Proposed Mitigated Negative Declaration

Sonoma County Permit and Resource Management Department
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Publication Date:	February 27, 2023
Public Review Period:	30 days
State Clearinghouse Number:	(TBD)
Permit Sonoma File Number:	DRH21-0009
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Pursuant to Section 15071 of the State CEQA Guidelines, this proposed Negative Declaration and the attached Initial Study, constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

PROJECT DATA

Project Name:	LogistiCenter at Brickway
Project Applicant:	Dermody Properties on behalf of DPIF3 CA 33 Santa Rosa, LLC
Project Address:	3701 Brickway Boulevard, Santa Rosa
APN:	059-250-051, 059-250-052, and 059-250-053
General Plan Land Use:	Limited Industrial (LI)
Zoning Designation:	MP 2 AC AVG (Industrial Park, 2-acre average lot size); VOH (Valley Oak Habitat Combining District)
Decision Making Body:	Design Review Committee
Appeal Body:	Planning Commission
Project Description:	Proposed construction of a 129,200-square-foot new distribution warehouse building with 6,460 square feet of office space, 44 docking bays, and 94 parking spaces located within the Airport Industrial Park area on three parcels totaling 8.45 acres See Item III below for full description

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 Environmental Factors

Environmental Factors	Abrv.	Yes	No
1. Aesthetics	VIS		X
2. Agricultural & Forest Resources	AGR		X
3. Air Quality	AIR	X	
4. Biological Resources	BIO	X	
5. Cultural Resources	CUL		X

Environmental Factors (Continued)	Abrv.	Yes	No
6. Geology and Soils	GEO		X
7. Greenhouse Gas Emission	GHG		X
8. Hazards and Hazardous Materials	HAZ		X
9. Hydrology and Water Quality	HYD		X
10. Hydrology and Water Quality	HYD		X
11. Land Use and Planning	LUP		X
12. Mineral Resources	MIN		X
13. Noise	NOI	X	
14. Population and Housing	POP		X
15. Public Services	PUB		X
16. Recreation	REC		X
17. Transportation and Traffic	TRA	X	
18. Tribal Resources	TRI		X
19. Utilities and Service Systems	UTL		X
20. Wildfire	FIRE		X
21. Mandatory Findings of Significance			

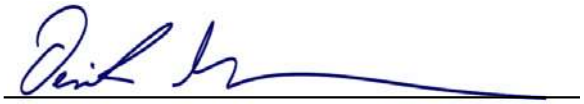
RESPONSIBLE AND TRUSTEE AGENCIES

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

Agency	Activity	Authorization
U. S. Army Corps of Engineers	Dredge or fill potential on US waters / wetlands	Clean Water Act, Section 401 Rivers and Harbors Act, Section 106
Regional Water Quality Control Board (North Coast)	Discharge or potential discharge to State waters Wetland dredge or fill	California Clean Water Act (Porter Cologne) – Waste Discharge requirements, general permit or waiver Clean Water Act, Section 404
State Water Resources Control Board	Generating stormwater	National Pollutant Discharge Elimination System (NPDES)
California Department of Fish and Wildlife	Incidental take permit for listed species	California Endangered Species Act
Bay Area Air Quality Management District (BAAQMD)	Stationary air emissions	BAAQMD Rules and Regulations (Regulation 2, Rule 1 – General Requirements, 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
Northern Sonoma County Air Pollution Control District (NSCAPCD)	Stationary air emissions	
State Division of Aeronautics	Construction in airport safety zone	FAA Form 7460 letter of compliance

ENVIRONMENTAL FINDING:

Based on the evaluation in the attached Initial Study, I find that the project described above could not have a significant effect on the environment, and a Negative Declaration is proposed. Based on the evaluation in the attached Expanded 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 included as conditions of approval for the project and a Mitigated Negative Declaration is proposed. The applicant has agreed to incorporate identified mitigation measures into the project.



Prepared by:
Derik Michaelson, Planner III

February 24, 2023
Date

I. INTRODUCTION:

Dermody Properties on behalf of DPIF3 CA 33 Santa Rosa, LLC. Proposes to redevelop three parcels totaling 8.45-acres that were once part of the old Santa Rosa Army Airfield with a Class-A type industrial use consisting of a new, single-story industrial warehouse building. The building would consist of concrete tilt-up construction with an exterior height of approximately 40 feet. The building would have a footprint of 129,200 square feet including about 122,740 square feet of warehouse space and approximately 6,460 square feet of offices located within the northeast and northwest portions of the proposed building.

The project site was originally part of the old Santa Rosa Army Airfield, which operated from 1942 until it was decommissioned in 1947. The project site at one time had structures located on it associated with the Santa Rosa Army Airfield (i.,e., a chapel and barracks). The RWQCB and Department of Toxic Substances Control (DTSC) conducted multiple investigations of the old military base, in conjunction with the United States military. A site-wide closure letter was issued by the RWQCB in April 2006, indicating that no further action was required.

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 Environment al Quality Act (CEQA). The report was prepared by Derik Michaelson, Project Review Planner with the Sonoma County Permit and Resource Management Department, Project Review Division. Information on the project was provided by Dermody Properties on behalf of DPIF3 CA 33 Santa Rosa, LLC. This initial study provides analysis and conclusions based on technical studies (see Section VIII. References) submitted by qualified consultants to support the conclusions in this Initial Study.

These studies are available for review at the Permit and Resource Management Department (Permit Sonoma) office, and available for download at the following site: _____ For more information, please contact the Project Planner, Derik Michaelson at (707) 565-3095,or via email at derik.michaelson@sonoma-county.org.

II. EXISTING FACILITY

The approximately 8.45-acre project site consists of three parcels (APNs 059-250-051, 059-250-052, and 059-250-053) located at the northwest intersection of Brickway Boulevard and Copperhill Parkway in Sonoma County, California. The project site is currently undeveloped and has been graded, disked, and filled in multiple locations. The site is bordered by commercial development to the north and west, Brickway Boulevard to the east, Copperhill Parkway to the south. Figures 1 and 2 show the project's regional location and the project site vicinity.

III. PROJECT DESCRIPTION

The project applicant proposes to redevelop the 8.45-acre site with a new, approximately 129,200-square-foot, single-story industrial warehouse building. Proposed project elements are described in further detail below. Figure 1 shows the overall site plan, including the proposed building and associated infrastructure (e.g., driveways, internal roadways).

Building Program

The building would consist of concrete tilt-up construction with an exterior height of approximately 40 feet. The building would include approximately 122,740 square feet of warehouse space and approximately

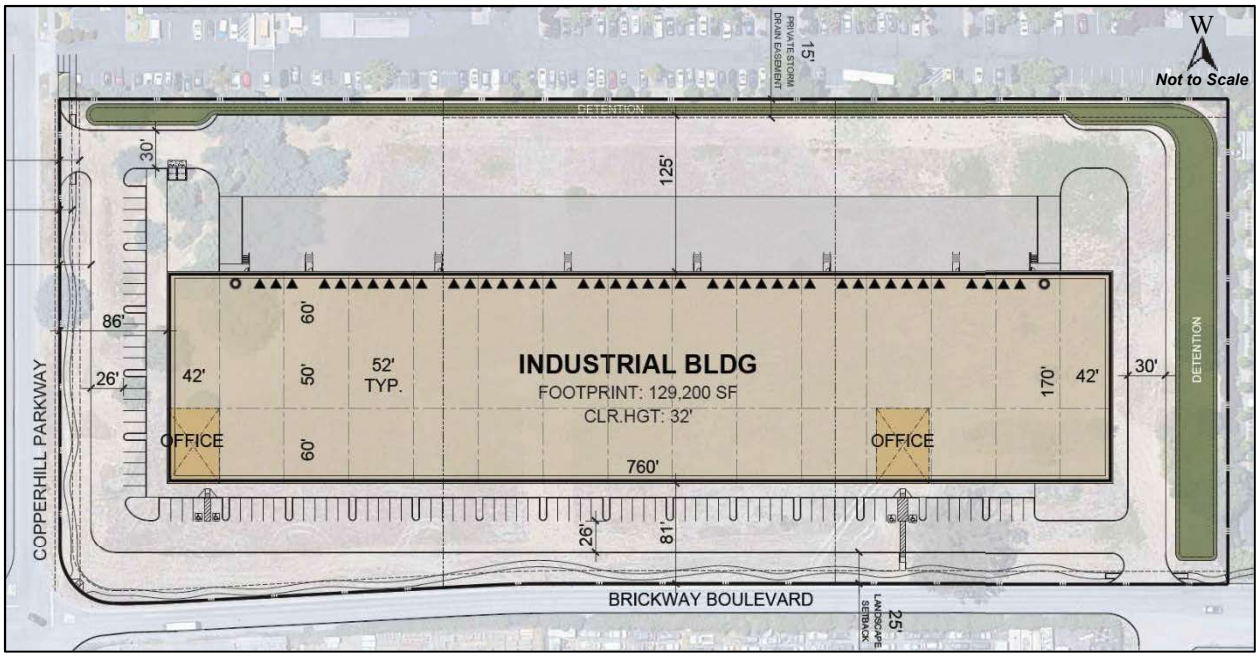


Figure 1: Project Site Plan

6,460 square feet of office space within the northeast and northwest portions of the proposed building. The proposed project would include a solar-ready roof and would be Leadership in Energy and Environmental Design (LEED) certified and in compliance with Title 24 and CalGreen requirements. In addition, the proposed project would include a 107-horsepower (HP) diesel fire pump that would be tested 20 minutes per week.

The proposed Floor Area Ratio (FAR) would be 0.35 and the building would be set back 80 feet from the property line. With this setback, the allowed building height is 48 feet (28 feet plus 6 inches for every foot of additional setback beyond 40 feet). With the proposed building height at 40 feet, the building as proposed would be within the allowed height.

Dock-high and grade-level doors are proposed along the western side of the building. At-grade automobile and trailer parking and drive aisles would be provided around the perimeter of the building.

Access and Parking

Proposed improvements would include installation of two access driveways on opposite corners of the project site. From the access driveways, vehicular traffic would be separated with automobile traffic directed towards a designated drive aisle for employee and customer automobile parking facing the street frontages. Warehouse and distribution truck traffic would be directed toward the back of the project site in a simple L-pattern to minimize the number of turns required. This layout would provide continuous fire access around the building, but separate automobile and truck traffic, and keep trucks away from pedestrian circulation areas (e.g., crosswalks, sidewalks).

Consistent with Sonoma County requirements, the proposed project would provide a total of 94 parking stalls, as shown below.

Required Parking		
Warehouse – 122,740 SF	1 / 2,000 SF	62 stalls required
Office – 6,460 SF	3 / 1,000 SF	20 stalls required
Total Parking Required	**---**	**82 stalls required**
Total Parking Provided	**---**	**94 stalls (provided)**

Sewer and Water
The Sonoma County Water Agency operates the Airport/Larkfield/Wikiup Sanitation District and will provide sanitation service to the project conforming to Commercial/Industrial Wastewater Discharge Requirements. The Town of Windsor Water District will provide the project with public water service with an approved Water Permit Application.

Landscaping and Pedestrian Improvements
Landscape would be provided in accordance with the Sonoma County zoning code and Airport Industrial Specific Plan requirements. Emphasis is placed on landscape facing street frontages, trees along property lines, and trees along parking areas to provide required shading. In addition, the project would construct a meandering sidewalk on Brickway Boulevard and Copperhill Parkway to connect to the existing meandering sidewalks and complete pedestrian circulation within this portion of the existing industrial park.

Proposed Operation
The project would result in the construction of a spec building that would be configured for light industrial uses by tenants that have not been identified. The applicant estimates that upon lease of the property, the site could operate continuously (24 hours per day) and could support approximately 75 employees.

Construction Activities
Construction of the proposed project would be completed in one phase. The estimated duration for construction activities is approximately 280 days. The proposed project would not require any soil import or export.

IV. SETTING

The approximately 8.45-acre project site is located within the Charles M. Schulz-Sonoma County Airport Industrial Area and located within the boundaries of the Sonoma County Airport Industrial Area Specific Plan. The project is located at 3701 Brickway Boulevard, Santa Rosa, and consists of three adjacent parcels, bounded by Copperhill Parkway on the south and Brickway Boulevard on the east. The project site is currently undeveloped. The site is located in an area characterized by industrial and commercial development (e.g., office buildings and warehouses with associated parking areas, streets, and loading docks) intended to serve the County's short-and long-term requirements for industrial development. Historically, the site was part of the old Santa Rosa Army Airfield, which operated from 1942 until it was decommissioned in 1947. The project parcel is zoned Industrial Park (MP 2 AC AVG) and Valley Oak Habitat Combining District (VOH).

The project site has been graded, disked, and filled in multiple locations. Therefore, the natural undulating topography that historically occurred on the Santa Rosa Plain no longer exists on the site. There is a low rise near the boundary of parcels -051 and -052 that establishes a hydrological divide between the northern and southern ends of the project site. Elevations range from approximately 125 feet National Geodetic Vertical Datum (NGVD) at the drainage divide to approximately 115 feet NGVD at the lowest point. A mound of fill material with an elevation of approximately 120 feet occurs at the extreme northern end of the site.

The project site consists largely of ruderal grasslands dominated by non-native annual and perennial grasses. A large stand (approximately 15,000 square feet) of ornamental non-native acacia trees (*Acacia verticillata*) occurs in the southwest corner of the site. Native trees on the site include two cottonwoods (*Populus fremontii*), and several valley oaks (*Quercus lobata*) and coast live oaks (*Quercus agrifolia*). One large blue gum eucalyptus (*Eucalyptus globulus*) occurs on the eastern boundary of the site along Brickway Boulevard. Small stands of Himalayan blackberry (also occur on site.

Wetlands have been mapped in the northern and southern portions of the project site. To the north of the drainage divide, drainage flows northerly toward a seasonal wetland located near the northern boundary of the project site and ultimately into a municipal storm drain inlet in the property's northwest corner. South of the drainage divide, surface drainage flows southwesterly into seasonal wetlands along

Copperhill Parkway and thence into a municipal storm drain inlet along the Parkway curb. Two storm drain inlets also occur along Brickway Boulevard on the eastern edge of the site.

V. ISSUES RAISED BY THE PUBLIC OR AGENCIES

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.

VI. OTHER RELATED PROJECTS

Permit Sonoma is currently processing another Design Review application (DRH22-0007) for a warehouse proposal on a site located within 0.5 miles of the project site. The other application proposes a 106,465-square-foot warehouse building on a 4.92-acre undeveloped parcel to the north of the project on Aviation Boulevard. The proposed building is to supplement the storage demands of an existing pharmaceutical business located on the adjacent parcel. Preliminary traffic analysis for the proposed building indicates 182 daily truck trips, with 18 to 19 trips occurring during peak morning and evening hours. The project is currently under review by Permit Sonoma.

VII. 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.

Less Than Significant with Mitigation Incorporated: 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.

Dermody Properties on behalf of DPIF3 CA 33 Santa Rosa, LLC. 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 and 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.

VIII. REFERENCES

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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:
According to Figure OSRC-1, Scenic Resource Areas in the Sonoma County General Plan 2020 (2008), the project site is not located within an area designated as a Scenic Landscape Unit, Scenic Corridor or Community Separator. U.S 101 located east of the site and River Road to the south of the site are designated as Scenic Corridors. The project site is not visible from either of these scenic corridors. The project site is relatively flat and the surrounding area is developed with commercial/ industrial land uses allowing for limited views of the surrounding landscape.

The proposed project would develop the project site with a light industrial building with office uses, a parking area, and landscaping. The proposed project would include new perimeter landscaping around the entire site, shielding the proposed building and improving the site's overall visual appearance. In addition, the character of the proposed building would be similar to the existing surrounding industrial uses and would be consistent with the surrounding architectural styles and intensities. Therefore, public views of the project site from surrounding areas would generally blend with surrounding urban development. The proposed project would not result in a substantial adverse effect on a scenic vista and this impact would be less than significant.

