driving activities shall be limited to 7:30 a.m. to 7:00 p.m. weekdays only (same note as above).
- e) Construction maintenance, storage and staging areas for construction equipment shall avoid proximity to residential areas to the maximum extent practicable. Stationary construction equipment, such as compressors, mixers, etc., shall be placed away from residential areas and/or provided with acoustical shielding. Quiet construction equipment shall be used when possible.
- f) The developer shall designate a Project Manager with authority to implement the mitigation prior to issuance of a building/grading permit. The Project Managers 24-hour mobile phone number shall be conspicuously posted at the construction site. The Project Manager shall determine the cause of noise complaints (e.g. starting too early, faulty muffler, etc.) and shall take prompt action to correct the problem.

Monitoring

Monitoring NOISE-1: Permit Sonoma Project Review Division staff shall ensure that the measures are listed on all site alteration, grading, building or improvement plans, prior to issuance of grading or building permits. Permit Sonoma staff shall inspect the site prior to construction to assure that the signs are in place and the applicable phone numbers are correct. Any noise complaints will be investigated by Permit Sonoma staff. If violations are found, Permit Sonoma shall seek voluntary compliance from the permit holder, or may require a noise consultant to evaluate the problem and recommend corrective actions, and thereafter may initiate an enforcement action and/or revocation or modification proceedings, as appropriate.

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

Comment

The project would include construction activities that may generate minor ground borne vibration and noise from conventional construction equipment, but no intensive vibratory noise would occur, such as pile-driving. All construction noise would be short-term, temporary, and limited to daytime hours. There are no other activities or uses associated with the project that would expose persons to or generate excessive ground borne vibration or ground borne noise levels.

Significance Level

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?

Comment

The Charles M. Schluz-Sonoma County Airport is roughly a half-mile west of the site. The Sonoma County Comprehensive Airport Land Use Plan (CALUP) identifies warehousing as an acceptable or compatible land use near airport operations. The warehouse would have around 20 employees, and outdoor activities would be limited to loading/unloading of supplies.

Significance Level

Less than Significant Impact

14. POPULATION AND HOUSING

Would the project:

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

Comment

The proposed project does not propose new housing, nor would it generate significant new demand for housing in the area (20 employees are anticipated). This small increase in employment opportunities is not anticipated to result in an indirect increase in population as it is anticipated that employees would be existing residents of the Bay Area. No new major infrastructure is proposed. Therefore, the project would not induce substantial population growth.

Significance Level

Less than Significant

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

Comment

No housing would be displaced by the project and no replacement housing would be required.

Significance Level

No Impact

15. PUBLIC SERVICES

Would the project:

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

i. Fire protection?

Comment

The proposed project is within the service area of the Sonoma County Fire Protection District. The Sonoma County Protection District would continue to serve this area, and existing fire protection facilities are anticipated to be adequate. Sonoma County Code requires that all new development meet Fire Safe Standards (Chapter 13). The County Fire Marshal reviewed the project referral and provided conditions of approval to comply with Fire Safe Standards, including fire truck access improvements and fire protection methods such as sprinklers in buildings, alarm systems, extinguishers, vegetation management, hazardous materials management and management of flammable or combustible liquids and gases. None of the conditions required construction of new or expanded fire protection facilities. Therefore, the project would not necessitate or facilitate construction of new fire protection facilities in order to maintain acceptable service ratios or response times.

Significance Level

Less than Significant

ii. Police?

Comment

The Sonoma County Sheriff would continue to serve this area; existing sheriff protection facilities are anticipated to be adequate. The proposed project does not propose new housing. The estimated 20 new job opportunities would not be anticipated to result in a substantial number of new residents moving to the area and requiring police protection. Therefore, the project would not necessitate or facilitate construction of new police protection facilities resulting in environmental impacts in order to maintain acceptable service ratios or response times.

Significance Level

Less than Significant

iii. Schools?

Comment

Development fees to offset potential impacts to public services, including school fees, are required by Sonoma County Code and state law for new subdivisions and residential developments. The project does not involve residential development, and the estimated 20 new job opportunities would not be anticipated to result in a substantial number of new residents moving to the area and requiring additional school facilities. Therefore, the project would not necessitate or facilitate construction of new schools resulting in environmental impacts in order to maintain acceptable service ratios.

Significance Level

Less than Significant

iv. Parks?

