Initial Study/Mitigated Negative Declaration
Dowdell Industrial Park Project

Prepared for:

City of Rohnert Park
Development Services
130 Avram Avenue
Rohnert Park, CA 94928-2486
Contact: Suzie Azevedo

Prepared by:

DUDEK
1102 R Street
Sacramento, California 95811
Contact: Christine Kronenberg, AICP

MAY 2020

Printed on 30% post-consumer recycled material.

Table of Contents

APPENDICES

FIGURES

TABLES

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ABAG	Association of Bay Area Governments
AFY	acre-feet per year
APN	Assessor's Parcel Number
ATC	ATC Group Services LLC
BA	Biological Assessment
BAAQMD	Bay Area Air Quality Management District
CAAQS	California Ambient Air Quality Standards
CAPCOA	California Air Pollution Control Officers Association
CAR	Climate Action Reserve
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFDW	California Department of Fish and Wildlife
CH_4	methane
CHRIS	California Historical Resources Information System
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CRHR	California Register of Historical Resources
CTS	California Tiger Salamander
DOC	California Department of Conservation
DPS	Department of Public Safety
DTSC	Department of Toxic Substances Control
EI	Expansion Index
EIR	Environmental Impact Report
EMP	Emergency Management Plan
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
EV	electric vehicle
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	Global Warming Potential
IPCC	Intergovernmental Panel on Climate Change
IS/MND	Initial Study/Mitigated Negative Declaration
LID	Low Impact Design
LOS	level of service
LRA	local responsibility area
LUST	leaking underground storage tank

Acronym/Abbreviation	Definition
MGD	million gallons per day
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MS4	municipal separate storm sewer system
MT CO_2e	metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_x	oxides of nitrogen
NO_2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
O_3	ozone
OAA	Ostergaard Acoustical Associates
OEHHA	Office of Environmental Health Hazard Assessment
PM	particulate matter
PM_{10}	particulate matter less than or equal to 10 microns in diameter
$PM_{2.5}$	particulate matter less than or equal to 2.5 microns in diameter
PRC	Public Resources Code
QA/QC	quality assurance/quality control
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCT	Sonoma County Transit
SCWA	Sonoma County Water Agency
SFBAAB	San Francisco Bay Area Air Basin
TAC	toxic air contaminant
TCR	tribal cultural resource
TIS	Traffic Impact Study
UGB	Urban Growth Boundary
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VMT	vehicle miles traveled
VOC	Volatile Organic Compounds
WELO	water efficient landscape ordinance

1 Introduction

1.1 Project Overview and Location

The Dowdell Industrial Park project ("proposed project") proposes to construct two concrete tilt-up buildings for light manufacturing, warehouse, or research and development uses located at the southwest corner of Business Park Drive and Dowdell Avenue in the City of Rohnert Park, California, as shown on Figure 1, Regional Location. The project site is approximately 10.3-acres (Assessor's Parcel Number (APN) 143-040-134) bordered by Business Park Drive to the north, Dowdell Avenue and undeveloped land to the east, undeveloped land and apartments (Fiori Estates) to the south, and industrial uses to the west. Undeveloped land is located north of Business Park Drive with the Graton Resort, Casino is located to the northwest, and a self-storage facility located to the northeast, as shown on Figure 2, Project Location.

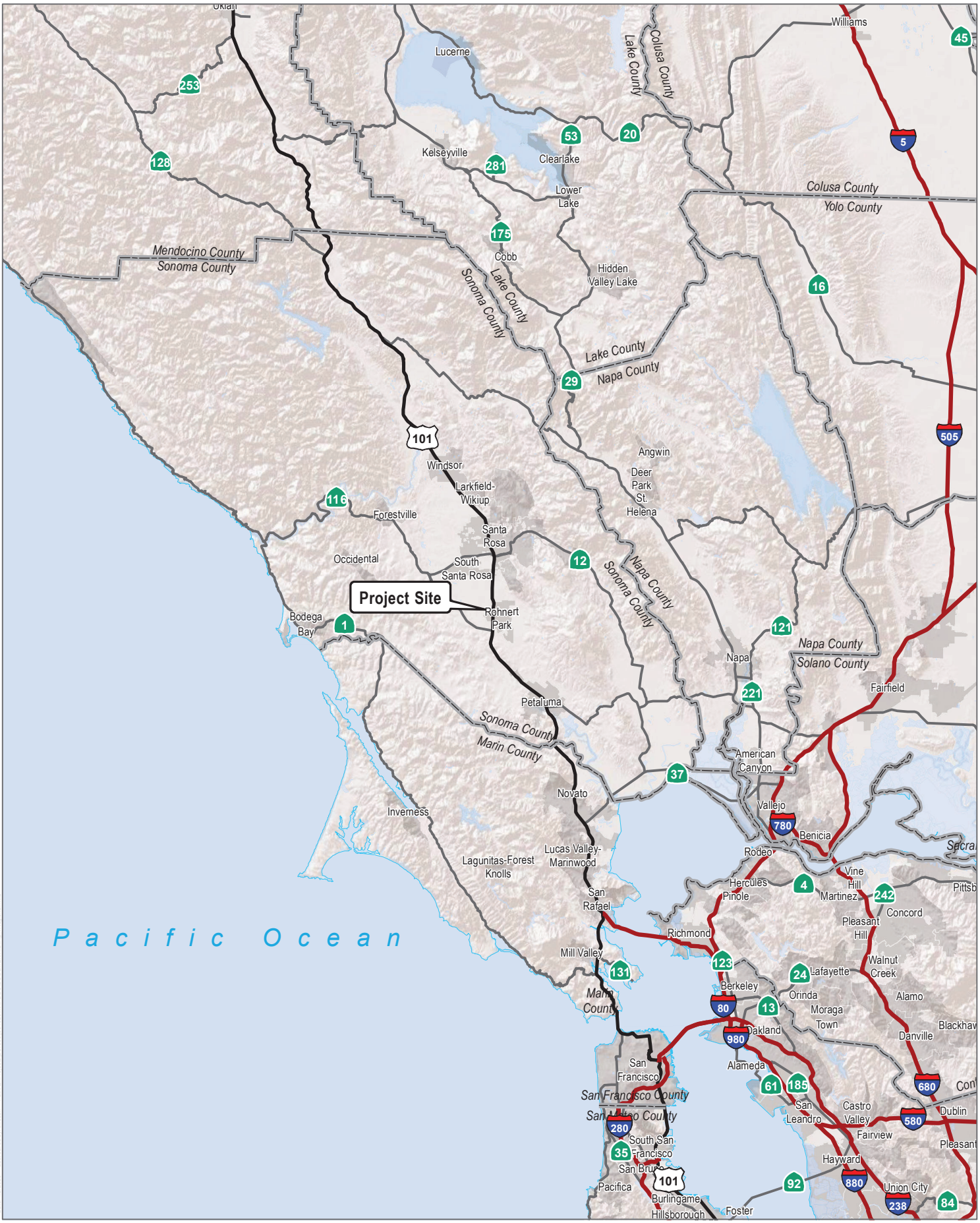
1.2 California Environmental Quality Act Compliance