Significance Level:
Less Than Significant

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

Comment:
The project site is not located near a State scenic highway and would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway. The site includes several valley oak trees which are proposed to be removed. The project proposes street trees along both Brickway Boulevard and Copperhill Parkway that will enhance the aesthetic setting of the project site. Because the project is not adjacent to or within a designated State scenic highway, there would be no impact related to this topic and no mitigation is required.

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:
Construction of the proposed project would alter the visual character of the project site by removing existing native and non-native trees and constructing an approximately 129,200-square-foot, 40-foot-tall light industrial building with associated landscaping and parking. The character of the proposed building would be similar to the existing surrounding industrial uses and would be consistent with the surrounding architectural styles and intensities. The building would be set back at least 80 feet from both Brickway Boulevard and Copperhill Parkway.

In addition, the project proposes to install new landscaping along the perimeter of the site, shielding the proposed building, compensating for trees

to be removed, and improving the site's overall visual appearance.

Following County Visual Assessment Guidelines, the site sensitivity of the project site would be Low, which is a category applied to urban land use designations with no additional scenic resources protection designations, such as a Scenic Corridor. As described above, the building would be set back a minimum of 80 feet from the public rights of way in proximity to the project. The proposed project structures would be visible from these public vantage points (Brickway Boulevard and Copperhill Parkway), but would be consistent with other industrial development in the project vicinity. Therefore, the visual dominance would be Co-Dominant, applied when proposed project elements are moderate; the project elements can be prominent within the stetting, but attract attention equally with other landscape features. The form, line, color, texture, and night lighting are compatible with the surroundings. Based on the project site's Low visual sensitivity and the proposed project's Co-Dominant visual dominance, the project would be considered to have a less than significant effect on the existing visual character or quality of the site and its surroundings, as shown in the table below.

Table 1: Thresholds of Significance for Visual Impact Analysis

Sensitivity	Visual Dominance			
	Dominant	**Co-Dominant**	**Subordinate**	**Subordinate**
Maximum	Significant	Significant	Significant	Less-Than-Significant
High	Significant	Significant	Less-Than-Significant	Less-Than-Significant
Moderate	Significant	Less-Than-Significant	Less-Than-Significant	Less-Than-Significant
Low	Less-Than-Significant	Less-Than-Significant	Less-Than-Significant	Less-Than-Significant

Source: Sonoma, County of. Visual Impact Assessment Guidelines.

The proposed project would be consistent with the uses planned for the project site by the Sonoma County General Plan 2020 and the Sonoma County Airport Industrial Area Specific Plan and would be compatible with other buildings in the area. The proposed project would not substantially degrade the existing visual character or quality of the site or its surroundings. Therefore, impacts to the existing visual character or quality of the site would be 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 view in the area?

Comment:
The project site is located in an urbanized area, which is subject to preexisting exterior lighting from surrounding development and existing street lighting. The proposed project would introduce new sources of light and glare to the area in the form of new windows and exterior safety and security lighting. However, new sources of light and glare associated with the project would not be substantial in the context of existing lighting sources. In addition, daytime glare would not be substantial because no highly-reflective glass elements are proposed as part of the project.

According to the photometric study provided with the project plans, proposed lights would be mounted on the building and onsite light poles to maintain safe light levels throughout the site (e.g., 2.5 footcandles [fc] at parking and drive areas, and 3.0 fc at pedestrian areas). Lights around the perimeter of the project site would be aimed inwards and away from the property line to maintain low light levels at the site perimeter (e.g., 0.0 to 0.1 fc), as shown in the photometric study. In addition, County development and zoning standards require conditions of approval which require that all exterior lighting consist of fully shielded, downward-facing fixtures. Compliance with the Sonoma County Building Code and other regulatory requirements would ensure that light and glare impacts from the proposed project would 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 site is designated as "Farmland of Local Importance" on maps prepared by the California Depart of Conservation Farmland Mapping and Monitoring Program (FMMP).[1] Farmland of Local Importance includes land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. The project site is located within an existing urban area and is designated for Limited Industrial use in the Sonoma County General Plan 2020. It is not currently in agricultural production. Therefore, the proposed project would not impact farmland of local importance or convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. This impact would be less than significant.

Significance Level:
Less Than Significant

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

Comment:
The project site is designated Limited Industrial (LI) in the Sonoma County General Plan 2020 and is zoned Industrial Park (MP2 AC AVG) with Valley Oak Habitat Combining District (VOH). The project site is not subject to a Williamson Act contract.[2] Therefore, development of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and the proposed project would have no impact.

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 located within an existing urban area and is designated for Limited Industrial use in the Sonoma County General Plan 2020. No forest land or timberland is on or near the project site,

[1] California, State of, Department of Conservation. 2016. California Important Farmland Finder. Website: maps.conservation.ca.gov/dlrp/ciff (accessed July 22, 2022).
[2] Sonoma, County of. 2020. Zoning & Parcel Report. Website: https://parcelsearch.permitsonoma.org/ParcelSearch (accessed July 22, 2022)

and the project site is not zoned for forest or timber use. The project is not located on forest land or timberland, and would not conflict with existing zoning, or cause rezoning of, forest land, timberland, or timberland zoned for Timberland Production. Therefore, implementation of the project would not result in any impacts to forestland.

Significance Level:
No Impact

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

Comment:
The project is not located on forest land or timberland, and would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned for Timberland Production. Implementation of the project would not result in any impacts to forestland.

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:
Please refer to Sections 2.a and 2.c. The project site is located within an existing urban environment and would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. The proposed project would not adversely affect agricultural or forestry resources and there would be no impact.

Significance Level:
Less Than Significant

3. AIR QUALITY:

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

This section has been prepared based on the analysis conducted for the Air Quality and Greenhouse Gas Emissions Analysis[3] memorandum for the LogistiCenter at Santa Rosa Project prepared by LSA dated April 21, 2022. This memorandum was prepared using methods and assumptions recommended by the Bay Area Air Quality Management District (BAAQMD)[4] and is provided as a stand-alone document under a separate cover.

Would the project:

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

Comment:
The applicable air quality plan is the BAAQMD 2017 Clean Air Plan (Clean Air Plan), which defines control strategies to reduce emissions and ambient concentrations of air pollutants; safeguard public health by reducing exposure to air pollutants that pose the greatest heath risk, with an emphasis on protecting the communities most heavily affected by air pollution; and reduce GHG emissions to protect the climate. Consistency with the Clean Air Plan can be determined if the project: (1) supports

[3] LSA. 2022. *Air Quality and Greenhouse Gas Emissions Analysis*. April 21.
[4] Bay Area Air Quality Management District (BAAQMD). 2017. *California Environmental Quality Act, Air Quality Guidelines*. May.

the goals of the Clean Air Plan; (2) includes applicable control measures from the Clean Air Plan; and (3) would not disrupt or hinder implementation of any control measures from the Clean Air Plan. The primary goals of the Bay Area Clean Air Plan are to: attain air quality standards; reduce population exposure and protect public health in the Bay Area; and reduce greenhouse gas emissions and protect climate.

The BAAQMD has established significance thresholds for project construction and operational impacts at a level at which the cumulative impact of exceeding these thresholds would have an adverse impact on the region's attainment of air quality standards. The health and hazards thresholds were established to help protect public health. As discussed below, construction and operation of the proposed project would not result in the generation of criteria air pollutants that would exceed BAAQMD thresholds of significance. Therefore, the proposed project would not conflict with the Clean Air Plan goals.

The control strategies of the Clean Air Plan include measures in the following categories: Stationary Source Measures, Transportation Measures, Energy Measures, Building Measures, Agriculture Measures, Natural and Working Lands Measures, Waste Management Measures, Water Measures, and Super-GHG Pollutants Measures. The proposed project's compliance with each of these control measures is discussed below.

- Stationary Source Control Measures. The Stationary Source Control Measures, which are designed to reduce emissions from stationary sources such as metal melting facilities, cement kilns, refineries, and glass furnaces, are incorporated into rules adopted by the BAAQMD and then enforced by the BAAQMD Permit and Inspection programs. Since the proposed project would not include any of these stationary sources, the Stationary Source Control Measures of the Clean Air Plan are not applicable to the proposed project.

- Transportation Control Measures. The BAAQMD identifies Transportation Control Measures as part of the Clean Air Plan to decrease emissions of criteria pollutants, toxic air contaminants (TACs), and GHGs by reducing demand for motor vehicle travel, promoting efficient vehicles and transit service, decarbonizing transportation fuels, and electrifying motor vehicles and equipment. Based on the proposed project's trip generation, the proposed project is not expected to generate a substantial amount of daily trips or vehicle miles traveled. As such, the proposed project would not hinder the BAAQMD's initiatives to reduce vehicle trips and vehicle miles traveled and would increase the use of alternate means of transportation. Therefore, the proposed project would not conflict with the identified Transportation and Mobile Source Control Measures of the Clean Air Plan.

- Energy Control Measures. The Clean Air Plan also includes Energy Control Measures, which are designed to reduce emissions of criteria air pollutants, TACs, and GHGs by decreasing the amount of electricity consumed in the Bay Area, as well as decreasing the carbon intensity of the electricity used by switching to less GHG-intensive fuel sources for electricity generation. Since these measures apply to electrical utility providers and local government agencies (and not individual projects), the energy control measures of the Clean Air Plan are not applicable to the proposed project.

- Building Control Measures. The BAAQMD has authority to regulate emissions from certain sources in buildings such as boilers and water heaters but has limited authority to regulate buildings themselves. Therefore, the strategies in the control measures for this sector focus on working with local governments that do have authority over local building codes, to facilitate adoption of best GHG control practices and policies. The proposed project would be required to comply with the latest Title 24 standards of the California Code of Regulations, established by the California Energy Commission (CEC), regarding energy conservation and green building standards. In addition, the proposed project would include a solar-ready roof and would be LEED certified. Therefore, the proposed project would not conflict with any of the Building Control Measures.

- Agriculture Control Measures. The Agriculture Control Measures are designed to primarily reduce emissions of methane. Since the project does not include any agricultural activities, the Agriculture Control Measures of the Clean Air Plan are not applicable to the proposed project.

- Natural and Working Lands Control Measures. The Natural and Working Lands Control Measures focus on increasing carbon sequestration on rangelands and wetlands, as well as encouraging local governments to adopt ordinances that promote urban-tree plantings. Since the proposed project does not include the disturbance of any rangelands or wetlands, the Natural and Working Lands Control Measures of the Clean Air Plan are not applicable to the proposed project.

- Waste Management Control Measures. The Waste Management Control Measures focus on reducing or capturing methane emissions from landfills and composting facilities, diverting organic materials away from landfills, and increasing waste diversion rates through efforts to reduce, reuse, and recycle. The proposed project would comply with local requirements for waste management (e.g., recycling and composting services). Therefore, the proposed project would be consistent with the Waste Management Control Measures of the Clean Air Plan.

- Water Control Measures. The Water Control Measures focus on reducing emissions of criteria pollutants, TACs, and GHGs by encouraging water conservation, limiting GHG emissions from publicly owned treatment works (POTWs), and promoting the use of biogas recovery systems. Since these measures apply to POTWs and local government agencies (and not individual projects), the Water Control Measures are not applicable to the proposed project.

- Super GHG Control Measures. The Super-GHG Control Measures are designed to facilitate the adoption of best GHG control practices and policies through the BAAQMD and local government agencies. Since these measures do not apply to individual projects, the Super-GHG Control Measures are not applicable to the proposed project.

As discussed above, the proposed project would generally implement the applicable measures outlined in the Clean Air Plan, including Transportation Control Measures. Therefore, the project would not disrupt or hinder implementation of a control measure from the Clean Air Plan.

Significance Level:
Less Than Significant

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

Comment:
The BAAQMD is currently designated as a nonattainment area for State and national ozone standards and national particulate matter ambient air quality standards. The BAAQMD's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary. The following analysis assesses the potential project-level construction- and operation-related air quality impacts.

Short-Term Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading, paving, building, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, ROG, directly emitted particulate matter ($PM_{2.5}$ and PM_{10}), and TACs such as diesel exhaust particulate matter.

Project construction activities would include site preparation, grading, building, paving, and architectural coating (painting). Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The BAAQMD has established standard measures for reducing fugitive dust emissions (PM_{10}). With the implementation of these Basic Construction Mitigation Measures, fugitive dust emissions from construction activities would not result in adverse air quality impacts.
In addition to dust related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_x, ROG, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

The CalEEMod was used to calculate emissions from on-site construction equipment and emissions from worker and vehicle trips to the site. Construction-related emissions are presented in Table 2, below.

Table 2: Project Construction Emissions (in Pounds Per Day)

Project Construction	ROG	NO_X	Exhaust PM_{10}	Fugitive Dust PM_{10}	Exhaust $PM_{2.5}$	Fugitive Dust $PM_{2.5}$
Average Daily Emissions	6.0	20.8	0.7	0.9	0.7	0.3
BAAQMD Thresholds	**54.0**	**54.0**	**82.0**	**BMP**	**54.0**	**BMP**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA (April 2022).

BAAQMD = Bay Area Air Quality Management District
BMP = Best Management Practices
NO_X = -nitrous oxides
ROG = reactive organic gases
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter

As shown in Table 2, construction emissions associated with the project would not exceed the BAAQMD's thresholds for ROG, NO_x, CO, exhaust PM_{10}, and exhaust $PM_{2.5}$ emissions. In addition to the construction period thresholds of significance, the BAAQMD requires the implementation of Basic Construction Mitigation Measures to reduce construction fugitive dust impacts to a less-than-significant level. Implementation of Regulatory Control Mitigation Measure AIR-1 would ensure that the proposed project incorporates the Basic Construction Mitigation Measures and ensures that short-term construction period air quality impacts would be less than significant.

As shown in Table 2, construction emissions associated with the project would not exceed the significance criteria for ROG, NO_x, PM_{10}, or $PM_{2.5}$ emissions. Therefore, with implementation of Regulatory Control Measure AIR-1, construction of the proposed project would not result in a

cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standards (AAQS).

Long-Term Operational Emissions. Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle and truck trips), energy sources (e.g., electricity and natural gas), area sources (e.g., architectural coatings and the use of landscape maintenance equipment), and stationary sources (e.g., use of the fire pump) related to the proposed project. PM10 emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM10 occurs when vehicle tires pulverize small rocks and pavement, and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other PM emission processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Energy source emissions result from activities in buildings for which electricity and natural gas are used. The quantity of emissions is the product of usage intensity (i.e., the amount of electricity or natural gas) and the emission factor of the fuel source. Major sources of energy demand for the proposed project could include building mechanical systems, such as heating and air conditioning and lighting. Greater building or appliance efficiency reduces the amount of energy for a given activity and thus lowers the resultant emissions. The emission factor is determined by the fuel source, with cleaner energy sources, like renewable energy, producing fewer emissions than conventional sources. Area source emissions associated with the project would include emissions from the use of landscaping equipment. Stationary source emissions are associated with use of the fire pump. Emission estimates for operation of the project were calculated using CalEEMod. The primary emissions associated with the project are regional in nature, meaning that air pollutants are rapidly dispersed on release or, in the case of vehicle emissions associated with the project, emissions are released in other areas of the Air Basin. The daily and annual emissions associated with project operational trip generation, energy, and area sources are identified in Table 3, below, for ROG, NO_x, PM_{10}, and $PM_{2.5}$. CalEEMod output sheets are included in the stand-alone technical memorandum referenced above.