Comment

Development fees to offset potential impacts to public services, including parks fees, are required by Sonoma County Code and state law for new subdivisions and residential developments. The project does not involve residential development, and the estimated 20 new job opportunities would not be anticipated to result in a substantial number of new residents moving to the area and requiring additional park facilities. Therefore, the project would not necessitate or facilitate construction of new parks resulting in environmental impacts in order to maintain acceptable service ratios.

Significance Level

Less than Significant

v. Other public facilities?

Comment

The project will connect to the Airport/Larkfield/Wikiup Sanitation District (Sonoma Water) for sewer service and the Town of Windsor for water. An estimated 20 employees for a dry goods warehouse is not anticipated to result in an increase in water demand or wastewater processing capacity requiring construction of new facilities. No other public facilities are anticipated to be required as a result of the project.

Significance Level

Less than Significant

16. RECREATION

Would the project:

- 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?**

Comment

The proposed project does not propose new housing, nor would it generate significant new demand for housing in the area (up to 20 new employees are anticipated). Therefore, the project would not cause or accelerate substantial physical deterioration of parks or recreational facilities, and would have no impact on the use of existing neighborhood and regional parks or other recreational facilities.

Significance Level

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?**

Comment

The project does not involve the construction or expansion of recreational facilities.

Significance Level

No Impact

17. TRANSPORTATION

Would the project:

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

Comment

The warehouse project is anticipated to require 20 employees. As proposed, it would house products that would be shipped from 551 Aviation Boulevard (under the same ownership), allowing local products to be stored nearby rather than trucked out of the area for storage. The project is therefore not expected to add truck traffic to the area because trips leaving the project warehouse would replace trips currently moving the products to storage facilities out of the area. However, for analysis purposes all trips were treated as new trips. A focused traffic study, dated December 28, 2020¹⁹ and prepared by W-Trans, found that the project is anticipated to generate 103 new vehicle trips per day, including 10 a.m. peak hour and 11 p.m. peak hour trips.

The Sonoma County General Plan includes objectives for maintaining an acceptable Level of Service (LOS) for the countywide roadway system. General Plan Objectives CT-4.1 and CT-4.2 define an acceptable Level of Service as LOS C or better for roadway segments, and LOS D or better at roadway intersections. The Traffic Impact Study for the Hyatt Place Sonoma Wine Country project²⁰ at 3750 North Laughlin Road, just south of Airport Boulevard, found that the five intersections on Airport Boulevard from US 101 North to North Laughlin Road-Skylane Boulevard are identified as operating at LOS C or better under existing condition. Under 2040 volumes, all the intersections are projected to operate at LOS C or better except for Airport Boulevard/N. Laughlin Road-Skylane Boulevard, which would operate at LOS F. However, this intersection is included on the County's list of locations that are planned to be signalized, and with a signal operation would improve to LOS C. Because LOS C operation is reasonably expected under Future volumes and was documented for existing conditions, the project will not conflict with the County's LOS objectives.

The nearest transit stop, located at Aviation Boulevard/Skylane Boulevard, is served by Sonoma County Transit Route 62, which runs to Windsor Depot to the north and Santa Rosa Transit Mall to the south. The buses for this route are currently operating on their weekday schedule with service from approximately 7:30 a.m. to 7:45 p.m. with headways of one to two hours. The transit stop is within one-quarter of a mile walking distance, which is considered a "walkable" distance. Existing transit facilities are adequate to accommodate the project.

Bicycle lanes do not currently exist on Aviation Boulevard or Skylane Boulevard. However, the 2010 Sonoma County Bicycle and Pedestrian Plan proposes a Class II bike lane along the Skylane Boulevard. This project would not interfere or conflict with the proposed bike lane. The project proposes 7 bicycle parking spaces to encourage bicycle transportation in the future.

Sidewalks do not currently exist along the frontage Aviation Boulevard, off of where the project site is located. Given the lack of sidewalk on Aviation Boulevard and on other frontages abutting the private driveway leading to the project site, coupled with the lack of pedestrian destinations, the installation of sidewalks is not warranted.