This Initial Study has been prepared per the requirements of the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code [PRC] Section 21000, et seq.), and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.). The City of Rohnert Park ("City") is the lead agency for the project and would approve the project and adopt the Mitigated Negative Declaration (MND).

1.3 Public Review Process

The Initial Study and proposed MND will be circulated for public review for a period of 30 days, pursuant to CEQA Guidelines Section 15073(a). The City of Rohnert Park will provide public notice at the beginning of the public review period.

INTENTIONALLY LEFT BLANK



SOURCE: ESRI 2020

DUDEK

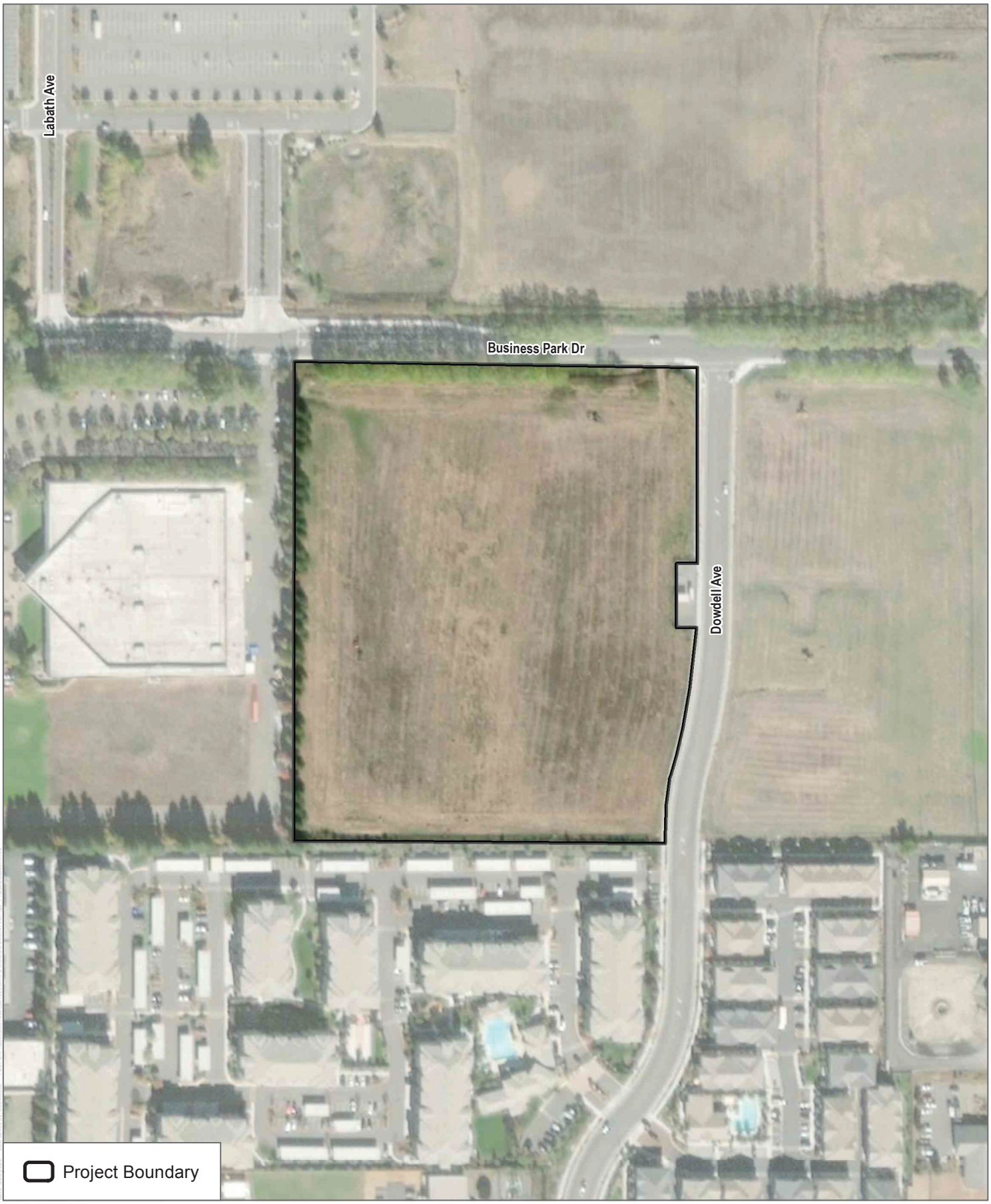
0 31,000 62,000 Feet

FIGURE 1

Regional Location

Dowdell Industrial Park Project

INTENTIONALLY LEFT BLANK



SOURCE: ESRI 2018

DUDEK

0 100 200 Feet
0 25 50 Meters
1:2,400

FIGURE 2

Project Location

Dowdell Industrial Park Project

INTENTIONALLY LEFT BLANK

2 Summary of Findings

2.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project. All of the impacts can be reduced to a less-than-significant level with mitigation measures identified in the following checklist.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology and Soils	☒ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☐ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

2.2 Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

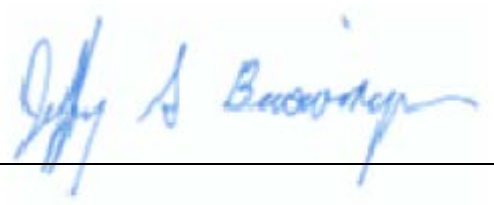
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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