Table 3: Project Operational Emissions

Emissions/Thresholds	ROG	NO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day			
Area Source Emissions	3.2	<0.1	<0.1	<0.1
Energy Source Emissions	<0.1	0.1	<0.1	<0.1
Mobile Source Emissions	0.7	0.8	1.4	0.4
Stationary Source Emissions	<0.1	<0.1	<0.1	<0.1
Total Emissions	**3.8**	**1.0**	**1.4**	**0.4**
BAAQMD Thresholds	**54.0**	**54.0**	**82.0**	**54.0**
Exceed Threshold?	**No**	**No**	**No**	**No**
	Tons Per Year			
Area Source Emissions	0.6	<0.1	<0.1	<0.1
Energy Source Emissions	<0.1	<0.1	<0.1	<0.1
Mobile Source Emissions	0.1	0.1	0.2	0.1
Stationary Source Emissions	<0.1	<0.1	<0.1	<0.1
Total Emissions	**0.7**	**0.2**	**0.2**	**0.1**
BAAQMD Thresholds	**10.0**	**10.0**	**15.0**	**10.0**
Exceed Threshold?	**No**	**No**	**No**	**No**

Source: LSA (April 2022).
Note: Some values may not appear to add up correctly due to rounding.
BAAQMD = Bay Area Air Quality Management District
NOx =-nitrous oxides
ROG = reactive organic gases
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter

The results shown in Table 3 indicate the project would not exceed the significance criteria for daily or

annual ROG, NO_x, PM_{10}, and $PM_{2.5}$ emissions; therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS.

Significance Level:
Less Than Significant with Mitigation

Mitigation:
Mitigation AIR-1: In accordance with the Bay Area Air Quality Management District (BAAQMD) Basic Construction Mitigation Measures, the project applicant shall implement the following BAAQMD construction and air quality control measures during construction:

a. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
b. All haul trucks transporting soil, sand, or other loose material off site shall be covered.
c. All visible mud or dirt tracked-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
d. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
e. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
f. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
g. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
h. All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
i. A publicly-visible sign shall be posted with the telephone number and person to contact at Sonoma County regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

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. The applicant shall submit documentation to Permit Sonoma staff that a Construction Coordinator has been designated and that appropriate signage has been posted including the Coordinator's phone number. Documentation may include photographic evidence or a site inspection, at the discretion of Permit Sonoma staff.

c) Expose sensitive receptors to substantial pollutant concentrations?

Comment:
Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Individuals particularly vulnerable to diesel particulate matter are children, whose lung tissue is still developing, and the elderly, who may have serious health problems that can be aggravated by exposure to diesel particulate matter. Exposure from diesel exhaust associated with construction activity contributes to both cancer and chronic non-cancer health risks. The proposed project is surrounded by existing industrial and commercial uses. The closest receptor to the project site is a childcare center, located approximately 750 feet west of the project site. There are no residential receptors in the vicinity of the project site.

Construction of the proposed project may expose surrounding uses to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, given the large distance to the nearest receptors and because construction contractors would be required to implement Regulatory Control Measure AIR-1 described above, the project's individual construction pollutant emissions would be below the BAAQMD significance thresholds. Once the project is constructed, the project would not be a source of substantial pollutant emissions. Therefore, sensitive receptors are not expected to be exposed to substantial pollutant

concentrations during project construction and operation.

Significance Level:
Less Than Significant with Mitigation

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

Comment:
During construction, the various diesel-powered vehicles and equipment in use on site would create localized odors. These odors would be temporary and are not likely to be noticeable for extended periods of time beyond the project site. Additionally, the proposed uses that would be developed within the project site are not expected to produce any offensive odors that would result in frequent odor complaints. The proposed project would not include sensitive receptors; therefore, odor impacts on the project do not require further evaluation.

Significance Level:
Less Than Significant

4. BIOLOGICAL RESOURCES:

Would the project:

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

Comment:
A Biological Assessment[5], dated February 2022, has been prepared by LSA and is provided as a stand-alone document under separate cover. Additional protocol-level botanical surveys were completed by LSA in Spring 2022, after the completion of the Biological Assessment; the results from those surveys are reported herein.

The project site is located in an area covered under the Santa Rosa Plain Conservation Strategy, which provides a long-term conservation plan to mitigate for the potential adverse effects of future development on federally listed plants and animals in the Santa Rosa Plain (Conservation Strategy Team 2005). The following species are included in the Conservation Strategy: Burke's goldfields (*Lasthenia burkei)*, many-flowered navarretia (*Navarretia leucocephala* ssp*. plieantha*), Sebastopol meadowfoam (*Limnanthes vinculans*), Sonoma sunshine (*Blennosperma bakeri*), and California tiger salamander (*Ambystoma californiense*) – Sonoma County Distinct Population Segment (DPS). The project site is located within an area described as "Potential for Presence of California Tiger Salamander and Listed Plants."

A site assessment was conducted to assess the potential for these and other special-status species to occur at the project site. Relevant databases and reports from past surveys were also reviewed.

Listed Plants. One population of Burke's goldfields was observed in a ditch at the south end of the site during botanical surveys in 1993 (500 individuals) and 1994 (100 individuals). The ditch was subsequently filled, and no goldfields have been observed since that time despite appropriately timed surveys in fourteen years between 1996 and 2022 (surveys conducted in 1996, 1998, 2000, 2001, 2002, 2004, 2005, 2008, 2014, 2015, 2016, 2017, 2018, and 2022). Therefore, no extant population of Burke's goldfields individuals would be affected by the proposed project. However, under the

[5] LSA. 2022. *Biological Assessment LogistiCenter at Santa Rosa*. February.

guidelines of the Conservation Strategy and associated PBO[6][7] and USFWS policy, wetlands that were historically occupied by Burke's goldfields and/or the other listed plant species covered under the Conservation Strategy, are considered to be "occupied" regardless of their current status on the site. Additionally, wetlands hydrologically connected to the historically occupied wetlands may also be considered "occupied" regardless of any evidence of past or current actual occurrences of the listed plant species. Wetlands with no such connection and no evidence of past or current occurrences are considered to be "suitable habitat" for the listed plant species. Consistent with this policy, the USFWS recognized the wetlands south of the project site's drainage divide to be "occupied" habitat, and the wetlands north of the divide to be "suitable" habitat. Consequently, the project site contains the following habitat for Burke's goldfields:

- Occupied Burke's goldfields habitat 0.15 acre
- Suitable Burke's goldfields habitat 0.31 acre

This habitat would be impacted by the proposed project. Implementation of Mitigation Measure BIO-1, described below, would reduce potential impacts to special-status plant species to a less-than-significant level.

California tiger salamander. Field surveys and distributional information suggest that California tiger salamander does not occur within the project site. The site does not contain suitable breeding habitat for this species; the seasonal wetlands present on site do not persist long enough to support larval development. The site does provide marginally suitable upland habitat. However, all of the records of occurrences of California tiger salamander are more than 2.3 miles from the project site, well beyond the 1.3-mile maximum known dispersal distance for this species. There are no known meta populations of California tiger salamanders in the northern portion of the Santa Rosa Plain (i.e., north of Mark West Creek), and the only known occurrence north of Santa Rosa Creek is the population at the Alton Road site, which was apparently introduced. Furthermore, surrounding urban development, including roads, make movement onto the site highly unlikely. However, the project site is within the presumed historic geographic range of California tiger salamander and provides marginally suitable upland and wetland movement and aestivation habitat for this species. Under the Conservation Strategy and the PBO, the project site is located within the region of the Santa Rosa Plain within which all non-hardscaped lands are considered to be suitable habitat for California tiger salamander. Consequently, the proposed project would permanently impact 8.35 acres of suitable wetland and upland movement and aestivation habitat for California tiger salamander. With implementation of Mitigation Measure BIO-2, described below, project impacts on California tiger salamanders would be less than significant

Significance Level:
Less Than Significant with Mitigation

Mitigation:
Mitigation BIO-1: Prior to issuance of a grading permit, the project applicant shall provide documentation verifying the purchase of mitigation credits at an USFWS-approved mitigation or conservation bank on the Santa Rosa Plain. Based on previous consultation with the USFWS and the requirements of the Conservation strategy, wetlands on the southern parcel are considered occupied Burke's goldfields habitat and will be mitigated for at a ratio of 3:1 (purchased to impacted). The remainder of the site's wetlands are considered suitable Burke's goldfields habitat and shall be mitigated for at a ratio of 1.5:1. Consistent with the PBO and USFWS Recovery Plan, all such credits shall be acquired from a bank located within the Windsor Core Area for Burke's goldfields. Evidence

6 Conservation Strategy Team. 2005. Final Santa Rosa Plain Conservation Strategy. Prepared by Conservation Strategy Team. December 1, 2005. Sacramento, California. Updated: December 20, 2017. Website: www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/santa-rosa-strategy.php (accessed February 1, 2022).

7 United States Fish and Wildlife Service. 2020. Letter to Regulatory Division Chief, San Francisco District, U.S. Army Corps of Engineers regarding reinitiation of formal consultation on issuance of Clean Water Act, Section 404 permits by the U.S. Army Corps of Engineers (Corps) on the Santa Rosa Plain, Sonoma County, California, dated June 11, 2020

that the applicant has purchased the required credits from an approved mitigation or conservation bank shall be submitted to the County for review and approval prior to initiation of ground-disturbing activities.

Monitoring: BIO-1. The County shall not issue permit(s) for ground-disturbing activities until after the applicant submits evidence that the applicant has purchased the required credits from an approved mitigation or conservation bank.

Mitigation BIO-2: The project applicant shall ensure protection of California tiger salamander by implementing the following measures during project construction in accordance with the Conservation Strategy and the PBO:

1. USFWS-Approved Project Biologist. A USFWS-approved biologist ("qualified biologist") shall monitor the initial phases of construction work (clearing and grading) and shall have the authority to halt construction work as needed to ensure compliance with the measures contained herein. Only USFWS-permitted biologists shall be allowed to handle California tiger salamanders.

2. Equipment Maintenance. All equipment shall be maintained such that there shall be no leaks of automotive fluids such as gasoline, oils, or solvents. Hazardous materials such as fuels, oils, solvents, etc., shall be stored in sealable containers in a designated location that is at least 200 feet from aquatic habitats. All fueling and maintenance of vehicles and other equipment and staging areas shall be located at least 200 feet from any aquatic habitat.

3. Construction Timing. Grading and clearing work shall be conducted between April 15 and October 15, of any given year, depending on the level of rainfall and site conditions.

4. Revegetation. Project areas temporarily disturbed by construction activities shall be re-vegetated with an erosion control seed mix containing grassland species native to the Santa Rosa Plain.

5. Purchase of Mitigation Credits. Prior to construction, the project applicant shall purchase 1.67 acres of suitable California tiger salamander movement and aestivation habitat from a USFWS-approved mitigation or conservation bank on the Santa Rosa Plain, resulting in an overall mitigation ratio of 0.2:1. Credits may be purchased as combined Burke's goldfields/California tiger salamander credits. Evidence that the applicant has purchased the required credits from an approved mitigation or conservation bank shall be submitted to the County for review and approval prior to initiation of ground-disturbing activities.

   Monitoring: BIO-2. The County shall not issue permit(s) for ground-disturbing activities until after the applicant submits evidence that the applicant has purchased the required credits from an approved mitigation or conservation bank. Permit Sonoma staff shall confirm prior to permit issuance that the applicant has noted these measures on all related grading and construction plans.

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

Comment:
As discussed in Section 3.c. below, seasonal wetlands are present on the project site and would be impacted by the proposed project. No riparian habitat or other sensitive natural communities have been identified on the project site.

Significance Level:
Less Than Significant

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:
The project would result in the filling of 0.46 acre of seasonal wetlands. With implementation of Mitigation Measure BIO-3, described below, impacts on wetlands would be reduced to a less-than-significant level. The wetland mitigation ratio was based on a qualitative functional assessment (Habitat Quality Evaluation) used for the Santa Rosa Plain under the Conservation Strategy and the U.S. Army Corps of Engineers Standard Mitigation Ratio Checklist (Corps 12501.6-SPD). The functional assessment was completed for on-site (impacted) and mitigation wetlands and compared using the Corps procedure. The net result of this analysis was that the mitigation wetlands at the Hale Mitigation Bank are significantly better than the project site's wetlands. The derived mitigation ratio is 1:2.6 (0.39 acres of mitigation needed for each acre of impact.) However, based on the no net loss policies of both the Corps and RWQCB, a minimum ratio of 1:1 is being provided.

Significance Level:
Less Than Significant with Mitigation

Mitigation:
Mitigation BIO-3: Prior to issuance of a grading or building permit or ground disturbance/vegetation removal, the project applicant shall purchase wetland credits at a local mitigation bank at a 1:1 ratio. The mitigation ratio is based on procedures for assessing wetland quality under the Conservation Strategy and for comparing impacted and mitigation wetlands under U.S. Army Corps of Engineers guidelines. The 1:1 mitigation ratio exceeds that required under the procedures.

Monitoring BIO-3. The County shall not issue permit(s) for ground-disturbing activities until after the applicant submits evidence that the applicant has purchased the required credits from an approved mitigation bank.

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:
The project site is surrounded by light industrial development to the north, west, and east and by another partially-developed parcel that is, itself, surrounded by development to the south. Thus, the project site does not serve as a wildlife corridor for any native wildlife species. There is no aquatic fish habitat on site. Trees and grasslands on site do provide nesting habitat for resident native bird species. If construction activities are conducted during the breeding season (February 1 through August 31), such activities could directly impact nesting birds by removing vegetation or structures that support active nests. Prolonged construction noise could also disturb nesting birds, resulting in nest failure. The nests of native birds are protected under Section 3503 of the California Fish and Game Code. With implementation of Mitigation Measure BIO-4, described below, the project would have less than significant impacts on migratory and resident wildlife.

Significance Level:
Less Than Significant with Mitigation

Mitigation Measure:
Mitigation BIO-4:
A qualified biologist shall conduct a preconstruction survey prior to vegetation removal and/or ground-disturbing activities if initiated during the nesting season (February 1-August 31). If a nest is found, a buffer shall be placed around the nest by the qualified biologist. No construction activities shall occur within the buffer until the qualified biologist has determined that the nesting attempt is complete.

Monitoring BIO-4**.** The County shall not issue permit(s) for ground-disturbing activities until after the applicant submits evidence that the site has been surveyed by a qualified biologist to ensure that no active bird nest disturbance or destruction would occur as a result of the project. If the survey determines protective buffers are necessary, the County shall not issue a permit for ground-

disturbing activities until the applicant provides evidence that nest protection buffers are fenced off and active nest monitoring has been initiated.

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

Comment:
The project would include the removal of coast live oak and valley oak trees that may be protected under the Sonoma County Tree Protection Ordinance (County Municipal Code Section 26-88-010(m)). This ordinance requires that applicants for discretionary development permits identify trees proposed for removal and trees proposed for protection. If trees are planned to be protected, tree protection measures are required during construction. If trees that were not planned for removal are damaged, replacements or payment of an in-lieu fee is required. The project site also falls within the Valley Oak Habitat Combining District and may be subject to mitigation under Section 26-67-030 if valley oak trees removed have a cumulative diameter at breast height of greater than 60 inches. All trees will be removed as part of the proposed project. Standard Conditions of Approval will require compliance with the permitting and mitigation requirements of the County's Tree Protection Ordinance and Valley Oak Habitat Combining District and would ensure that tree impacts would be less than significant.

Significance Level:
Less Than Significant

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

Comment:
The project site does not fall within a Habitat Conservation Plan or Natural Community Conservation Plan; therefore, the project is not in conflict with any approved plans

Significance Level:
No Impact

5. CULTURAL RESOURCES:

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Comment:
The California Historical Resources Information System (CHRIS) maintains a wide range of documents and materials relating to historical resources (e.g., buildings, structures, objects, historic and archaeological sites, landscapes, districts). The CHRIS operates structurally through the California Office of Historic Preservation (OHP), nine Information Centers (ICs), and the State Historical Resources Commission (SHRC).