¹⁹ Kim, Jade and Dalene J. Whitlock, "Focused Traffic Study for the 685 Aviation Boulevard Project", W-Trans, December 28, 2020

²⁰ Whitlock, J., Dalene, "Traffic Impact Study for the Hyatt Place Sonoma Wine Country", W-Trans, April 29, 2020

Significance Level

Less than Significant

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Comment

Pursuant to CEQA Guidelines Section 15064.3, subdivision (b), and applicable starting July 1, 2020, Vehicle Miles Traveled (VMT) is now the appropriate metric to evaluate transportation impacts of land use projects, superseding use of the measure of traffic congestion (i.e. Level of Service). To assist with implementation of the new CEQA practice, the Sonoma County Transportation Agency (SCTA) is in the process of developing screening and modeling tools for local jurisdictions. In the interim, the Technical Advisory provided by the Governor's Office of Planning and Research offers a threshold to screen out smaller projects from further analysis. Absent substantial evidence otherwise or inconsistency with a general plan, 110 daily vehicle trips may be assumed to have a less than significant transportation impact²¹.

A focused traffic study, dated December 28, 2020 and prepared by W-Trans, found that the project is anticipated to generate 103 new vehicle trips per day, including 10 a.m. peak hour and 11 p.m. peak hour trips²². Additionally, many of these trips are expected to have a very short length associated with trucks carrying finished goods between the production and storage facilities. Because 103 trips is below the screening threshold, the project is consistent with the General Plan, including Level of Service objectives, and there is no other evidence suggesting otherwise, the project is anticipated to have a less than significant impact on vehicle miles traveled.

Significance Level

Less than Significant

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

Comment

The project would not increase hazards because it does not modify alignment of existing public roadways. Brelje & Race prepared an exhibit²³ demonstrating the possible turning movements and circulation of trucks visiting the project site. Trucks will access the site from the private driveway off of Aviation Boulevard, turn to the east and then back into the loading dock. On departure, they can pull ahead and continue along the private driveway east to Brickway Boulevard. All warehouse activities would take place inside the parcel interior. No equipment would impact public roads, except for temporary construction-related vehicle impacts, which would cease upon completion of project construction and would be considered a less than significant impact.

Significance Level

Less than Significant Impact

d) Result in inadequate emergency access?

²¹ Governor's Office of Planning and Research, "Technical Advisory on Evaluating Transportation Impacts in CEQA", State of California, December 2018

²² Kim, Jade and Dalene J. Whitlock, "Focused Traffic Study for the 685 Aviation Boulevard Project", W-Trans, December 28, 2020

²³ "Windsor Fire Truck Turning Template", Brelje & Race, August 9, 2018

Comment

Emergency vehicles can access the project site through the driveway coming from Aviation Boulevard. Brelje & Race prepared an emergency vehicle turnaround exhibit²⁴ demonstrating that onsite circulation can accommodate the turning movements of a standard sized emergency vehicle.

Significance Level

Less than Significant

f) Result in inadequate parking capacity?

Comment

The Sonoma County Zoning Code requires one parking space per 2000 square feet of warehouse space, and one space per 250 square feet. The project is a 59,066 square-foot warehouse with 500 square feet of the total reserved as office space, therefore 32 spaces are required.

The development would have 43 spaces onsite. Fourteen of those spaces are shared with the property to the south, therefore 29 would specifically be designated for onsite uses. The Sonoma County Design Review Committee has provided preliminary approval for a minor reduction in required parking of up to 20 percent due to the project's provision of two electric vehicle charging stations, and three spaces reserved for clean air or vanpool vehicles. A minimum of 26 spaces would be required after the reduction, which the project meets. Further, it is assumed that some of the 14 shared spaces will be available for onsite needs.

Significance Level

No Impact

18. TRIBAL CULTURAL RESOURCES

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

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5030.1(k), or

Comment

As discussed in section 5(a), Tom Origer & Associates conducted a cultural resources evaluation of the project site²⁵. There are no known resources on site, but construction related to the project could uncover such materials. Mitigation Measure CUL-1 will reduce potential impacts to less than significant.

Significance Level

Less than Significant with Mitigation Incorporated

²⁴ "WB-65 Truck Turning Template", Brelje & Race, March 21, 2019

²⁵ Marella, Elena, B.A. and Thomas M. Origer, M.A., "Cultural Resources Study of the Property at 685 Aviation Boulevard, Santa Rosa, Sonoma County, California", Tom Origer and Associates, December 20, 2019

Mitigation

See Mitigation Measure and Monitoring CUL-1

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

Comment

See section 5 and section 18(a)(i). Mitigation Measure CUL-1 will reduce potential impacts to less than significant.