Signature

5-15-2020

Date

3 Initial Study Checklist

1. **Project title:**

   Dowdell Industrial Park Project

2. **Lead agency name and address:**

   City of Rohnert Park
   Development Services
   130 Avram Avenue
   Rohnert Park, California 94928-2486

3. **Contact person and phone number:**

   Suzie Azevedo, Planner I
   707.588.2236

4. **Project location:**

   SW Corner of Dowdell Avenue and Business Park Drive (No address assigned yet)
   APN: 143-040-134

5. **Project sponsor's name and address:**

   Jim Damrell, Panattoni Development Company Inc.
   8775 Folsom Blvd., Suite 200
   Sacramento, California 95826

6. **General plan designation:**

   Industrial

7. **Zoning:**

   I-L: Industrial

8. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

   None

9. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

The only Native American tribe that has requested consultation is the Federated Indians of Graton Rancheria (Tribe). The City sent a letter to the Tribe on October 31, 2019, pursuant to AB 52. The City met with the Tribe on November 6, 2019, regarding the project.

10. **Description of project**

The project proposes to construct two concrete tilt-up buildings for light manufacturing, warehouse, or research and development uses on a 10.3-acre site. Each building would be approximately 90,000 square feet (sf) for a total of approximately 180,000 sf of building space. A total of 289 parking spaces would be provided.

Project Location and Site Characteristics

As shown on Figure 1, Regional Location, the project site is located in the City of Rohnert Park, Sonoma County, California. The site is situated in the northwest portion of the City on vacant land at the intersection of Dowdell Avenue and Business Park Drive. A row of planted sycamore trees occur along the northern site boundary adjacent to Business Park Drive and a row of coast redwood trees on the western property boundary. These trees will remain through construction. No buildings are present on the site.

The project site is mostly flat with an elevation range of about 95 to 102 feet above mean sea level. Historically, the site has been altered by agriculture, placement of fill, and grading activities associated with development of land located on the east side of the project site. Figure 2, Project Location provides an aerial overview of the proposed site.

Sonoma County Transit (SCT) is the principal transit service in northwest Rohnert Park. The project site is served by two bus stops through SCT. One stop is located 0.18 mile from the site near the intersection of Business Park Drive and Redwood Drive. The second stop is also located 0.18 mile from the site near the intersection of Martin Avenue and Labath Avenue.

Surrounding Land Uses and Setting

The project site is located in a developing part of the City. A mix of land uses surround the project site, including multi-family residential, office, agricultural, commercial, industrial, and vacant lots. The following land uses are located in the vicinity of the project site:

- North of the site is primarily agricultural land, as well as tribal lands of the Federated Indians of Graton Rancheria (which includes the Graton Rancheria Casino) to the northwest.
- East of the site is undeveloped land.
- South of the site is the Fiori Estates Apartments.
- West of the site are industrial/commercial parcels.

Project Characteristics

The project applicant is proposing to develop the site with two industrial buildings with uses ranging from light manufacturing to research and development. Figure 3, Site Plan shows the proposed layout for the buildings and associated parking. As shown on the site plan, the proposed buildings would be constructed as a "cold shell". This means that the buildings would be constructed with an unfinished interior and lack heating, ventilation, and air conditioning. Future tenants would purchase space in the building, and would be responsible for tenant improvements depending on how they plan to use the space. The project applicant has provided "potential future office" locations on their site plans to depict how this could look. As shown on Figure 3, loading dock spaces are proposed internal to the site at the rear of the buildings with vehicle parking around the perimeter of the site.

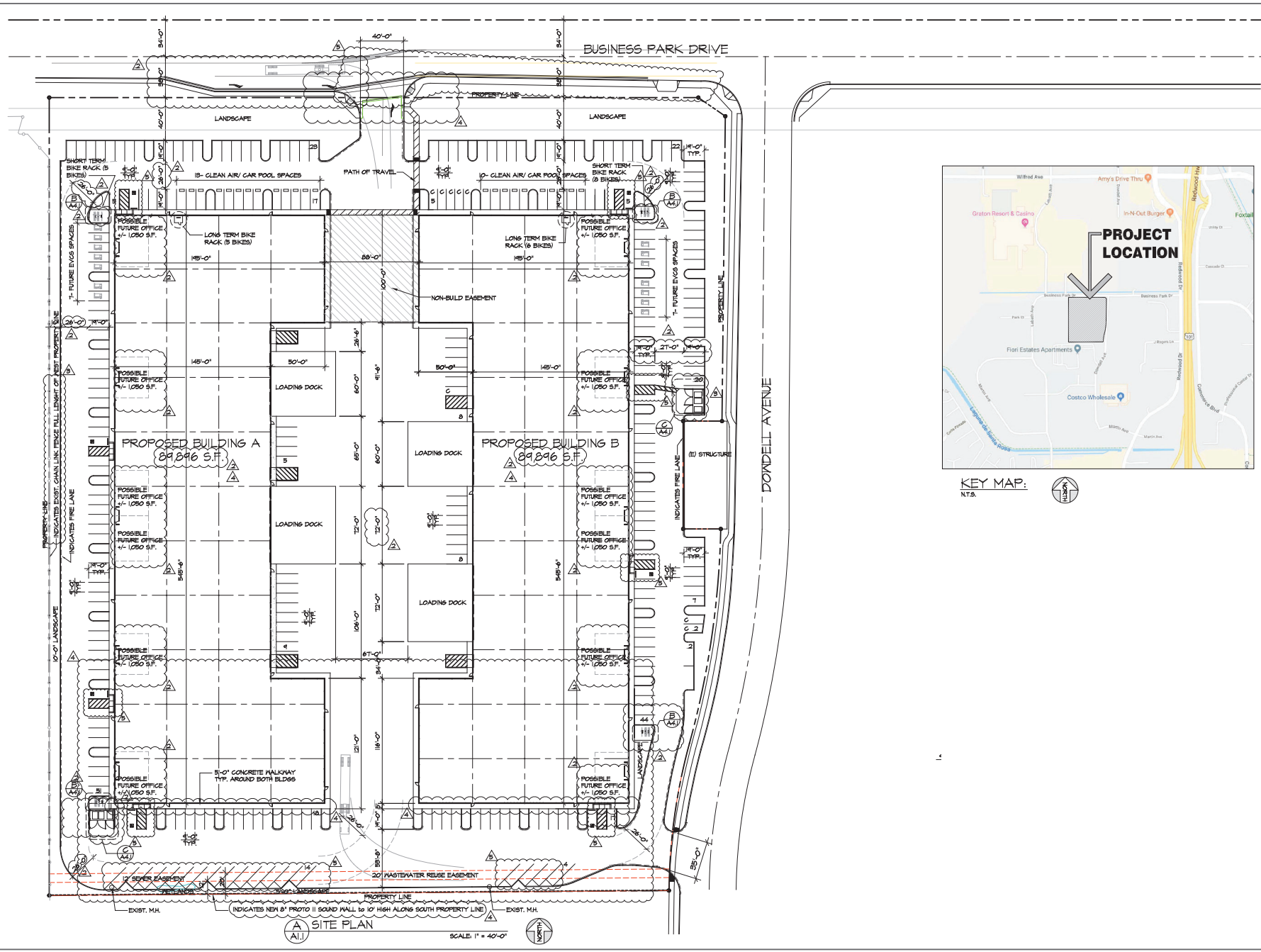
Access to the site would be provided from Dowdell Avenue and Business Park Drive, as shown on Figure 3. The project proposes to construct two curb cuts for vehicle access from Dowdell Avenue and Business Park Drive. The first 35-foot wide entrance is located on the southeast corner of the project site and Dowdell Avenue. This entrance would provide access to the parking lot and loading docks. The primary entrance would be from Business Park Drive and would provide a right-turn in and right-turn out only. This 40-foot wide entrance is located on the north side of the project site, as depicted on Figure 3. The project applicant is proposing to construct a right turn pocket at the entrance off Business Park Drive.