On December 9, 2021, Permit Sonoma referred the project application to the Northwest Information Center (NWIC) for comments and recommendations, and to Native American Tribes within Sonoma County for consultation under AB-52.

The Northwest Information Center has since responded to the County’s project referral specifying that the proposed project area has a low possibility of containing unrecorded archaeological site(s), and that no further study for archaeological resources is recommended.

Representatives from California Native American tribes within the local and regional area have also responded to the County's project referral requesting no further consultation under AB 52, pursuant to Public Resources Code section 21080.3.1.

A Cultural Resources Assessment, dated April 2022, has been prepared by LSA and is provided as a stand-alone document.

A historical resource defined by CEQA includes one or more of the following criteria: 1) the resource is listed, or found eligible for listing in, the California Register of Historical Resources (CRHR); 2) listed in a local register of historical resources as defined by Public Resources Code (PRC) Section 5020.1(k); 3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or 4) determined to be a historical resource by the project's lead agency (PRC Section 21084.1; CEQA Guidelines Section 15064.(a)). Under CEQA, historical resources include built-environment resources and archaeological sites.

Based on the findings of the cultural resources study, no cultural resources have been previously documented or were currently identified within or adjacent to the project area. The project site is currently vacant; therefore, the proposed project would have no impact on historic built-environment resources. No prehistoric resources were recorded within 0.5 mile of the project site, and the site has low geological potential for buried pre-contact resources. However, unknown archaeological resources or artifacts that could qualify as historic resources under CEQA could be discovered during construction.

All grading and building permit plans involving ground disturbing activities shall include the following notes that summarize the County's standard "accidental discovery" condition of approval, which shall be implemented in the event of an inadvertent discovery. With implementation of this standard condition of approval, the potential impact would be reduced to a less than significant level:

> *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 (PRMD) – 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 PRMD. 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 byproducts 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 PRMD 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.*

<u>Significance Level:</u>
Less Than Significant

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

Comment:
As described above, the cultural resources study identified no cultural resources within or adjacent to the project area. No prehistoric resources were recorded within 0.5 mile of the project site, and the site has low geological potential for buried pre-contact resources. However, unknown archaeological resources or artifacts could be discovered during construction.

Implementation of the County's standard "accidental discovery" condition of approval, which shall be implemented in the event of an inadvertent discovery, would reduce the potential impact to less than significant as discussed above in Section 5.a.

Significance Level:
Less Than Significant

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

Comment:
No human remains were identified within or adjacent to the project area. However, human remains could be discovered during construction.

Implementation of the County's standard "accidental discovery" condition of approval, which shall be implemented in the event of an inadvertent discovery, would reduce the potential impact to less than significant as discussed above in Section 5.a.

Significance Level:
Less Than Significant

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:
The proposed project would increase the demand for electricity, natural gas, and gasoline. The discussion and analysis provided below is based on data included in the CalEEMod output.

Construction-Period Energy Use. Construction of the proposed project would require energy for the manufacture and transportation of construction materials, preparation of the site for demolition and grading activities, and construction of the residences. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. Construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Therefore, the proposed project would result in a less-than-significant impact during project construction.

Operational Energy Use. Energy use consumed by the proposed project would be associated with natural gas use, electricity consumption, and fuel used for vehicle and truck trips associated with the project. Energy and natural gas consumption was estimated for the project using default energy intensities by land use type in CalEEMod. Electricity and natural gas usage estimates associated with the proposed project are shown in Table 4.

Table 4: Estimated Annual Energy Use of Proposed Project

Land Use	Electricity Use (kWh per year)	Natural Gas Use (therms per year)	Fuel Consumption (gallons per year)
Warehouse	452,200	4,445	28,167
Parking Lot	13,160	0	0
Total	**465,360**	**4,445**	**28,167**

Source: LSA (April 2022).
kWh = kilowatt-hours

In addition, the proposed project would result in energy usage associated with gasoline to fuel project-related trips. Based on the CalEEMod analysis, the proposed project would result in approximately 645,013 vehicle miles traveled (VMT) per year. The average fuel economy for light-duty vehicles (autos, pickups, vans, and SUVs) in the United States has steadily increased from about 14.9 miles per gallon (mpg) in 1980 to 22.9 mpg in 2020.[8] Therefore, using the average fuel economy estimates for 2020, the proposed project would result in the consumption of approximately 28,167 gallons of fuel (gasoline and diesel) per year. Table 4, above, shows the estimated potential increased electricity and natural gas demand, and fuel consumption associated with the proposed project.

As shown in Table 4, the estimated potential increased electricity demand associated with the proposed project is 465,360 kilowatt-hours (kWh) per year. In 2020, California consumed approximately 279,510 gigawatt-hours (GWh) or 279,510,007,246.[9] Of this total, Sonoma County consumed 2,868 GWh or 2,867,655,443 kWh.[10] Therefore, electricity demand associated with the proposed project would only be approximately 0.02 percent of Sonoma County's total electricity demand.

The estimated potential increased natural gas demand associated with the proposed project is 4,445 therms per year, as shown in Table 4. In 2020, California consumed approximately 12,331 million therms or 12,331,530,178 therms, while Sonoma County consumed approximately 105 million therms or approximately 104,957,039 therms.[11] Therefore, natural gas demand associated with the proposed project would be less than 0.01 percent of Sonoma County's total natural gas demand.

In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. As shown above in Table 4, vehicle trips associated with the proposed project would consume approximately 28,167 gallons of fuel per year. According to the CEC, based on the most recent data available, approximately 13.8 billion gallons of gasoline and 4.2 gallons of diesel is sold annually.[12,13] Therefore, gasoline and diesel fuel demand generated by vehicle trips associated with the proposed project would be a minimal fraction of gasoline and diesel fuel consumption in California.

The proposed project would be constructed to CALGreen standards and Title 24 energy requirements, which would help to reduce energy and natural gas consumption. Therefore, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment use, and transportation. Therefore, construction and operation period impacts related to consumption of energy resources would be less than significant.

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8 U.S. Department of Transportation (DOT). "Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles." Website: https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles (accessed August 2022).

9 California Energy Commission (CEC). 2021. Energy Consumption Data Management Service. Electricity Consumption by County. Website: www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed August 2022).

10 Ibid.

11 CEC. 2021. Energy Consumption Data Management Service. Gas Consumption by County. Website: www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed August 2022).

12 CEC. 2022. California Gasoline Data, Facts, and Statistics. Website: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-gasoline-data-facts-and-statistics (accessed August 2022)

13 CEC. 2022. California Diesel Data, Facts, and Statistics. Website: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics (accessed August 2022)

Significance Level:
Less Than Significant

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

Comment:
In 2002, the Legislature passed Senate Bill 1389, which required the CEC to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels, for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The most recently CEC adopted energy reports are the 2021 Integrated Energy Policy Report[14] and 2022 Integrated Energy Policy Report Update[15]. The Integrated Energy Policy Reports provide the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The Integrated Energy Policy Reports cover a broad range of topics, including implementation of Senate Bill 350, integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency in the electricity sector, energy efficiency, barriers faced by disadvantaged communities, demand response, transmission and landscape-scale planning, the California Energy Demand Preliminary Forecast, the preliminary transportation energy demand forecast, renewable gas (in response to Senate Bill 1383), updates on Southern California electricity reliability, natural gas outlook, and climate adaptation and resiliency.

As indicated above, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact to regional energy supplies would be minor, the proposed project would not conflict with California's energy conservation plans as described in the CEC's Integrated Energy Policy Reports.

Significance Level:
Less Than Significant

7. GEOLOGY AND SOILS:

The information presented in this section is based on data and findings provided in the Geotechnical Investigation[16] and geologic reports and maps by the United States Geological Survey (USGS), California Geological Survey (CGS), and others, as available.

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.

[14] CEC. 2021. *2021 Integrated Energy Policy Report.* California Energy Commission. Docket # 21-IEPR-01.
[15] CEC. 2022. *2022 Integrated Energy Policy Report Update.* California Energy Commission. Docket # 22-IEPR-01.
[16] Cornerstone Earth Group. 2021. *Geotechnical Investigation LogistiCenter at Santa Rosa.* October 18.

Comment:
Surface fault rupture occurs when the ground surface is broken due to fault movement during an earthquake. Fault rupture is generally expected to occur along active fault traces. Areas susceptible to fault rupture are delineated by the CGS Alquist-Priolo Earthquake Fault Zones and require specific geological investigations prior to certain kinds of development to reduce the threat to public health and safety and to minimize the loss of life and property posed by earthquake-induced ground failure. The project site is not located within or adjacent to an Alquist-Priolo Earthquake Fault Zone.[17] The nearest Alquist-Priolo Earthquake Fault Zone is located approximately 2.5 miles to the northeast of the project site (the Hayward Fault). Therefore, the project would have a no impact on people and structures related to fault rupture.

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 Rodgers Creek, Mayacama and other faults. Mapping has been compiled by the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) for the likely shaking intensities in the Bay Area that would have a 10 percent chance of occurring in any 50-year period. A large earthquake (magnitude 6.7 or greater) on one of the major active faults in the region would generate violent (MMI 9) ground shaking at the project site.[18] The risk of ground shaking impacts is reduced through adherence to the design and materials standards set forth in building codes.

Sonoma County requires projects to comply with the California Building Code (CBC) (Title 24, California Code of Regulations), which provides for stringent construction requirements on projects in areas of high seismic risk based on numerous inter-related factors. It is acknowledged that seismic hazards cannot be completely eliminated, even with implementation of advanced building practices. However, the seismic design standards of the CBC are intended to prevent catastrophic building failure in the most severe earthquakes currently anticipated. Project 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.

In addition, as required by the building code, the geotechnical engineer would be required to submit an approval letter for the engineered grading plans prior to issuance of the grading permit. Also, prior to final issuance of the grading permit and the acceptance of the improvements or issuance of a certificate of occupancy, the geotechnical engineer would be required to inspect the construction work and certify to Permit Sonoma that the improvements have been constructed in accordance with the geotechnical specifications. All work would be subject to inspection by Permit Sonoma for conformance with all applicable code requirements and approved improvement plans.

Therefore, compliance with the CBC, which is required by both the County and the State, and other County regulations would ensure that the potential impacts associated with ground shaking would be less than significant. The project would therefore not expose people to substantial risk of injury from seismic shaking.

Significance Level:
Less Than Significant

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17 California Geological Survey. 2019.

18 Metropolitan Transportation Commission and Association of Bay Area Governments. 2018. Probabilistic Earthquake Shaking Hazard Map. Website: mtc.maps.arcgis.com/apps/webappviewer/index.html?id=4a6f3f1259df42eab29b35dfcd086fc8 (accessed July 22, 2022).

iii. Seismic-related ground failure, including liquefaction?

Comment:
Soil liquefaction is primarily associated with saturated soil layers located close to the ground surface. During ground shaking, these soils lose strength and acquire "mobility" sufficient to permit both horizontal and vertical movements. Soils that are most susceptible to liquefaction are clean, loose, uniformly graded, saturated, fine-grained sands that lie relatively close to the ground surface. However, loose sands that contain a significant amount of fines (silt and clay) may also liquefy. The project site is located in an area for which earthquake-induced liquefaction hazards have not yet been evaluated by CGS,[19] however mapping performed by ABAG indicates that the project site is in an area of very low liquefaction susceptibility.[20] Information presented in the Geotechnical Investigation[21] prepared for the project site indicates that there is a potential for liquefaction of localized sand layers during a significant seismic event. Although this potential is low, liquefaction-induced settlement up to approximately 2/3 of an inch could occur. Consistent with the recommendations in the Geotechnical Investigation, the building foundations would be designed to tolerate total and differential settlement due to static loads and liquefaction-induced settlement.

As described above, compliance with the mandatory building code structural specifications would result in new structures that resist adverse effects related to liquefaction. Compliance with existing County regulations, the requirements of the CBC, and implementation of recommendations identified in the Geotechnical Investigation, the risks to people and structures due to liquefaction would represent a less-than-significant impact.

Significance Level:
Less Than Significant

iv. Landslides?

Comment:
The project site and surrounding area are relatively flat, therefore the project would result in no impacts related to landslides.

Significance Level:
No Impact

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

Comment:
Development of the project site would involve construction activities such as grading and excavation, which could result in temporary soil erosion when the disturbed soils are exposed to wind or rainfall. Because the proposed project would involve over an acre of land disturbance, it would be required to comply with the State Water Resources Control Board's Construction General Permit, which requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include erosion control best management practices that would minimize erosion during construction. Upon completion of construction, the project site would be covered with structures, pavement, and landscaping and would not include areas of exposed soil. Therefore, the proposed project would result in less-than-significant impacts related to soil erosion or loss of top soil.

Significance Level:

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19 California Geological Survey. 2019. op. cit.

20 Metropolitan Transportation Commission and Association of Bay Area Governments. 2018. Earthquake Liquefaction Susceptibility Map. Website: mtc.maps.arcgis.com/apps/webappviewer/index.html?id=4a6f3f1259df42eab29b35dfcd086fc8 (accessed July 22, 2022).

21 Cornerstone Earth Group. 2021. *Geotechnical Investigation LogistiCenter at Santa Rosa.* October 18.

Less Than Significant

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

Comment:
As previously discussed in Response 6.1(a) above, landslides are not a concern for the project because of the flat topography of the area and potential impacts from liquefaction would be less-than-significant through adherence to plans and specifications approved by the County that meet the design and materials standards set forth in the CBC.

Lateral spreading occurs when surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. Upon reaching mobilization, the surficial soils are transported downslope or in the direction of a free face by earthquake and gravitational forces. The risk of lateral spreading at the project site is less than significant because the project site is relatively flat and there are no slopes or free faces on or adjacent to the project site.

Subsidence or collapse can result from the removal of subsurface water resulting in either catastrophic or gradual depression of the surface elevation of the project site. The only removal of subsurface water that may occur as part of the project is temporary dewatering of excavations during construction. The temporary dewatering of shallow excavations would not cause significant ground subsidence or collapse as the dewatering would be limited and localized to the area of the excavation. Therefore, the potential for subsidence related impacts is 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 risks to life or property?

Comment:
Expansive soils are characterized by the potential for shrinking and swelling as the moisture content of the soil decreases and increases, respectively. Shrink-swell potential is influenced by the amount and type of clay minerals present and can be measured by the percent change of the soil volume. According to the Geotechnical Investigation prepared for the proposed project, moderately to highly expansive surficial native soils generally blanket the site. To reduce the potential for damage to the proposed building, the Geotechnical Investigation recommends that slabs-on-grade should have sufficient reinforcement and be supported bon a layer of non-expansive fill; and footings should extend below the zone of seasonal moisture fluctuation. In addition, a plug of low-permeability clay soil, sand-cement slurry or lean concrete is recommended to be placed within trenches just outside where the trenches pass into building and pavement areas. Implementation of detailed grading and foundation recommendations included in the Geotechnical Investigation would ensure that potential impacts related to expansive soils at the project site would be reduced to a less-than-significant level.

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 proposed project would connect to the existing wastewater conveyance system. On-site treatment and disposal of wastewater is not proposed for the project; therefore, the proposed project would have no impacts associated with soils incapable of supporting alternative wastewater disposal systems.

Significance Level:
No Impact

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

Comment:
Proposed improvements would require no or minimal excavation or earth working activities. However, there is a possibility that such activities could uncover sub-surface paleontological resources. Implementation of the County's standard "accidental discovery" condition of approval, which shall be implemented in the event of an inadvertent discovery would reduce the potential impact to less than significant as discussed above in Section 5.a.