Significance Level

Less than Significant with Mitigation Incorporated

Mitigation

See Mitigation Measure and Monitoring CUL-1

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Comment

All services are already present at the project site. Existing buildings in the business park are already served by Town of Windsor water and the Airport/Larkfield/Wikiup Sanitation District, electrical power through various providers, and telecommunications. No expansion of any public services would be required.

Significance Level

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?**

Comment

Sufficient water would be provided by the Town of Windsor. The Town of Windsor has issued conditions of approval requiring measures for water efficiency. No water supply issues are anticipated.

Significance Level

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?**

Comment

The project would be served by the Airport/Larkfield/Wikiup Sanitation District (Sonoma Water). The project was referred to Sonoma Water, which provided conditions of approval for the project's sewer connection. One of the conditions requires a "Sewer Capacity Study" prior to building permit issuance if determined necessary by Sonoma Water. For a dry goods warehouse with 20 employees, sewer capacity issues are not anticipated.

Significance Level

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?**

Comment

Sonoma County has a solid waste management program in place that provides solid waste collection and disposal services for the entire County. The program can accommodate the permitted collection and disposal of the solid waste that would result from the proposed project.

Significance Level

Less than Significant

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

Comment

No applicable federal solid waste regulations would apply to the project. At the State level, the Integrated Waste Management Act mandates a reduction of waste being disposed and establishes an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. Sonoma County has access to adequate permitted landfill capacity and reduction, reuse, and recycling programs to serve the proposed project. Construction and operational waste generated as a result of the project would require management and disposal in compliance with local and state regulations. The project would not conflict with implementation of such programs.

Significance Level

Less than Significant

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:

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

Comment

The project site is not located in or within 2 miles of the State Responsibility Area or a High Fire Hazard Severity Zone. The project is located in a Moderate Fire Hazard Severity Zone within a developed industrial area near the city limits of Windsor. No significant impacts related to wildfire are anticipated.

Significance Level

No Impact

- 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?**

Comment

The project site is not located in or within 2 miles of the State Responsibility Area or a High Fire Hazard Severity Zone. The project is located in a Moderate Fire Hazard Severity Zone within a developed industrial area near the city limits of Windsor. No significant impacts related to wildfire are anticipated.

Significance Level

No Impact

- 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 of that may result in temporary or ongoing impacts to the environment?**

Comment

The project site is not located in or within 2 miles of the State Responsibility Area or a High Fire Hazard Severity Zone. The project is located in a Moderate Fire Hazard Severity Zone within a developed industrial area near the city limits of Windsor. No significant impacts related to wildfire are anticipated.

Significance Level

No Impact

- 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?**

Comment

The project site is not located in or within 2 miles of the State Responsibility Area or a High Fire Hazard Severity Zone. The project is located in a Moderate Fire Hazard Severity Zone within a developed industrial area near the city limits of Windsor. No significant impacts related to wildfire are anticipated.

Significance Level

No Impact

21. MANDATORY FINDINGS OF SIGNIFICANCE

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

Comment

Potential project impacts to special status plant and wildlife species and habitat are addressed in Section 4 with Mitigation Measures BIO-1 through 3. Potential adverse project impacts to cultural and tribal resources are addressed in section 5 and 18. Implementation of the required mitigation measures will reduce potential impacts to a less than significant level. Potentially significant impacts to air quality, greenhouse gas emissions, and noise are reduced to a less than significant level

through implementation of Mitigation Measures AIR-1, GHG-1, and NOISE-1.

Significance Level

Less than Significant with Mitigation Incorporated

Mitigation

See Mitigation Measures and Monitoring AIR-1, BIO-1 through 3, CUL-1, GHG-1, and NOISE-1.

- 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)?**

Comment

The project would contribute to potential cumulative impacts related to air quality, greenhouse gases, biological resources, cultural resources, noise, and tribal resources. However, no individual project impacts have been identified in this Initial Study that are cumulatively considerable because the impacts of the project and project specific mitigation measures, when considered with past, other current, and probable future projects, would reduce cumulative impacts to less than significant in accordance with the General Plan.

Significance Level

Less than Significant with Mitigation Incorporated

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

Comment

The proposed project has some potential to cause adverse impacts on human beings, both directly and indirectly. However, all potential impact and adverse effects on humans were analyzed, and would be less than significant with the mitigation measures identified in the Initial Study incorporated into the project.

Significance Level

Less than Significant with Mitigation Incorporated

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