The proposed parking lot surrounds the entire site and includes extra parking on the interior adjacent to the loading docks. The project applicant is proposing to include a total of 289 parking spaces, which includes 8 compact spaces, 7 accessible parking, 23 clean air/van pool spaces, and 14 future electric vehicle (EV) charging stations. In addition, two bicycle racks are provided in the northern portion of the site. Two trash enclosures would also be located at the southern portion of the site. The parking lot would also include a ten-foot tall concrete masonry sound wall proposed along the southern boundary to minimize potential noise impacts to nearby residences.

The project applicant is proposing a wide variety of landscape improvements surrounding the site. A combination of trees, shrubs, groundcover, and bio-infiltration plants would be used to meet the City of Rohnert Park's landscaping requirements. The proposed plant palette contains native and adaptive, low water use varieties that are well-suited to the climate. As stated previously, a row of existing redwoods and sycamores would remain on the northern and western property lines. In addition, the project proposes planting 69 new trees including crape myrtle, Chinese pistache, London plane, and Frontier elms.

Plants would be grouped into zones with similar water demand requirements and all planter areas would be covered in 3-inches of mulch. The site would also provide multiple bio-retention areas on the north and east side of the project site. Groundcover and shrubs would surround the proposed trees to fill out the site and complete the landscaping. All proposed landscaping would be irrigated through a fully automatic system that meets current water efficient landscape ordinance (WELO) requirements.

INTENTIONALLY LEFT BLANK



SOURCE: GBDH Design, INC.

DUDEK

FIGURE 3

Site Plan

Dowdell Industrial Park Project

INTENTIONALLY LEFT BLANK

Water

The project would tie into the City's water system. Existing water mains are located in the streets adjacent to the project site. Two points of connection to the water system are proposed. One connection would tie into the existing 8-inch waterline on Business Park Drive to the north. The second connection point would tie into the existing 12-inch waterline in Dowdell Avenue to the east.

Based on the water study conducted by Morton Pitalo, the project site is assumed to have an available residual pressure of 45-psi. Based on this residual pressure, the fire flow water demand requirements for the project are within conformance of the City's and Fire District's standards. A hydrant fire flow test has not yet been completed by the City, but it is anticipated adequate water pressure would be available for fire purposes.

Recycled Water

The project would tie into the City's recycled water system to serve irrigation demands. There is an existing 12-inch recycled water main in Dowdell Avenue adjacent to the project site.

Wastewater

To serve wastewater demands, the proposed project would tie into the City's existing sanitary sewer system. There is an existing 6-inch sewer line stubbed to the project site from the south. The existing line is located at the southern property line adjacent to Dowdell Avenue.

Stormwater

In addition to flood control, the City has adopted the City of Santa Rosa and County of Sonoma Storm Water Low Impact Design (LID) Technical Design Manual (LID Manual) to address stormwater runoff quality and quantity from new development and redevelopment or infill projects. To meet the design goal, the project would include bioretention areas sized in accordance with LID requirements to achieve the 100% volume capture goal to ensure post project conditions would be the same as pre-project conditions.

Sustainability Features

The proposed project would include the following sustainability features:

- Compliance with current Title 24, Part 6, of the California Code of Regulations energy efficiency standards at the time of building construction.
- Compliance with current Title 24, Part 11, of the California State Building Code "Green Building Standards Code" in effect at the time of construction.
- During both construction and operation of the project, the project would comply with all state regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended. During construction, all waste generated would be recycled to the maximum extent possible.

Project Entitlements and Required Approvals

The proposed project would require the following City approvals:

- Site Plan and Architectural Review
- Conditional Use Permit

3.1 Aesthetics

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

a) Would the project have a substantial adverse effect on a scenic vista?

Scenic vistas are defined as an expansive view of highly valued landscape features (e.g., mountain range, lake, or coastline) observable from a publicly accessible vantage point. In the project vicinity, publically accessible vantage points are limited to public roads (Business Park Drive and Dowdell Avenue). As described in Chapter 3, Community Design of the City of Rohnert Park General Plan, Highway 101 has been designated as a scenic corridor by Sonoma County (City of Rohnert Park 2017). While the project site is in close proximity to Highway 101, the site is not visible from the highway due to existing development and mature trees to the east of the project site.