Significance Level:
Less Than Significant

8. GREENHOUSE GAS EMISSIONS:

This section has been prepared based on the analysis contained in the Air Quality and Greenhouse Gas Emissions Analysis memorandum.[22] This memorandum was prepared using methods and assumptions recommended by the Bay Area Air Quality Management District (BAAQMD) and is provided as a stand-alone document under a separate cover.

Would the project:

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

Comment:
GHG emissions associated with the project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust. There would also be long-term GHG emissions associated with project-related vehicle trips. Recognizing that the field of global climate change analysis is rapidly evolving, the approaches advocated most recently indicate that for determining a project's contribution to GHG emissions, lead agencies should calculate, or estimate, emissions from vehicular traffic, energy consumption, water conveyance and treatment, waste generation, construction activities, and any other significant source of emissions within the project area.

Construction GHG Emissions. Construction activities, such as site preparation, site grading, on-site heavy-duty construction vehicles, equipment hauling materials to and from the project site, and motor vehicles transporting the construction crew would produce combustion emissions from various sources. During construction of the proposed project, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO2, CH4, and N2O. Furthermore, CH4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction. Using CalEEMod, it is estimated that construction of the proposed project would generate a total of approximately 400.4 metric tons (MT) CO2e. Implementation of Mitigation Measure AIR-1 (see Section 3.b., Air Quality) would reduce GHG emissions by reducing the amount of construction vehicle idling and by requiring the use of properly maintained equipment.

Operational GHG Emissions. Long-term GHG emissions are typically generated from mobile sources (e.g., vehicle trips), area sources (e.g., maintenance activities and landscaping), indirect emissions

[22] LSA. 2022. *Air Quality and Greenhouse Gas Emissions Analysis*. April 21.

from sources associated with energy consumption, waste sources (land filling and waste disposal), water sources (water supply and conveyance, treatment, and distribution), and stationary sources (use of the fire pump). Mobile-source GHG emissions would include project-generated vehicle trips to and from the project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the project. Waste source emissions generated by the proposed project include energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment. Stationary source emissions would be associated with use of the fire pump.

In April 2022, the BAAQMD adopted the *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans*[23] document which incorporates updated GHG significance thresholds. The BAAQMD recommends these thresholds of significance for use in determining whether a proposed project will have a significant impact related to climate change. These thresholds evaluate a project based on its effect on California's efforts to meet the State's long-term climate goals. Applying this approach, the BAAQMD identifies and provides supporting documentation, outlining the requirements for new land use development projects necessary to achieve California's long-term climate goal of carbon neutrality by 2045. Based on their analysis, the BAAQMD found that new land use development projects need to incorporate design elements to do its "fair share" to implement the goal of carbon neutrality by 2045. If a project is designed and built to incorporate the identified design elements, then it will contribute its portion of what is necessary to achieve California's long-term climate goals—its "fair share"—and an agency reviewing the project under CEQA can conclude that the project will not make a cumulatively considerable contribution to global climate change. The document concludes that if a project does not incorporate these design elements, then it should be found to make a significant climate impact because it will hinder California's efforts to address climate change.

According to BAAQMD *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, a project would have a less than significant impact related to GHG emissions if it would:

A. Include, at a minimum, the following project design elements:

    1. Buildings
        a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
        b. The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
    2. Transportation
        a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
            i. Residential projects: 15 percent below the existing VMT per capita
            ii. Office projects: 15 percent below the existing VMT per employee
            iii. Retail projects: no net increase in existing VMT
        b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

B. Or be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

[23] Bay Area Air Quality Management District. 2022.*Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*. April.

As discussed above, according to the BAAQMD CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans, if a project is consistent with an adopted qualified GHG Reduction Strategy that meets the standards, it can be presumed that the project will not have significant GHG emission impacts. The County's CAP (Regional Climate Action Plan) meets the CEQA Guidelines' requirements for a Qualified GHG Reduction Strategy. Therefore, the proposed project's greenhouse gas emissions would not be considered significant if it would be consistent with the County's CAP.

The County's CAP includes a Consistency Checklist to help the County provide a streamlined review process for new development projects that are subject to discretionary review pursuant to CEQA. The project's Consistency Checklist, provided in the Air Quality and Greenhouse Gas Emissions Analysis memorandum (provided under separate cover) indicates that the proposed project would be consistent with the County's CAP. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.

Significance Level:
Less Than Significant

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

Comment:
The project was also analyzed for consistency with the CARB Scoping Plan measures. The following discussion evaluates the proposed project according to the goals of AB 32, the AB 32 Scoping Plan, EO B-30-15, SB 32, and AB 197.

AB 32 is aimed at reducing GHG emissions to 1990 levels by 2020. AB 32 requires the CARB to prepare a Scoping Plan that outlines the main State strategies for meeting the 2020 deadline and to reduce GHGs that contribute to global climate change. The AB 32 Scoping Plan has a range of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program.

EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps us on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016. As identified above, the AB 32 Scoping Plan contains GHG reduction measures that work towards reducing GHG emissions, consistent with the targets set by AB 32 and EO B-30-15 and codified by SB 32 and AB 197. The measures applicable to the proposed project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below.

- Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As identified above, the proposed project would comply with the latest Title 24 standards of the California Code of Regulations, regarding energy conservation and green building standards. In addition, the proposed project would include a solar-ready roof and would

be LEED certified. Therefore, the proposed project would comply with applicable energy measures.

- Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the project would be required to comply with the latest Title 24 standards of the California Code of Regulations, which includes a variety of different measures, including reduction of wastewater and water use. In addition, the proposed project would be required to comply with the California Model Water Efficient Landscape Ordinance basins. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

- The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025, resulting in a 3 percent decrease in average vehicle emissions for all vehicles by 2020. Vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. In addition, the proposed project is not expected to generate a substantial number of daily trips. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

The proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in AB 32, the AB 32 Scoping Plan, EO B-30-15, SB 32, and AB 197 and would be consistent with applicable State plans and programs designed to reduce GHG emissions. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Significance Level:
Less Than Significant

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:
The proposed project would result in the construction of industrial park uses, which could include research, light manufacturing, assembly and headquarters office uses or other uses permitted under the County's MP zoning designation that may involve the use, handling, and storage of commercially-available hazardous materials associated with building maintenance, on-site vehicle use, and landscaping. These materials would likely include fuels, paints, flammable liquids, pesticides, and herbicides. However, hazardous materials stored and used at the site would be required to be managed in accordance with applicable local, State, and federal hazardous materials regulations that would reduce risks associated with leakage, explosions, fires, or the escape of harmful gases. In addition, the project applicant is required by ordinance to comply with applicable hazardous waste generator, storage tank, and AB2185 (hazardous materials handling) requirements and maintain all applicable permits for these programs from the Hazardous Materials Division of Sonoma County Department of Emergency Services. Compliance with existing hazardous materials regulations and programs would ensure that the proposed project would not create a significant hazard to the public or the environment associated with the routine transport, use, or disposal of hazardous materials by ensuring that these materials are properly handled during construction and operation of the proposed project.

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:
The project site was originally part of the old Santa Rosa Army Airfield, which operated from 1942 until it was decommissioned in 1947. The RWQCB and Department of Toxic Substances Control (DTSC) conducted multiple investigations of the old military base, in conjunction with the United States military. Most of the areas of concern were located to the west, near the runways. There was an old ordnance depot to the northwest where scattered old chemical warfare ordnance (mustard gas) was found during the installation of a sewer line in the late 1980s, which prompted investigations in the 1990s/early 2000s. A site-wide closure letter was issued by the RWQCB in April 2006, indicating that no further action was required.

As described in Section 9.a above, operation of the proposed project may require the use of hazardous materials associated with proposed light industrial uses at the project site. However, hazardous materials stored and used at the site would be required to be managed in accordance with applicable local, State, and federal hazardous materials regulations that would reduce risks associated with leakage, explosions, fires, or the escape of harmful gases.

Hazardous materials most likely to be used during construction include typical construction materials such as gasoline, diesel, motor oil, lubricants, solvents, and adhesives. Such materials would be kept at construction staging areas, and would be secured when not in use. In the unlikely event of a spill, fuels would be controlled and disposed of in accordance with applicable regulations. Drips and small spills would be the most likely potential hazardous materials releases to occur; however, any release that occurs in close proximity to a stream or drainage channel could have a significant impact on the environment, if not properly controlled. The project contractor would be required to prepare and implement a SWPPP for the proposed project in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (NPDES General Construction Permit)(Order No. 2009-0009-DWQ, NPDES No. CAS000002) permitting requirements, which would reduce the potential for hazardous materials releases to occur during construction, and would reduce the potential for spills to impact sensitive habitat or human health, to a less-than-significant level. SWPPPs are required for construction sites over one acre that do not qualify for a waiver. Therefore, development of the proposed project would not create a significant hazard to the public or environment. This impact 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:
There are no schools within 0.25-mile of the project site. The nearest school is Sonoma County Day School, located approximately 0.6-mile to the northeast of the project site. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Significance Level:
No Impact

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:
Government Code Section 65962.5 states that the California Department of Toxic Substances shall compile and maintain annually a list of hazardous waste facilities subject to corrective action as part of the Health and Safety Code. This list is commonly referred to as the Cortese List. The project site is not located on the Regional Water Quality Control Board's Leaking Underground Tank Cleanup Site (LUST) or any other Cleanup Program Sites (formerly known as spills, leaks, investigations, and cleanups or SLIC). These two components comprise the State Cortese List of known hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impact related to listing on a hazardous materials site compiled pursuant to Government Code Section 65962.5 would occur.

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:
The project site is located approximately 0.7 mile west of the Charles M. Schulz–Sonoma County Airport and is located within the Sonoma County Airport Industrial Area Specific Plan. The project site is located with the area of influence of the Sonoma County Airport as indicated in the Sonoma County Comprehensive Airport Land Use Plan[24] and is located with Safety Zone Traffic Pattern Zone (TPZ)-B. The proposed industrial use would be consistent with the land uses allowed in TPZ-B. Therefore, the proposed project would not result in a safety hazard due to the proximity of an airport.

Significance Level:
Less Than Significant

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

Comment:
Brickway Boulevard and Copperhill Parkways would serve as emergency access and evacuation routes for the project site. The proposed project would involve limited roadwork on Brickway Boulevard and Copperhill Parkway, including sidewalk and driveway improvements. The proposed project would not reduce the number of traffic lanes on adjacent roadways and would not alter the existing street grid, and therefore it would not alter or obstruct emergency evacuation routes. Therefore, the proposed project would not be expected to impair the function of nearby emergency evacuation routes and would have less than significant impacts on implementation of an adopted emergency response plan or emergency evacuation plan.

Significance Level:
Less Than Significant

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

Comment:
The California Department of Forestry and Fire Protection (CAL FIRE) has mapped very high fire hazard severity zones in Alameda County to help responsible local agencies, such as the Hayward

[2424] Sonoma, County of. Comprehensive Airport Land Use Plan. Website: https://permitsonoma.org/longrangeplans/adoptedlong-rangeplans/airportlanduseplan (accessed July 24, 2022)

Fire Department, identify measures to reduce the potential for loss of life, property, and resources from wildland fire. The project site and surrounding area are mapped by CAL FIRE to not be within a very high fire hazard severity zone.[25]

The project site is located within an urban industrial area and is surrounded on three sides by urban development. Vegetation on the project site is minimal, consisting primarily of sparse grass and a few small trees, and therefore would not be considered very susceptible to fire. Therefore, the project would result in a less-than-significant impact related to wildland fires.

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:
The project site is located within the Mark West Creek Watershed, which drains approximately 40 square miles, east of the cities of Santa Rosa and Windsor. Mark West Creek joins the Laguna de Santa Rosa about five miles upstream of the Laguna's confluence with the Russian River. The major tributaries of Mark West Creek include: Humbug, Mill, Porter, Van Buren, and Weeks Creeks.[26]

A low rise near the boundary of parcels -051 and -052 establishes a hydrological divide between the wetlands at the north end of the project site and those at the south end. To the north of the drainage divide, drainage flows northerly toward a seasonal wetland located near the northern boundary of the project site and ultimately into a municipal storm drain inlet in the property's northwest corner. South of the drainage divide, surface drainage flows southwesterly into seasonal wetlands along Copperhill Parkway and into a municipal storm drain inlet along the curb. Two storm drain inlets also occur along Brickway Boulevard on the eastern edge of the site

Water quality in the State of California is regulated by the State Water Resources Control Board (State Water Board) and the nine Regional Water Quality Control Boards. The project site is located within the jurisdiction of the North Coast Regional Water Quality Control Board (RWQCB). Section 303(d) of the Federal Clean Water Act (CWA) requires that states identify water bodies including bays, rivers, streams, creeks, and coastal areas that do not meet water quality standards and the pollutants that are causing the impairment. Total Maximum Daily Loads (TMDLs) describe the maximum amount of a pollutant that a water body can receive while still meeting established water quality standards. A TMDL requires that all sources of pollution and all aspects of a watershed's drainage system be reviewed and set forth action plans that examine factors and sources adversely affecting water quality and identify specific plans to improve overall water quality and reduce pollutant discharges into impaired water bodies. The Russian River is on the 303(d) list under Category 5 criteria (i.e., a water segment where standards are not met and a TMDL is required, but not yet completed, for at least one of the pollutants being listed for this segment) for pollutants including dissolved oxygen, sedimentation/siltation, water temperature, aluminum, and pathogens.[27]

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[25] California Department of Forestry and Fire Protection. 2022. Fire Hazard Severity Zone Viewer. Website: https://egis.fire.ca.gov/FHSZ/ (accessed July 24, 2022)

[26] Sonoma Resource Conservation District. Mark West District Watershed. Website: https://sonomarcd.org/district-watersheds/mark-west/ (accessed July 26, 2022).

[27] State Water Resources Control Board. 2022. Final Revised Appendix A: Recommended 2020-2022 303(d) List of Impaired Waters. Available online at: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html (accessed July 26, 2022)

The National Pollutant Discharge Elimination System (NPDES) was created under the CWA and is regulated by the State Water Board in California to prohibit the discharge of pollutants to receiving waters unless the discharge is in compliance with NPDES permit requirements. The NPDES requirements that apply to both the construction-phase and the operation-phase of the project are described below.

Construction Phase. The proposed project would disturb greater than 1 acre of land, and therefore would be required to obtain coverage under the Construction General Permit (State Water Board Order 2009-0009-DWQ (General Permit).[28] On-site construction activities subject to the General Permit include clearing, grading, excavation, and soil stockpiling. The General Permit also require the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer. A SWPPP identifies all potential pollutants and their sources, including erosion, sediments, and constructions materials and must include a list of Best Management Practices (BMPs) to reduce the discharge of construction-related stormwater pollutants. A SWPPP must include a detailed description of controls to reduce pollutants and outline maintenance and inspection procedures. Typical sediment and erosion BMPs include protecting storm drain inlets, establishing and maintaining construction exits and perimeter controls to avoid tracking sediment off-site onto adjacent roadways. A SWPPP also defines proper building material staging and storage areas, paint and concrete washout areas, describes proper equipment/vehicle fueling and maintenance practices, measures to control equipment/vehicle washing and allowable non stormwater discharges, and includes a spill prevention and response plan. Required compliance with State and local regulations regarding stormwater during construction would ensure that the proposed project would result in less-than-significant impacts to water quality during construction.

Operation Phase. The proposed project would be required to comply with Sonoma County regulations related to stormwater runoff, including implementation of post-construction stormwater management and the requirements of the NPDES Phase 1 Term 4 Municipal Separate Storm Sewer System (MS4) permit (Phase 1 MS4 Permit; Order No. R1-2015-0030; NPDES No. CA0025054), which covers the City of Santa Rosa and unincorporated areas near the cities of Healdsburg, Windsor, Santa Rosa, Rohnert Park, Cotati and Sebastopol.[29]

The Phase I MS4 Permit requires all new development projects creating or replacing a combined total of 1.0 acre or more of impervious surface to implement post-construction treatment controls to mitigate all project-related storm water pollution. The Phase I MS4 Permit also requires implementation of Low Impact Development (LID) standards. LID uses design techniques such as harvest and reuse, infiltration, evapotranspiration to mimic a site's pre-development hydrology.

The Phase 1 MS4 Permit requires regulated projects to include facilities designed to evapotranspire, infiltrate, harvest/use, and biotreat stormwater to meet at least one of the hydraulic sizing design criteria included in the permit. To comply with the Phase 1 MS4 Permit, a Storm Water Mitigation Plan (SWMP) that provides pre- and post-development runoff calculations and project specific Best Management Practices (BMPs) must be prepared and implemented.

The proposed project would include installation of bio-retention facilities along the site's western and northern boundaries to capture site runoff in accordance with the Priority 1 objective of the Santa Rosa LID Technical Design Manual. These BMP measures are in place to offset the net increase in impervious surface. Stormwater for larger events will pond in the bioretention swale before entering an existing overflow inlet at the northwest corner of the property, where it will be conveyed in the existing stormdrain system.

Since LID measures would be required under existing NPDES regulations and these measures encourage reuse, infiltration, and bioretention so that site hydrology is not substantially altered, long-

[28] State Water Resources Control Board Division of Water Quality, 2009. *Construction General Permit Fact Sheet. 2009-0009-DWQ amended by 2010-0014-DWQ & 2012-0006-DWQ.*

[29] North Coast Regional Water Quality Control Board. 2015. *Order No. R1-2015-0030 NPDES NO. CA0025054, National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems.*

term operation of the proposed project would have a less than significant impact on water quality.

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 project site is located in the Santa Rosa Valley Groundwater Basin, Santa Rosa Plain Subbasin Number 1-55.01 (Subbasin), which encompasses approximately 125 square miles. The Subbbasin is It is generally bounded on the west by low-lying hills of the Mendocino Range and on the east by the Sonoma Mountains and Mayacamas Mountains.[30] The Subbasin is drained principally by Santa Rosa and Mark West Creek that flow westward and collect into the Laguna de Santa Rosa. The Laguna de Santa Rosa flows northward and discharges into the Russian River.

Borings conducted as part of the Geotechnical Investigation encountered groundwater at depths ranging from about 19 to 28 feet below grade. The recommended design groundwater depth for the proposed project is 18 feet to account for fluctuations in groundwater levels due to seasonal fluctuation, underground drainage patterns, regional fluctuations, and other factors.

Due to the depth of groundwater on the project site, dewatering is not anticipated during construction activities involving excavation. Any construction-related dewatering, if required, would be temporary and limited to the area of excavations on the project site and would not substantially contribute to depletion of groundwater supplies.

Operation of the proposed project would not involve dewatering or the use of groundwater as potable water, because potable water would be supplied to the project site by the Town of Windsor through the existing service agreement with Sonoma County. Development of the proposed project would result in an increase in impervious surfaces on the project site of approximately 293,685 square feet (6.74 acres) compared to the existing condition. Although the proposed project would increase the amount of impervious surfaces, the construction of stormwater management bio-retention areas along the site's western and northern boundaries would allow much of the stormwater runoff from the project site to infiltrate into the ground surface. Therefore, the proposed project would have a less-than-significant impact on groundwater resources.

Significance Level:
Less Than Significant

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

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

Comment:
While the project would result in some minor changes to drainage patterns, no river or stream course would be altered. As discussed under Water Quality Standards in subsection a) above, the proposed project would be required to comply with State regulations for stormwater quality, including the Construction General Permit during construction of the project and the Phase 1 MS4 Permit during operation of the project. Compliance with these State regulations which are designed to prevent erosion and siltation would ensure that the proposed project would have a less than-significant-impact related to erosion and siltation.

[30] Santa Rosa Plain Groundwater Sustainability Agency. 2022. *Groundwater Sustainability Plan for Santa Rosa Plain Groundwater Subbasin*.

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:
Construction activities associated with implementation of the proposed project would temporarily alter on-site drainage patterns and compact soil, which can increase the volume and velocity of storm water runoff. However, construction activities would be temporary, and the increase in runoff would not be substantial. As discussed in Section 10.a above, the Construction General Permit requires the preparation of a SWPPP to identify construction BMPs to be implemented as part of the project to reduce impacts to water quality during construction, including those impacts associated with flooding. Therefore, adherence to the Construction General Permit would ensure that construction activities would result in a less than significant impact.

The project would alter drainage patterns by creating new landscaped areas and impermeable pavement surfaces. As discussed above, the proposed project would be required to comply with the hydromodification requirements of the Phase 1 MS4 Permit, including installation of bio-retention areas to capture and filter stormwater runoff. A preliminary low impact development stormwater plan has been provided and a final plan is required prior to grading permit issuance. In addition, the project's storm water design is required to comply with the Sonoma County Water Agency's flood control design requirements. Required compliance with applicable regulations, as described above, would reduce potential impacts of the project related to changes in drainage patterns 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:
Existing surface drainage at the project site currently flows to the north into a municipal storm drain inlet in the property's northwest corner and to the southwest into a municipal storm drain inlet along Copperhill Parkway. Two storm drain inlets also occur along Brickway Boulevard on the eastern edge of the site. The proposed project would improve the drainage pattern of the site so that surface flows are conveyed into bio-retention basins along the site's western and northern property boundaries, in compliance with State and County stormwater regulations. Compliance with construction- and operation phase storm water requirements would further ensure that development of the project would not create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems.

Significance Level:
Less Than Significant

iv. impede or redirect flood flows?

Comment:
The project site is designated as an area subject to inundation by the 0.2 percent Annual Chance Flood Hazard or areas with 1 percent annual chance of flood with average depth less than one foot or with drainage areas of less than one square mile (Zone X).[31] Zone X is not considered a special flood hazard area. Therefore, the proposed project would not impede or redirect flood flows.

[31] Federal Emergency Management Agency, 2008. *Flood Insurance Rate Map, Sonoma County Unincorporated Areas, Map Number 06097C0568E.* December 2.

Significance Level:
No Impact

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

Comment:
As discussed further under Response 10.d.(iv), the project site is located in Flood Zone X, which is not considered a special flood hazard area. In addition, the project is located approximately 18 miles from the ocean shoreline and 30 miles from San Pablo Bay and is not located in a tsunami inundation area.[32] Finally, the project site is not in close proximity to any large bodies of water and is not at risk of inundation due to seiche. Therefore, the project would not result in a release of pollutants due to inundation as a result of on-site flooding, tsunami, or seiche and there would be no impact.

Significance Level:
No Impact

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

Comment:
As discussed in Response 10.a., the proposed project would be required to comply with State and local regulations to prevent stormwater pollution and minimize potential sedimentation during construction. With adherence to these regulatory requirements, the project would not result in water quality impacts that would conflict with the RWQCB's Basin Plan. Therefore, impacts related to conflict with a water quality control plan would be less than significant.

As discussed in Response 10.b., construction and operation of the proposed project would not require groundwater extraction. Additionally, the proposed project would not increase the impervious surfaces on the project site and therefore would not decrease the amount of water that is able to recharge the aquifer. For these reasons, the project would not conflict with the Groundwater Sustainability Plan for Santa Rosa Plain Groundwater Subbasin.[33]

Significance Level:
Less Than Significant

11. LAND USE AND PLANNING:

Would the project:

a) Physically divide an established community?

Comment:
Physically dividing an established community generally refers to installation of infrastructure such as an interstate highway or railroad tracks, or removal of access such as a bridge or local road that would impair mobility within an existing community or between a community and outlying areas.

The project site is located along Brickway Boulevard and Copperhill Parkway, and occupies three parcels bordered by industrial and commercial uses to the north, east, and west. The project site is currently vacant. Redevelopment of the project site would represent a general continuation of the industrial uses found adjacent to the project site and would be consistent with the type and intensity of development in the area. Vehicle access to the site would be provided via two separate driveways located on Brickway Boulevard and Copperhill Parkway. The proposed project would not result in a physical division of an established community or adversely affect the continuity of land uses in the

[32] California, State of. 2009. California Emergency Management Agency. Tsunami Hazard Area Map Application. Website: https://www.conservation.ca.gov/cgs/tsunami/maps/sonoma (accessed July 26, 2022)
[33] Santa Rosa Plain Groundwater Sustainability Agency. 2022. op. cit..

vicinity. As a result, this impact would result in no impact.

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 Sonoma County General Plan 2020 designates the project site for Limited Industrial (LI) land uses. The Limited Industrial designation provides sites for development to meet service and employment needs where the range or scale of industrial uses is limited. Permitted uses include modern compatible industrial research, light manufacturing, assembly and headquarters office uses. As specified in the General Plan, structures are generally not expected to cover more than 50 percent of the site or exceed 65 feet in height. The County's Zoning Map identifies the project site as Industrial Park (MP2 AC AVG) with Valley Oak Habitat Combining District (VOH).

The project does not propose to change the General Plan land use designation or the current zoning for the project site and would be consistent with the County's General Plan and Zoning Ordinance. Additionally, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and therefore would result in no impacts.

Significance Level:
Less Than Significant

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:
The State Mining Reclamation Act of 1975 (SMARA) identifies and protects California's mineral resources. Sonoma County has adopted the Aggregate Resources Management Plan[34] that identifies aggregate resources of Statewide or regional significance (areas classified as MRZ-2 by the State Geologist). No known mineral resources are located at the project site. The project site is currently undeveloped but surrounded on three sides by existing industrial and commercial development. No known mineral resources are located at the site. The project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the State.

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.

[34] Sonoma, County of. Aggregate Resource Management Plan. Website: https://permitsonoma.org/longrangeplans/adoptedlong-rangeplans/aggregateresourcemanagement (Accessed July 24, 2022).

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:
Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep. Several noise measurement scales exist that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative intensity of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a 10-fold increase in acoustic energy, while 20 dB is 100 times more intense and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness; and similarly, each 10 dB decrease in sound level is perceived as half as loud. Sound intensity is normally measured through the A-weighted sound level (dBA), and this scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for 24-hour sound measurements which better represent how humans are more sensitive to sound at night.

As noise spreads from a source, it loses energy so that the farther away the noise receiver is from the noise source, the lower the perceived noise level would be. Geometric spreading causes the sound level to attenuate or be reduced, resulting in a 6 dB reduction in the noise level for each doubling of distance from a single point source of noise to the noise sensitive receptor of concern. There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. Equivalent continuous sound level (Leq) is the total sound energy of time varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the Leq, the community noise equivalent level (CNEL), and the day-night average level (Ldn) based on A-weighted decibels (dBA). CNEL is the time varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly Leq for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). Ldn is similar to the CNEL scale, but without the adjustment for events occurring during the evening relaxation hours. CNEL and Ldn are within one dBA of each other and are normally exchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

A project would result in a significant noise effect if it would substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of applicable regulatory agencies, including, as appropriate, Sonoma County.

Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The project site is surrounded by industrial uses to the north, west and east. To the south lies another undeveloped lot that is itself bounded by existing industrial/commercial development on the west, south, and east. The closest sensitive receptors include the mobile home park and multi-family residential development located over 4,000 feet east of the project site.

As shown in Table 5, Sonoma County sets noise and land use compatibility standards in the General Plan. The General Plan identifies exterior noise thresholds of up to 75 dBA Ldn as normally acceptable for industrial land uses.

Table 5: Maximum Allowable Exterior Noise Exposures for Non-transportation Noise Sources

Hourly Noise Metric[1], dBA	Daytime (7:00 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7:00 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 L50 is the value exceeded 50% of the time or 30 minutes in any hour; this is the median noise level.

Source: Sonoma, County of. Sonoma County General Plan 2020. Noise Element

Construction-Period Impacts. Construction of the proposed project could include construction activities that would result in temporary increase in ambient noise levels in the project site vicinity. In particular, the project construction could result in short-term noise impacts to surrounding properties and uses. Maximum construction noise levels would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of noise impacts generally would be from one day to several days depending on the phase of construction. Project construction would occur for approximately 11 months.

The County's General Plan and Zoning code do not establish construction-related noise standards. Therefore, construction activities would not generate noise levels in excess of applicable standards. However, the project would result in a temporary increase in ambient noise levels in the project vicinity during construction. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time. The project is not anticipated to require nighttime construction activity. However, the project would temporarily increase noise levels during construction in the project area, over an approximately 11-month period. Implementation of Mitigation Measure NOISE-1 would reduce the noise impact from construction activities and hauling to a less than significant level.

Long-Term Noise Impacts. The project would generate long-term noise impacts from both traffic and stationary noise sources, as discussed below.

Traffic Noise Impacts. Motor vehicles with their distinctive noise characteristics are the dominant noise source in the project vicinity. The amount of noise varies according to many factors, such as volume of traffic, vehicle mix (percentage of cars and trucks), average traffic speed, and distance from the observer.

Implementation of the proposed project would result in new daily trips on local roadways in the project site vicinity. A characteristic of sound is that a doubling of a noise source is required in order to result in a perceptible (3 dBA or greater) increase in the resulting noise level. Based on the draft Traffic Impact Study[35] prepared for the proposed project, the project would result in approximately 221 trips per day, including 22 a.m. peak hour trips and 23 trips during the p.m. peak hour. Project trips would represent a small fraction of the overall roadway traffic volumes. Therefore, project daily trips would not result in a doubling of traffic volumes along any roadway segment in the project vicinity and would not result in a perceptible increase in traffic noise levels at receptors in the project vicinity. The resulting noise levels would remain in the normally acceptable range for industrial land uses. In addition, no existing noise-sensitive land uses exist along these roadway segments. Therefore, the project would not expose persons to noise levels in excess of noise standards and noise impacts would be less than significant.

Stationary Noise Sources. Stationary noise sources associated with the project could include heating, ventilation, and air conditioning (HVAC) mechanical equipment, truck loading/unloading

[35] W-Trans. 2022. *Draft Transportation Impact Study for the LogistiCenter at Santa Rosa*. March 17.

activities, and typical motor vehicle/parking area activities. Noise generating equipment would be setback a minimum of 85 feet from adjacent property lines. Of the on-site stationary noise sources during operation of the project, noise generated by truck activity would generate the highest maximum noise levels. Typical parking activities, such as people conversing or doors slamming, would generate noise levels of approximately 60 dBA to 70 dBA Lmax at 50 feet, while truck loading and unloading activities would result in maximum noise levels generating a noise level of 75 dBA Lmax at 50 feet.

Loading activities at the project site could include the loading of manufactured goods produced on the site. These activities are potential noise sources that could affect noise-sensitive receptors in the project site vicinity. However, as described above, the nearest noise-sensitive receptors are located over 4,000 feet from the project site. Further, peak noise levels from loading and unloading would be intermittent and when averaged over 30 minutes, these sources would not exceed the Noise standards established in the General Plan Noise Element. Therefore it is not expected that the proposed project would substantially increase noise levels over existing conditions and impacts would be less than significant.

Significance Level:
Less Than Significant with Mitigation

Mitigation:
Mitigation NOI-1
The project contractor shall implement the following measures during construction of the project:

- Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.

- Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the active project site.

- Locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the active project site during all project construction.

- Ensure that all general construction related activities are restricted to between the hours of 7:00 a.m. and 7:00 p.m. on Monday through Saturday and between the hours of 10:00 a.m. and 6:00 p.m. on Sundays and holidays.

- Designate a "construction coordinator" onsite, who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler) and would determine and implement reasonable measures warranted to correct the problem, and ensure noise levels do not exceed noise ordinance standards.