The project would be constructed in an existing industrial, regional commercial, and high-density residential area. There are no scenic resources or unique natural features at or adjacent to the site. The site is graded and has been previously disturbed. Due to the relatively flat topography and the existing built environment,

no scenic vistas occur in the project area. Therefore, the project would have **no impact** on scenic vistas nor result in damage to scenic resources.

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

The project site is comprised of vacant and previously graded land and does not contain any buildings. The site does not include any scenic resources except for a row of sycamore trees along the northern site boundary adjacent to Business Park Drive as well as a row of coast redwood trees, which occur along the western property boundary. These trees would remain based on the current project description. In addition, there are no state scenic highways near the project site, as identified by the California Scenic Highway Mapping System (Caltrans 2011). The project would not substantially damage any scenic resources; therefore, impacts of the project would be **less than significant**.

c) In non-urbanized areas, would the project 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?

The project site is located in the City of Rohnert Park and the area surrounding the project site is developed with a mix of uses and would be considered an urbanized area. For the purposes of this analysis, a substantial degradation of the existing visual character or quality of the site would occur if the project would conflict with the underlying zoning or any other City regulations that govern scenic quality. The project site is designated and zoned as "Industrial" on the City's Zoning Map and in the City's General Plan. Thus, the proposed use of the site with industrial buildings would be consistent with the underlying zoning and surrounding development. The project would not conflict with any of the City's goals and policies contained in the City's General Plan, Chapter 3, Community Design specific to ensuring future development maintains the City's scenic resources. While there would be a change in the visual character of the site, the project's impact related to visual character would be **less than significant.**

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

The proposed project would increase nighttime lighting from vehicles at the site, parking lot lights, and building lights. However, due to development in the surrounding area, a significant amount of ambient nighttime lighting currently exists and affects nighttime views in the area. In addition, the project would be required to comply with the City of Rohnert Park's lighting and glare standards (Municipal Code Section 17.12.050). This section requires all lighting, reflective surfaces, and other sources of illumination to be utilized in a manner that produces no glare on public streets or on any other parcel. Lighting shall be the minimum illumination necessary for a given application and shall be directed downward/shielded. The project would adhere to these conditions which would ensure that potential impacts remain **less than significant.**

Mitigation Measures

No mitigation measures are required.

3.2 Agriculture and Forestry Resources

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

a) Would the project 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?

The proposed project is located in an area of existing industrial, regional commercial, and high density residential uses. The project site has been previously disturbed and does not contain land that is designated as prime agricultural soils by the Natural Resources Conservation Service. The California Department of Conservation (DOC 2016) also has not identified the site as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is designated as "Farmland of Local

Importance" by the DOC. Farmland of Local Importance is defined as soils that would be classified as prime and statewide, but lack available irrigation water. Farmland of Local Importance is not considered agricultural lands based on Section 21060.1 of the Public Resources Code. Therefore, there would be **no impact** related to converting important farmland to non-agricultural use.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project site is designated and zoned "Industrial" according to the Rohnert Park General Plan (Rohnert Park 2019b). The site is not planned for or used for any agricultural or forestry purposes and the proposed project would not result in the conversion of any agricultural forestland, conflict with any agricultural use, or conflict with a Williamson Act contract. Therefore, there would be **no impact** related to conflict of zoning or a Williamson Act Contract.

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

The project site is designated as industrial in the City's General Plan and zoned I-L (Light Industrial) (Rohnert Park 2019a, Rohnert Park 2019b). A row of sycamore trees occurs along the northern site boundary adjacent to Business Park Drive and a row of coast redwood trees occur along the western property boundary. No portion of the project site is considered forest land[1] as defined in PRC Section 12220(g). Timberland[2] (as defined by PRC Section 4526) or timberland-zoned timberland production[3] (as defined by Section 51104(g) of the Government Code) is not present on site, nor are there any active or potential commercial timber operations present in the area. Therefore, the proposed project would not conflict with lands zoned for forest land, timberland, or timberland production and there would be **no impact**.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Refer to answer provided in 'c" above.

e) Would the project 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?

Refer to answers provided in 'a', 'b', and 'c' above.

Mitigation Measures

No mitigation measures are required.

---

1 "Forest land" is land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

2 "Timberland" means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.

3 "Timberland production zone" or "TPZ" means an area, which is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The Bay Area Air Quality Management District (BAAQMD) adopted updated CEQA Air Quality Guidelines, including new thresholds of significance in June 2010 (BAAQMD 2010), which were revised in May 2011. The CEQA Air Quality Guidelines advise lead agencies on how to evaluate potential air quality impacts, including establishing quantitative and qualitative thresholds of significance. The BAAQMD resolutions adopting and revising the significance thresholds in 2011 were set aside by a judicial writ of mandate on March 5, 2012. In May 2012, the BAAQMD updated its CEQA Air Quality Guidelines to continue to provide direction on recommended analysis methodologies, but without recommended quantitative significance thresholds (BAAQMD 2012). On August 13, 2013, the First District Court of Appeal ordered the trial court to reverse the judgment and upheld the BAAQMD's CEQA thresholds. The BAAQMD CEQA Air Quality Guidelines were recently re-released in May 2017 and include the same thresholds as in the 2010 and 2011 Guidelines for criteria air pollutants, toxic air contaminants (TACs), and greenhouse gases (GHGs) (BAAQMD 2017a). The Guidelines also address the December 2015 Supreme Court's opinion (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369). These BAAQMD significance thresholds are summarized in Table 3.3-1.

In general, the BAAQMD significance thresholds for reactive organic gases (ROG), oxides of nitrogen (NO_x), particulate matter with an aerodynamic resistance diameter of 10 micrometers or less (PM_{10}), particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less ($PM_{2.5}$), and carbon monoxide (CO) address the first three air quality significance criteria. The BAAQMD maintains that these thresholds are intended to maintain ambient air quality concentrations of these criteria air pollutants below state and federal standards and to prevent a cumulatively considerable contribution to regional nonattainment with ambient air quality standards. The TAC thresholds (cancer and noncancer risks) and local CO thresholds address the fourth significance criterion, and the BAAQMD odors threshold addresses the fifth significance criterion.

Table 3.3-1. Thresholds of Significance

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs/day)	*Average Daily Emissions (lbs/day)*	*Maximum Annual Emissions (tons/year)*
ROG	54	54	10
NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
$PM_{10}/PM_{2.5}$ (fugitive dust)	Best Management Practices	None	
Local CO	None	9.0 ppm (8-hour average, 20.0 ppm (1-hour average)	
Risks and Hazards (Individual Project)	Compliance with Qualified Community Risk Reduction Plan or Increased cancer risk of >10.0 in a million Increased noncancer risk of >1.0 Hazard Index (Chronic or Acute) Ambient $PM_{2.5}$ increase >0.3 µg/m^3 annual average Zone of Influence: 1,000-foot radius from property line of source or receptor		
Risks and Hazards (Cumulative)	Compliance with Qualified Community Risk Reduction Plan or Cancer risk of >100 in a million (from all local sources) Noncancer risk of >10.0 Hazard Index (chronic, from all local sources) Ambient $PM_{2.5}$ >0.8 µg/m^3 annual average (from all local sources) Zone of Influence: 1,000-foot radius from property line of source or receptor		
Accidental Release of Acutely Hazardous Air Pollutants	None	Storage or use of acutely hazardous material located near receptors or new receptors located near stored or used acutely hazardous materials considered significant	
Odors	None	Five confirmed complaints to BAAQMD per year averaged over 3 years	

Source: BAAQMD 2017a

lbs/day = pounds per day; tons/year = tons per year; ppm = parts per million; µg/m^3 = micrograms per cubic meter; ROG = reactive organic gases; NO_x = oxides of nitrogen; PM_{10} = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; CO = carbon monoxide

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

An area is designated as "in attainment" when it is in compliance with the federal and/or state standards. These standards are set by the U.S. Environmental Protection Agency (EPA) or California Air Resources Board (CARB) for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or public welfare with a margin of safety. The project site is located within the San Francisco Bay Area Air Basin (SFBAAB), which is designated non-attainment for the federal 8-hour ozone (O_3) and 24-hour $PM_{2.5}$ standards. The area is in attainment or unclassified for all other federal standards. The area is designated non-attainment for state standards for 1-hour and 8-hour O_3, 24-hour PM_{10}, annual PM_{10}, and annual $PM_{2.5}$.

On April 19, 2017, the BAAQMD adopted the *Spare the Air: Cool the Climate Final 2017 Clean Air Plan* (BAAQMD 2017b). The 2017 Clean Air Plan provides a regional strategy to protect public health and protect the climate. To protect public health, the 2017 Clean Air Plan includes all feasible measures to reduce emissions of O_3 precursors (ROG and NO_x) and reduce O_3 transport to neighboring air basins. In addition, the 2017 Clean Air Plan builds upon the BAAQMD efforts to reduce fine particulate matter (PM) and toxic

air contaminants (TACs). To protect the climate, the 2017 Clean Air Plan defines a vision for transitioning the region to a post-carbon economy needed to achieve ambitious GHG reduction targets for 2030 and 2050, and provides a regional climate protection strategy that will put the Bay Area on a pathway to achieve those GHG reduction targets.

The BAAQMD Guidelines identify a three-step methodology for determining a project's consistency with the current Clean Air Plan. If the responses to these three questions can be concluded in the affirmative and those conclusions are supported by substantial evidence, then the BAAQMD considers the project to be consistent with air quality plans prepared for the Bay Area.

The first question to be assessed in this methodology is "does the project support the goals of the Air Quality Plan"? The BAAQMD-recommended measure for determining project support for these goals is consistency with BAAQMD thresholds of significance. If a project would not result in significant and unavoidable air quality impacts, after the application of all feasible mitigation measures, the project would be consistent with the goals of the 2017 Clean Air Plan. As indicated in the following discussion with regard to air quality impact questions b) and c), the project would result in less than significant construction and operational emissions. Therefore, the project would be considered to support the primary goals of the 2017 Clean Air Plan and is consistent with the current Clean Air Plan.

The second question to be assessed in this consistency methodology is "does the project include applicable control measures from the Clean Air Plan?" The 2017 Clean Air Plan contains 85 control measures aimed at reducing air pollution in the Bay Area. Projects that incorporate all feasible air quality plan control measures are considered consistent with the Clean Air Plan. The project includes plans for approximately 180,000 square-feet of light industrial uses and associated above ground parking. The control strategies of the 2017 Clean Air Plan include measures in the categories of stationary sources, the transportation sector, the buildings sector, the energy sector, the agriculture sector, natural and working lands, the waste sector, the water sector, and super-GHG pollutant measures. Depending on the control measure, the tools for implementation include leveraging the BAAQMD rules and permitting authority, regional coordination and funding, working with local governments to facilitate best policies in building codes, outreach and education, and advocacy strategies. Since the proposed project would comply with all applicable BAAQMD rules and would incorporate energy efficiency and green building measures in compliance with state standards and/or local building codes, the project would include applicable control measures from the 2017 Clean Air Plan.

The third question to be assessed in this consistency methodology is "does the project disrupt or hinder implementation of any control measures from the Clean Air Plan?" Examples of how a project may cause the disruption or delay of control measures include a project that precludes an extension of a transit line or bike path, or proposes excessive parking beyond parking requirements. The proposed project would not create any barriers or impediments to planned or future improvements to transit or bicycle facilities in the area, nor would it include excessive parking. Therefore, the proposed project would not hinder implementation of 2017 Clean Air Plan control measures.

In summary, the responses to all three of the questions with regard to Clean Air Plan consistency are affirmative and the proposed project would not conflict with or obstruct implementation of the 2017 Clean Air Plan. This is a **less-than-significant impact**.

b) Would the project 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?

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions from construction and operation of the proposed project (see Appendix A for the model outputs). CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant and GHG emissions associated with the construction and operational activities from a variety of land use projects, such as residential, commercial, and industrial facilities. CalEEMod input parameters, including the proposed project land use type and size and construction schedule were based on information provided by the project applicant, or default model assumptions if project specifics were unavailable.