  Monitoring NOISE-1. Prior to issuance of grading or building permits, Permit Sonoma staff shall verify that the NOISE-1 measures are included on all site alteration, grading, building or improvement plans. The applicant shall submit documentation to Permit Sonoma staff that a Construction Coordinator has been designated and that appropriate signage has been posted including the Coordinator's phone number. Documentation may include photographic evidence or a site inspection, at the discretion of Permit Sonoma staff. Any noise complaints not immediately resolved by the Coordinator shall be investigated by Permit Sonoma staff. If violations are found, a noise consultant may be required at the applicant's expense to evaluate the problem and recommend corrective actions. Continuing or unresolved noise violations may result in an enforcement action and/or revocation or modification proceedings, as appropriate.

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

Comment:
Vibration refers to groundborne noise and perceptible motion. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Vibration energy propagates from a source, through intervening soil and rock layers, to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by the occupants as the motion of building surfaces, rattling of items on shelves or hanging on walls, or as a low-frequency rumbling noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings radiating sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 dB or less, an order of magnitude below the damage threshold for normal buildings.

Common sources of groundborne vibration and noise include trains and construction activities such as blasting, pile driving, and operating heavy earthmoving equipment. Construction of the proposed project would involve grading, site preparation, and construction activities but would not involve the use of construction equipment that would result in substantial groundborne vibration or groundborne noise on properties adjacent to the project site. No pile driving, blasting, or substantial grading activities are proposed. Furthermore, operation of the proposed project would not generate substantial groundborne noise and vibration. Therefore, the project would not result in the exposure of persons to or generation of excessive groundborne noise and vibration and the project impacts would be less than significant.

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 project site is located approximately 0.7 mile west of the Charles M. Schulz–Sonoma County Airport and is located within the Sonoma County Airport Industrial Area Specific Plan. The project site is located with the area of influence of the Sonoma County Airport as indicated in the Sonoma County Comprehensive Airport Land Use Plan[36] and is located with Safety Zone Traffic Pattern Zone (TPZ)-B. The project site is located within the Primary Referral Area boundary as shown on Exhibit C4 in the Airport Land Use Plan. The Primary Referral Area includes areas within the 55 CNEL noise contour for the Sonoma County Airport. However, this noise level would be within the County's normally acceptable noise level of 65 CNEL for industrial land uses. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels and impacts would be less than significant.

Significance Level:
Less Than Significant

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:

[3636] Sonoma, County of. Comprehensive Airport Land Use Plan. Website: https://permitsonoma.org/longrangeplans/adoptedlong-rangeplans/airportlanduseplan (accessed July 24, 2022)

The proposed project would include the construction of a light industrial building with office space and parking area. The proposed project would not result in direct population growth as the use proposed is not residential and would not contribute to permanent residency on site. Further, the proposed project is consistent with the General Plan's Limited Industrial (IL) land use designation and would not generate growth beyond that anticipated in the General Plan. Therefore, the proposed project would not directly or indirectly induce population growth and this impact would be considered less than significant.

Significance Level:
Less Than Significant

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

Comment:
The project consists of the development of a light industrial building on a vacant site that does not contain housing. Therefore, the project would not displace existing housing or require the construction of replacement housing and would result in no impact.

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 rations, response times or other performance objectives for any of the public services:

Comment:
The proposed project does not involve the construction of new housing. The project would create a modest demand for new employees (approximately 75 new employment opportunities). The increase in employment opportunities is not anticipated to result in an indirect increase in population, as it is anticipated that the employees would be existing residents of Sonoma County. Therefore, the proposed project would not require construction of new or physically altered governmental facilities.

Significance Level:
Less Than Significant

i. Fire protection?

Comment:
The Sonoma County Fire District (SOCO Fire) would provide fire protection services to the proposed project. SOCO Fire is comprised of Bennett Valley, Mountain Volunteer, Rincon Valley, Windsor, Russian River, Forestville and the Bodega Bay Fire Protection Districts. SOCO Fire provides fire, paramedic advanced life support/emergency medical, and emergency services to the unincorporated areas of the County. SOCO Fire has ten stations, with the closest fire stations to the project site being Fire Station 1, located at 8200 Old Redwood Highway (approximately 2 miles north of the project site) and Fire Station 2, located at 45 Lark Center Drive (approximately 2.3 miles southeast of the project site).

Planned growth under the General Plan would increase calls for fire protection service in the County. The project is consistent with the site's General Plan designation and does not represent unplanned growth given that the project site would be developed consistent with its land use and zoning

designations. The project could result in an incremental increase in the demand for fire protection services as a result of additional employees to the project site. However, the proposed project would be required to comply with all applicable codes for fire safety and emergency access. In addition, the project applicant would be required to submit plans to the County for review and approval prior to the issuance of building permits to ensure the project would conform to applicable adopted County Fire Safe Regulations (including 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). A fire impact fee is also mandatory for all projects in the subject area to ensure cumulative impacts to fire services remain below significant levels.

SOCO Fire would continue providing services to the project site and would not require additional firefighters to serve the proposed project. The construction of a new or expanded fire station would not be required. The proposed project would not result in a significant impact on the physical environment due to the incremental increase in demand for fire protection and life safety services. The incremental increase in demand for services is not expected to adversely affect existing responses times to the site or within the County. Therefore, construction and operation of the proposed project would have a less-than-significant impact on fire protection and safety services and facilities.

Significance Level:
Less Than Significant

ii. Police?

Comment:
The Sonoma County Sheriff's Office provides police protection to the project area and project site. The Sheriff's Office is comprised of over 650 employees and approximately 100 volunteers and is the responsible for primary law enforcement services for the unincorporated area, the Town of Windsor, and the City of Sonoma. The Sheriff's Office headquarters are located at 2796 Ventura Avenue, approximately 6 miles southeast of the project site. Planned growth under the General Plan would increase calls for police protection service in the County. The project is consistent with the site's General Plan designation and does not represent unplanned growth. The project could result in an incremental increase in the demand for police protection services; however, the project site would be required to comply with County regulations, by providing appropriate lighting for safety and security, including lighting throughout the parking lot and around the proposed building.

The Sonoma County Sheriff's Office would continue to provide services to the project site and would not require additional officers to serve the project site. The construction of new or expanded police facilities would not be required. Therefore, the proposed project would not result in a substantial adverse impact associated with the provision of additional police facilities or services, and impacts to police services represent a less-than-significant impact.

Significance Level:
Less Than Significant

iii. Schools?

Comment:
The proposed project will not generate student demand or otherwise impact school services given that there is no housing or a residential component. As such, there would be no impact.

Significance Level:
No Impact

iv. Parks?

Comment:
The proposed project would include the development of a new light industrial building on vacant land. The project does not include any residential uses and would not generate a need for additional park space. As such, there would be no impact.

Significance Level:
No Impact

v. Other public facilities?

Comment:
Development of the proposed project would not increase demand for other public services including libraries, community centers, and public health care facilities. As previously discussed, the project does not include development of residential uses and would therefore not result in increased demand for other public facilities. As such, there would be no impact.

Significance Level:
No Impact

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 would involve the development of a light industrial building and would not generate population growth that would result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. Therefore, there would be no impact to parks or recreational facilities that would occur as a result of the proposed project.

Significance Level:
No Impact

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 include recreational facilities or require the construction or expansion of recreational facilities. The project would involve the development of a light industrial and would not result in new, permanent population growth to the County necessitating the construction or expansion of recreation facilities. No impact related to this topic would occur and no mitigation is required.

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:
A Transportation Impact Study (TIS)[37] was completed by W-Trans in March 2022. This study found that the proposed project is expected to generate an average of 221 trips per day, including 22 a.m. peak hour trips and 23 trips during the p.m. peak hour.

Roadways. Because the project is an industrial use, consideration was given to the volume of truck traffic that would be expected during peak hours. According to the Trip Generation Manual data, the project would be expected to generate 3 truck trips during the morning peak hour (1 in, 2 out) and 4 during the evening peak hour (2 in, 2 out). Because trucks are larger and slower moving than passenger vehicles, they are typically treated using a passenger car equivalency (PCE) of three passenger vehicles per truck. The additional two trips per truck would increase the effective trip generation to 28 morning peak hour trips and 31 evening peak hour trips. The project would therefore be expected to generate more than 25 trips during both peak hours. The project would therefore be expected to generate more than 25 trips during both peak hours, indicating that a full traffic study is needed under the County's guidelines. As described above, a TIS was prepared for the proposed project; therefore, the project would be in compliance with County requirements relative to the roadway system.

Pedestrian Facilities. Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities such as lighting, benches, etc. In general, a network of sidewalks, crosswalks, pedestrian signals, and curb ramps provide access for pedestrians in the vicinity of the project site.

- Airport Boulevard – Continuous sidewalk coverage is provided on Airport Boulevard between the transit stops west of Brickway Boulevard and the US 101 interchange. Curb ramps and signalized crosswalks exist at the intersection with Brickway Boulevard. Lighting is provided by overhead street lights.

- Brickway Boulevard – Continuous sidewalk coverage is provided on the west side of Brickway Boulevard between Airport Boulevard and the project site, allowing access to transit stops at Airport Boulevard/Brickway Boulevard. Sidewalks would be constructed along the project frontage. Lighting is provided by overhead street lights.

- Copperhill Parkway – Continuous sidewalks are provided on the north side of Copperhill Parkway between North Laughlin Road and the project site. Sidewalks are planned along the project frontage. There are intermittent street lights on this road, while overhead lights exist in all the parking lots along this road.

The use of existing sidewalks on Brickway Boulevard and Copperhill Parkway along with planned sidewalks along the project frontages would provide adequate access between the project site and nearby transit stops or other destinations.

Bicycle Facilities. The Highway Design Manual, Caltrans, 2020, classifies bikeways into four categories:

- Class I Multi-Use Path – a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.

- Class II Bike Lane – a striped and signed lane for one-way bike travel on a street or highway.

- Class III Bike Route – signing only for shared use with motor vehicles within the same travel lane on a street or highway.

- Class IV Bikeway – also known as a separated bikeway, a Class IV Bikeway is for the exclusive use of bicycles and includes a separation between the bikeway and the motor

[37] W-Trans. 2022. *Draft Transportation Impact Study for the LogistiCenter at Santa Rosa*. March 17.

vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

In the project area, Class II bike lanes exist on Airport Boulevard between Ordinance Road and the US 101 interchange, with bike lanes proposed to provide connectivity with the residential area east of the interchange. Class II bike lanes are also proposed on Brickway Boulevard between Airport Boulevard and River Road. Bicyclists ride in the roadway and/or on sidewalks along all other streets within the project study area.

Existing bicycle facilities, including bike lanes on Airport Boulevard, together with shared use of minor streets provide adequate access for bicyclists. Consistent with County code requirements, bicycle parking should be supplied at a rate of one space per five required vehicle parking spaces to meet County code requirements. Since 94 vehicle parking spaces are proposed, the proposed project would be required to supply 19 bicycle parking spaces. Compliance with exiting County regulations would ensure that impacts related to provision of bicycle facilities would be less than significant.

Transit Facilities. Sonoma County Transit (SCT) provides fixed route bus service throughout Sonoma County. SCT Route 62 provides service between Santa Rosa and Windsor and stops on Airport Boulevard at Brickway Boulevard. Route 62 operates on weekdays between 8:00 a.m. and 7:00 p.m. with headways of approximately two hours. Two or three bicycles can be carried on most SCT buses. Bike rack space is on a first come, first served basis. Additional bicycles are allowed on SCT buses at the discretion of the driver.

Dial-a-ride, also known as paratransit, or door-to-door service, is available for those who are unable to independently use the transit system due to a physical or mental disability. Sonoma County Paratransit is designed to serve the needs of individuals with disabilities within the County.

The proposed project is expected to have an imperceptible effect on local transit service. Existing transit routes are adequate to accommodate project-generated transit trips, and existing stops are within an acceptable walking distance of the site. Therefore, the proposed project

Because the project is consistent with existing and planned pedestrian, bicycle, and transit facilities, implementation of the proposed project would not conflict with any adopted policies, plans, or programs regarding bicycle or pedestrian facilities, and the impact would be less than significant.

Significance Level:
Less Than Significant

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

Comment:
Senate Bill (SB) 743 established the change in Vehicle Miles Traveled (VMT) as a result of a project as the basis for determining impacts with respect to transportation and traffic under the California Environmental Quality Act (CEQA). As of the date of this analysis, the County of Sonoma has not yet established thresholds of significance related to VMT. As a result, the project-related VMT impacts were assessed based on guidance provided by the California Governor's Office of Planning and Research (OPR) in the publication Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, 2018.

OPR provides guidance for VMT analysis based on VMT per capita for residential projects and VMT per worker for employment-based projects. Since the VMT associated with the proposed project would be primarily associated with employment-based travel, VMT per employee was used as the metric for this analysis. Projects that generate vehicle travel exceeding 15 percent below the existing regional average VMT per employee may indicate a significant transportation impact. OPR guidance states that a county is an appropriate geographical boundary for a baseline if that is the area within which workers of the project would be expected to live. Employees of the proposed project are expected to reside within the County of Sonoma so countywide data was used to establish the

baseline VMT per employee.

Based on data from the recently updated Sonoma County Transportation Authority (SCTA) travel demand model, the County of Sonoma has a baseline average VMT of 12.53 miles per employee. Applying OPR's guidance, an employment-based project generating a VMT that is 15 percent or more below this value, or 10.65 miles per employee, would have a less-than-significant VMT impact. The SCTA model includes traffic analysis zones (TAZ) covering geographic areas throughout Sonoma County. The project site is located within TAZ 92, which has a baseline VMT per employee of 9.94 miles, which is below the significance threshold. Therefore, the project as proposed would be expected to result in a less-than-significant VMT impact.

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 be located near similar uses and would be accessed from roadways where trucks are already common. The draft TIS prepared for the proposed project evaluated the adequacy of sight distance and need for turn lanes at the project access(es) as well as the adequacy of stacking space in dedicated turn lanes at the study intersections to accommodate additional queuing due to adding project-generated trips and need for additional right-of-way controls.

The site would be accessed via two proposed driveways, with one each on Brickway Boulevard and Copperhill Parkway. The sight distance analysis prepared as part of the TIS found that based on posted speed limits on Brickway Boulevard and Copperhill Parkway, sight lines to and from the proposed driveways would be more than adequate. However, the sight distance analysis also stated that sight lines can be blocked by signing and tall landscaping. With inadequate sight distance, it would be more difficult for vehicles exiting the driveways to choose an appropriate time to enter the roadway, and this condition could present a potential significant hazard. Implementation of Mitigation Measure TRA-1 would preserve sight distance and impacts due to design features would be reduced to a level of less than significant with mitigation.
.
Based on anticipated traffic volumes in the 2040 plus project conditions, left-turn lanes on Brickway Boulevard and Copperhill Parkway would not be warranted. The detailed warrant analysis is included in the TIS.

Under the County's policy, an impact on projected 95th percentile queues shall be considered significant if the projected queue can be accommodated within the available stacking in a dedicated turn lane without the project, but would exceed the available stacking upon adding project-generated traffic or if there is adequate sight distance between the end of the queue and following traffic without the project, and the addition of project traffic increases the queue to a point where sight lines are no longer adequate to meet stopping sight distance criteria. Under each scenario evaluated in the TIS, the proposed project would not impact queue lengths.

Significance Level:
Less Than Significant with Mitigation

Mitigation:
Mitigation TRA-1: The landscaping plan shall indicate line-of-sight triangles from the project driveways to points on Brickway Boulevard 250 feet from the driveway and on Copperhill Parkway 155 feet from the driveway. The landscaping plan shall indicate that plants and objects located within these sight triangles shall be below three feet in height, so to not obstruct the view of vehicles exiting the driveways.