Construction. Construction of the proposed project would involve construction of approximately 180,000 square-feet of industrial uses and associated above ground parking. For the purposes of quantifying air emissions, construction is anticipated to begin in May 2020 and would take approximately 7.5 months to complete. Construction would involve site preparation and grading of the site. During grading, approximately 21,000 cubic yards of soil would be exported. Sources of emissions would include: off-road construction equipment exhaust, on-road vehicles exhaust and entrained road dust (i.e., material delivery trucks and worker vehicles), fugitive dust associated with site preparation and grading activities, and paving and architectural coating activities. Detailed assumptions associated with project construction are included in Appendix A.

Average daily emissions were computed by dividing the total construction emissions by the number of active construction days, which were then compared to the BAAQMD construction thresholds of significance. Table 3.3-2 shows average daily construction emissions of O_3 precursors (ROG and NO_x), PM_{10} exhaust, and $PM_{2.5}$ exhaust during project construction.[4]

Table 3.3-2. Average Daily Unmitigated Construction Emissions

Year	ROG	NO_x	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
	pounds per day			
2020	11.1	22.5	3.8	2.6
BAAQMD Construction Thresholds	*54*	*54*	*82*	*54*
Exceed Threshold?	**No**	**No**	**No**	**No**

Source: Appendix A
Note: The values shown are average daily emissions based on total overall tons of construction emissions, converted to pounds, and divided by 166 active work days.
ROG = reactive organic gases; NOx = oxides of nitrogen; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

As shown in Table 3.3-2, construction of the proposed project would not exceed BAAQMD significance thresholds. Criteria air pollutant emissions during construction would be less than significant. Although the BAAQMD does not have a quantitative significance threshold for fugitive dust, the BAAQMD's CEQA Guidelines recommend that projects determine the significance for fugitive dust through application of best management practices (BMPs). The project contractor would be required as either standard conditions of

[4] Fuel combustion during construction and operation would also result in the generation of sulfur dioxide (SO_2) and CO. These values are included in Appendix A. However, since the SFBAAB is in attainment of these pollutants, the BAAQMD has not established a quantitative mass-significance threshold for comparison and are not included in the project-generated emissions tables in this document. Notably, the BAAQMD does have screening criteria for operational localized CO.

approval or included as part of the tentative map requirements to implement the following BMPs that are required of all projects:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. 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.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Implementation of the required fugitive dust control measures would ensure air quality and fugitive dust-related impacts associated with construction would remain **less than significant**.

Operation. Operation of the project would generate criteria pollutant (including ROG, NO_x, PM_{10}, and $PM_{2.5}$) emissions from mobile sources (vehicular traffic), area sources (consumer products, architectural coatings, landscaping equipment), and energy sources (natural gas appliances, space and water heating). CalEEMod was used to estimate daily emissions from project-related operational sources. The CalEEMod default trip generation rate was adjusted to match the project-specific information presented in the traffic analysis. Table 3.3-3 summarizes the daily mobile, energy, and area emissions of criteria pollutants that would be generated by project development and compares the emissions to BAAQMD operational thresholds.

Table 3.3-3. Daily Unmitigated Operational Emissions

Source	ROG	NO_x	PM_{10}	$PM_{2.5}$
	pounds per day			
Area	4.3	<0.1	<0.1	<0.1
Energy	0.1	1.3	0.1	0.1
Mobile	1.8	8.7	5.0	1.4
Total	**6.2**	**10.0**	**5.1**	**1.5**
BAAQMD Operational Thresholds	*54*	*54*	*82*	*54*
Exceed Threshold?	**No**	**No**	**No**	**No**

Source: Appendix A.

Note: The values shown are the maximum summer or winter daily emissions results from CalEEMod. Values of "<0.1" indicate that the estimated emissions are less than one decimals.
ROG = reactive organic gases; NOx = oxides of nitrogen; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

As indicated in Table 3.3-3, project-related operational emissions of ROG, NO_x, PM_{10}, and $PM_{2.5}$ would not exceed the BAAQMD significance thresholds during operations, and thus, the proposed project would have a **less than significant** impact in relation to regional operational emissions.

In regards to localized CO concentrations, according to the BAAQMD thresholds, a project would result in a less than significant impact if the following screening criteria are met:

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

The proposed project would generate minimal new traffic trips and would comply with the BAAQMD screening criteria. Accordingly, project-related traffic would not exceed CO standards and therefore, no further analysis was conducted for CO impacts. This CO emissions impact would be considered **less than significant** on a project-level and cumulative basis.

Past, present, and future development projects may contribute to the region's adverse air quality impacts on a cumulative basis. Per BAAQMD's CEQA Guidelines, by its 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. In developing thresholds of significance for air pollutants, 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 considered cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, if the proposed project's emissions are below the BAAQMD thresholds or screening criteria, then the proposed project's cumulative impact would be considered to be less than significant.

As described in criterion "b" above, criteria pollutant emissions generated by short-term construction and long-term operations of the project would not exceed the BAAQMD significance thresholds. Thus, the project would have a **less than significant** cumulative impact in relation to regional emissions. In addition, project-related traffic would not exceed the BAAQMD CO screening criteria and would result in a **less than significant cumulative impact** in relation to localized CO.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

The BAAQMD has adopted project and cumulative thresholds for three risk-related air quality indicators for sensitive receptors: cancer risks, noncancer health effects, and increases in ambient air concentrations of $PM_{2.5}$. These impacts are addressed on a localized rather than regional basis and are specific to the sensitive receptors identified for the project. Sensitive receptors are groups of individuals, including children, the elderly, the acutely ill, and the chronically ill, that may be more susceptible to health risks due

to chemical exposure, and sensitive-receptor population groups are likely to be located at hospitals, medical clinics, schools, playgrounds, childcare centers, residences, and retirement homes (BAAQMD 2017a). The closest existing sensitive receptors are existing multi-family apartments located adjacent to the project site to the south.

Toxic Air Contaminants

"Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period would contract cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. TACs that would potentially be emitted during construction activities would be diesel particulate matter, emitted from heavy-duty construction equipment and heavy-duty trucks. Heavy-duty construction equipment and diesel trucks are subject to CARB air toxic control measures to reduce diesel particulate matter emissions. According to the OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, the duration of proposed construction activities (approximately 7-months) would only constitute a small percentage of the total 30-year exposure period.