Monitoring TRA-1: permit Sonoma staff shall verify that the TRA-1 measures are included on the proposed landscape plans prior to issuance of grading or building permits.

d) Result in inadequate emergency access?

Comment:
Each proposed driveway would be 32 feet wide, which exceeds the minimum required width of 2 feet for fire access. The drive aisle for trucks would be 30 feet wide, and the drive aisle for passenger vehicles would be 26 feet wide. Emergency vehicles could access the project site through either proposed driveway and would have continuous access throughout the site via the drive aisle loop. Based on the proposed site plan, access and onsite circulation would be adequate to accommodate turning movements for emergency vehicles and trucks.

As described in the TIS, the project would be expected to result in nominal changes in delay for vehicles traveling along Airport Boulevard, so emergency response times would similarly be minimally affected. Airport Boulevard has four through travel lanes so emergency responders traveling with their lights and sirens would reasonably be expected to have a clear path of travel as drivers pull to the right to let them pass. Therefore, the project would be expected to have a less-than-significant impact on emergency access and response

Significance Level:
Less Than Significant

18. TRIBAL CULTURAL RESOURCES:

Would the project:

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

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

Comment:
The California Historical Resources Information System (CHRIS) maintains a wide range of documents and materials relating to historical resources (e.g., buildings, structures, objects, historic and archaeological sites, landscapes, districts). The CHRIS operates structurally through the California Office of Historic Preservation (OHP), nine Information Centers (ICs), and the State Historical Resources Commission (SHRC).

On December 9, 2021, Permit Sonoma referred the project application to the Northwest Information Center (NWIC) for comments and recommendations, and to Native American Tribes within Sonoma County for consultation under AB-52.

The Northwest Information Center has since responded to the County's project referral specifying that the proposed project area has a low possibility of containing unrecorded archaeological site(s), and that no further study for archaeological resources is recommended.

Representatives from California Native American tribes within the local and regional area have also responded to the County's project referral requesting no further consultation under AB 52, pursuant to Public Resources Code section 21080.3.1.

As part of the cultural resources study,[38] a records search at the NWIC was conducted, which included review of all recorded historic and prehistoric archaeological sites within 1 mile of the project, as well as a review of known cultural resource survey and excavation reports. A review of aerial photographs and maps a pedestrian survey of the project area, and a Native American Sacred Lands File Search through the Native American Heritage Commission (NAHC) were also conducted. As described in Section 5, Cultural Resources, no California Native American tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in Public Resources Code section 5020.1(k), have been previously documented or were currently identified within or adjacent to the project area.

As described in Section 5, Cultural Resources, although no tribal cultural resources or burial sites are known in the vicinity of the project site, such resources could be discovered during ground disturbing activities associated with project construction. Implementation of the County's standard "accidental discovery" condition of approval, which shall be implemented in the event of an inadvertent discovery, would reduce the potential impact to less than significant as discussed above in Section 5.a.

Significance Level:
Less Than Significant

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 18.a. above.

Significance Level:
Less Than Significant

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:
The Sonoma County Water Agency (Sonoma Water) manages and operates eight different sanitation zones and districts throughout Sonoma County. The project site is located within the Airport/Larkfield/Wikiup Sanitation Zone. The proposed project would include installation of new sewer lines that would be installed within the drive aisles of the surface parking lot and would connect to the existing lines in Brickway Boulevard. The new sanitary sewer line installed on the project site would be constructed in conformance with County standards, and its construction would not cause significant environmental effects.

As described below, the Windsor Water District (WWD) provides water service to Windsor and surrounding areas including the project site. WWD's current 2015 Urban Water Management Plan (UWMP) describes the existing and planned sources of water available in the water system service area through the year 2040. The UWMP has determined that water supplies would be adequate

[38] LSA. 2022. *Cultural Resources Assessment*. April.

during normal year, single-dry year, and multiple-dry year scenarios through the 2040 based on the development of the land uses within the WWD plan area. The proposed project would not substantially increase demand for water and would therefore not exceed the capacity of existing water treatment facilities. The proposed project would not require the construction of new water treatment facilities, or the expansion of existing facilities, other than those already planned as part of the UWMP. The proposed project would include the installation of new water lines connecting to the existing water service line located within Brickway Boulevard. The proposed project would connect directly to existing mains, which have sufficient capacity to accommodate the proposed project. Therefore, the impact of the proposed project on water infrastructure would be less than significant.

The proposed storm water drainage system on the project site would be composed of inlets in the surface parking lot which would connect and convey storm water to proposed bio-retention facilities along the site's western and northern boundaries. These bio-retention facilities would be developed to achieve the 100 percent volume capture for the 85th percentile precipitation event in accordance with the Priority 1 objective of the City of Santa Rosa's LID Technical Design Manual. Therefore, the impact of the proposed project on storm water infrastructure would be less than significant.

The proposed project would include connections to the existing electricity lines and natural gas line that run along Brickway Boulevard.

Therefore, because the proposed project would connect to existing utility services within or adjacent to the project site, the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities would not be required. Impacts would be less than significant.

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:
The WWD would provide both potable and non-potable water to the project site through infrastructure located in Brickway Boulevard. The WWD's water supply sources include Russian River surface water, groundwater, and recycled water. Of the groundwater sources, some are potable, while others are considered "raw" (untreated) and non-potable. The majority of the potable water supply consists of surface water from the Russian River Well Field, which diverts water under the Sonoma County Water Agency's (Water Agency) diversion rights. WWD also purchases surface water directly from the Water Agency, which is delivered into the distribution system through the Water Agency's Santa Rosa Aqueduct.

The current 2015 Urban Water Management Plan (UWMP)[39] describes the existing and planned sources of water available in the water system service area through the year 2040. The 2015 UWMP has determined that water supplies would be adequate during normal year, single-dry year, and multiple-dry year scenarios through the 2040 based on the development of the land uses within the WWD plan area, which include development of industrial use on the project site. Therefore, WWD would provide sufficient water supplies to the proposed project for the foreseeable future during normal, dry, and multiple dry year scenarios and this impact would be less than significant.

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 inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

[39] GHD. 2016. Final 2015 Urban Water Management Plan for the Town of Windsor Water District. June.

Comment:
Sonoma Water provides sewer treatment service to via eight different sanitation zones and districts throughout Sonoma County. The project site is located within the Airport/Larkfield/Wikiup Sanitation Zone (ALWSZ). The ALWSZ service area comprises 2,100 acres and serves a population of approximately 9,000 (3,818 single-family dwelling unit equivalents). The collection system, constructed in the 1980s and 1990s, includes 43.5 miles of sewers (38.4 miles of gravity sewer mains ranging in size from 6 to 24 inches, 0.1 mile of force mains, and 5 miles of service laterals for which Sonoma Water is responsible) and one pump station. The ALWSZ treatment plant is designed to treat an average dry weather flow (ADWF) of 900,000 gallons per day (gpd) to advanced (tertiary) wastewater treatment standards. All the recycled water is used for irrigation.[40] As part of the Airport Industrial Specific Plan, an assessment district was established to ensure that sewer system facilities within the plan area would accommodate build-out demand. Wastewater generated by the proposed project was anticipated as part of development of sewer system master plan for the Airport Industrial Specific Plan. Therefore, the proposed project would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project demand. Impacts would be less than significant.

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 an existing waste management program that provides solid waste collection and disposal services for the entire County. Republic Services of Sonoma County, Inc. operates a large Central Landfill, located outside of Petaluma as well as four smaller transfer stations, located in Annapolis, Guerneville, Healdsburg, and Sonoma. The Central Landfill is a Class III facility that accepts municipal solid waste, as well as biosolids, wood waste, industrial waste, construction/demolition debris and agricultural waste.

The jurisdictions in Sonoma County have collectively adopted regional goals for waste reduction, reuse, and recycling to meet Statewide diversion goals. These goals are stated in the Countywide Integrated Waste Management Plan as well as the Sonoma County Regional Climate Action Plan (CAP).

Construction of the proposed project would generate a small amount of solid waste. The majority of the construction waste would be dirt and paving materials, as well as waste generated by construction workers. The generation of construction waste would be temporary, would cease when construction is complete, and would not be substantial. Construction debris would be recycled and/or disposed of at one of the four transfer stations within the County or the Central Landfill. These facilities have the capacity to handle the nominal amount of construction waste generated by the proposed project. Therefore, construction of the proposed project would result in a less than significant impact to solid waste and landfill facilities.

Implementation of the proposed project would generate approximately 1,835 pounds of solid waste per day or about 331 tons of solid waste per year.[41] As of February 2020, the Central Landfill had remaining capacity of 9.2 million cubic yards, with a total capacity of 32.6 million cubic yards.[42] Given the available capacity at the landfill, the additional solid waste generated by the proposed project is not anticipated to cause the facility to exceed its daily permitted capacity. In addition, implementation

[40] Woodard & Curran. 2021. Airport-Larkfield-Wikiup Sanitation Zone Sewer System Management Plan (SSMP). January.
[41] CalRecycle, 2019. Solid Waste Generation Rates. Website: www2.calrecycle.ca.gov/WasteCharacterization/General/Rates (accessed January 31, 2023).
[42] CalRecycle, 2022. Facility/Site Summary Details: Central Disposal Site (49-AA-0001). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1224?siteID=3621 (accessed January 31, 2023).

of the County's recycling programs and compliance with State regulations for waste diversion would further reduce solid waste generation and would ensure there is sufficient capacity to accommodate the proposed project at the Central Landfill. As such, the project would be served by a landfill with sufficient capacity to accommodate the project's waste disposal needs, and impacts associated with the disposition of solid waste would be less than significant.

Significance Level:
Less Than Significant

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

Comment:
The California Integrated Waste Management Act of 1989 (AB 939) reorganized solid waste disposal planning within the State of California. The legislation required every county to adopt an Integrated Waste Management Plan (CoIWMP) describing local waste diversion and disposal conditions, as well as creating programs to meet State goals for diverting waste from landfills. Mandatory diversion goals require diversion of 25 percent of waste from landfills by 1995 and 50 percent by 2000 and maintaining 50 percent thereafter. The County is part of the Sonoma County Waste Management Agency, which was created after AB 939 was passed. As of 2006, the Sonoma County Waste Management Agency met the exceeded the 50 percent diversion rate of waste from landfills, diverting 64 percent of waste. In 2008, the California Integrated Waste Management Board (now part of the Department of Conservation's Division of Recycling) updated the system for determining diversion goals for each city. At present, per capita landfill disposal limits are determined each year and the Sonoma County Waste Management Agency works with jurisdictions to meet these goals.

As described in Section 19.d, implementation of the project would generate solid waste associated with construction activities. To the extent possible, solid waste would be recycled either on-site or transported to a local disposal center for recycling. The proposed project would be required to comply with management and reduction statutes and regulations related to disposal of solid waste. This impact would be less than significant.

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 within any State responsibility areas (SRA) for fire service and is not within a very high fire hazard severity zone. In addition, as noted in Section 9.f, the proposed project would not impair the implementation of, or physically interfere with, an adopted emergency response plan and no impact would occur.

The proposed project would be designed to provide adequate access to the site for fire/police/emergency medical service personnel in the event of an emergency at the project site. In the event of an emergency on the site, employees and patrons could exit the site proposed driveways on Brickyard Boulevard and Copperhill Parkway. Once off the project site, employees and patrons could exit the area via traveling east on Airport Avenue and accessing U.S. 101 to exit the region. As the proposed project would be site specific with no improvements occurring to the local roadway system, it would not substantially impair an adopted emergency response plan or emergency

evacuation plan.

Significance Level:
Less Than Significant

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

Comment:
The project site would be located on a parcel that is relatively flat and not near any slopes. The proposed project is located in an area that is predominantly occupied by commercial and industrial uses. Prevailing winds are typically from the west from March to October and from the north from October to March. Finally, the proposed project would not include any design features that would increase the potential for a wildfire. The proposed project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Significance Level:
Less Than Significant

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 proposed project would be developed on a vacant parcel within an area that is mainly occupied by industrial and commercial businesses. The project would develop a light industrial building and no off-site improvements would occur with implementation of the proposed project. The proposed project would connect to existing off-site utility infrastructure. Overall, the proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

Significance Level:
Less Than Significant

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

Comment:
The proposed project is located on a parcel that is relatively flat and the surrounding off-site area is relatively flat as well. Prominent sloped areas are located approximately 4.5 miles to the south-southwest of the project site. Based on the location of the proposed project, the site's susceptibility to downstream flooding or landslides as a result of runoff from post-fire slope instability or post-fire drainage changes would be low. As such, the proposed project would not expose people or structures to such significant risks associated with post-fire conditions and this impact would be less than significant.

Significance Level:
Less Than Significant

21. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the

number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Comment:
Implementation of the mitigation measures recommended in this IS/MND would ensure that the construction and operation of the proposed project would not substantially degrade the quality of the environment; reduce the habitat, population, or range of a plant or animal species; or eliminate important examples of California history or prehistory. As described in Section 4, Biological Resources the proposed project would not result in impacts to biological resources, with the exception of potential impacts to special-status plants, CTS, wetlands, and nesting birds. Implementation of Mitigation Measures BIO-1 through BIO-4 would reduce potential impacts to a less-than-significant level. As discussed in Section 5, Cultural Resources, in the event that unanticipated archeological/historical/paleontological resources and/or human remains are identified in the project area during construction, implementation of the County's standard "accidental discovery" condition of approval would reduce potential impacts to a less-than-significant level.

Significance Level:
Less Than Significant with Mitigation

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 CEQA Guidelines require a discussion of significant environmental impacts that would result from project-related actions in combination with "closely related past, present, and probably future projects: located in the immediate vicinity (CEQA Guidelines Section 15130[b][1][A]). Cumulative environmental impacts are those impacts that by themselves are not significant, but when considered with impacts occurring from other projects in the vicinity would result in a cumulative impact. Related projects considered to have the potential of creating cumulative impacts in association with the proposed project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the proposed project. The proposed project would be located in a highly developed urban area that is largely built out.

The proposed project's impacts would be individually limited and not cumulatively considerable. The potentially significant impacts that can be reduced to a less than significant level with implementation of recommended mitigation measures include the topics of air quality, biological resources, noise, and transportation. These impacts would primarily be related to construction-period activities, would be temporary in nature, and would not substantially contribute to any potential cumulative impacts associated with these topics. For the topic of air quality, potentially significant impacts to air quality standards associated with project construction would be reduced to less than significant levels with implementation of Mitigation Measure AIR-1. For the topic of biological resources, implementation of Mitigation Measures BIO-1 through BIO-4 would ensure that impacts to special-status plants, CTS, wetlands, and nesting birds are reduced to a less than significant level. For the topic of construction noise, implementation of Mitigation Measure NOI-1 would ensure that sensitive noise receptors are not impacted during project construction activities. For the topic of transportation, potentially significant impacts associated with safety would be reduced to less than significant levels with implementation of Mitigation Measure TRA-1.

For the topics of aesthetics, agricultural and forestry resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, tribal cultural resources, utilities and service systems, and wildfire, the project would have no impacts or less than significant impacts and, therefore, would not substantially contribute to any potential cumulative impacts for these topics. All environmental impacts that could occur as a result of the proposed

project would be reduced to a less than significant level through the implementation of the mitigation measures recommended in this document.

Implementation of these measures would ensure that the impacts of the project would be below established thresholds of significance and that these impacts would not combine with the impacts of other cumulative projects to result in a cumulatively considerable impact on the environment as a result of project development. Therefore, this impact would be less than significant with mitigation incorporated.

Significance Level:
Less Than Significant with Mitigation

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

Comment:
The proposed project would not result in environmental effects that would cause substantial direct or indirect adverse effects to human beings. No impact would occur.

Significance Level:
No Impact