Regarding long-term operations, the site plan for the project locates the loading docks of the building nearest along the eastern side of Building 1 and western side of Building 2. This design would provide a distance buffer between any diesel trucks loading/unloading at the facility and proximate residences. Additionally, the proposed project would not result in non-permitted stationary sources that would emit air pollutants or TACs. Operation of the proposed project would generate criteria air pollutant emissions; however, the proposed project would not exceed the BAAQMD mass-emission thresholds, as shown in Tables 3.3-2 and 3.3-3.

Health Impacts of Criteria Air Pollutants

Volatile Organic Compounds (VOCs) (also referred to as ROG) would be associated with motor vehicles, construction equipment, and architectural coatings; however, project-generated VOC emissions would not result in the exceedances of the BAAQMD thresholds. Generally, the VOCs in architectural coatings are of relatively low toxicity. Additionally, BAAQMD Regulation 8, Rule 3 restricts the VOC content of coatings for both construction and operational applications. ROG and NOx are precursors to O_3, for which the SFBAAB is designated as nonattainment with respect to the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) and. The health effects associated with O_3 are generally associated with reduced lung function. The contribution of ROG and NOx to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SFBAAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the ROG emissions would occur because exceedances of the O_3 NAAQS and CAAQS tend to occur between May and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to assess this impact. Nonetheless, because ROG and NO_x emissions associated with construction and/or operation would not exceed the BAAQMD significance thresholds (as depicted in Tables 3.3-2 and 3.3-3), it is not anticipated that the proposed project would contribute substantially to regional O_3 concentrations and the associated health effects. Impacts are considered less than significant and no mitigation is required.

As shown in Tables 3.3-2 and 3.3-3, construction and operation of the proposed project would not exceed thresholds for PM_{10} or $PM_{2.5}$ and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter or would obstruct the SFBAAB from coming into attainment for these pollutants. Additionally, the proposed project would implement dust control strategies and be required to implement the BAAQMD BMPs, which limits the amount of fugitive dust generated during construction. Due to the minimal contribution of particulate matter during construction and operation, health impacts would be considered less than significant and no mitigation is required.

Construction and operation of the proposed project would not contribute to exceedances of the NAAQS and CAAQS for NO_2. Health impacts that result from NO_2 include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, proposed project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the project site at any one time. In addition, existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards. Construction of the proposed project would result in a minimal increase in localized NO_2 emissions and would not contribute to exceedances of the NAAQS and CAAQS for NO_2. Therefore, the proposed project is not anticipated to result in substantial NO_2 emissions or the potential health effects associated with NO_2. Impacts are considered less than significant and no mitigation is required.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, thereby reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. CO hotspots were discussed previously as a less-than-significant impact. Thus, the proposed project's CO emissions would not contribute to the health effects associated with this pollutant. In summary, health impacts of criteria air pollutants would be less than significant, and no mitigation is required.

In summary, the proposed project would not expose sensitive receptors to substantial, long-term pollutant concentrations or health risk during construction or operations, and this impact would be **less than significant** on a project-level and cumulative basis.

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

BAAQMD has identified typical sources of odor in the CEQA Air Quality Guidelines, a few examples of which include manufacturing plants, rendering plants, coffee roasters, wastewater treatment plants, sanitary landfills, and solid waste transfer stations. While sources that generate objectionable odors must comply with air quality regulations, the public's sensitivity to locally produced odors often exceeds regulatory thresholds. The project would not include uses that have been identified by BAAQMD as potential sources of objectionable odors. Potential odor impacts would be **less than significant**.

Mitigation Measures

No mitigation measures are necessary.

3.4 Biological Resources

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

A Biological Assessment (BA) of the project site was conducted in 2017 by Wiemeyer Ecological Sciences and is included in Appendix B. The purpose of the BA was to describe existing, onsite biological resources and identify potentially significant impacts than could occur from future development on the 10.3-acre project site. The BA includes a literature search and results of field surveys.

The project site is located within the Santa Rosa Plain Conservation Strategy study area, which has distinct protocols for the survey and reporting for California tiger salamander (*Ambystoma californiense*) and several special-status plant species, as well as mitigation requirements for different zones within the study area. Non-native annual grasslands and seasonal wetlands on site provide potential habitat for several special- status plant species.

Habitat types at the site consist of non-native annual grassland habitat and seasonal wetland habitat. A row of sycamore (*Platanus racemosa*) trees occur along the northern site boundary adjacent to Business Park Drive and a row of coast redwood (*Sequoia sempervirens*) trees occur along the western property boundary. The project site is mostly flat with a slight slope to the northwest. Elevations range from 89 to 97 feet above sea level. The site has been annually disked and mowed for several years as part of agricultural practices. The site consists of one soil type: Clear Lake clay, sandy substratum, drained 0% to 2% slopes (CeA) (NRCS 2017).

The project site can be classified as disturbed and developed. The vegetation within this land cover type is typical of non-native grass and forb species found in previously graded lots.

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

Special-status biological resources present or potentially present on the project site were identified through a search of the California Department of Fish and Wildlife (CFDW) California Natural Diversity Database (CNDDB), the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) database, and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California. These databases were queried for a list of all plant and animal species reported from the Cotati, Santa Rosa, Kenwood, Glen Ellen, Petaluma River, Point Reyes NE, Two Rock, Sebastopol U.S. Geologic Survey 7.5–minute quadrangles (nine quad search).

For this analysis, special-status species are those that are (1) listed, proposed for listing, or candidates for listing under the federal Endangered Species Act as threatened or endangered; (2) listed or candidates for listing under the California Endangered Species Act as threatened or endangered; (3) a state fully protected species; (4) a CDFW Species of Special Concern; or (5) a species listed on the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California. This includes plants designated with a California Rare Plant Rank of 1B or 2B. Special-status vegetation communities are those communities identified as high priority for inventory in the List of Vegetation Alliances and Associations (CDFG 2010) with a state rarity ranking of S1, S2, or S3.

On April 5, April 9, and May 24, 2017, Wiemeyer and Associates conducted field visits to assess habitat suitability for special-status plant and animal species that have the potential to use the site for foraging or nesting. This analysis assumed that the entire project site would be permanently impacted by development.

Seasonal Wetlands

A wetland delineation was performed at the site in 2013 by North Fork Associates. A total of 0.005 acre of seasonal wetlands were delineated at the southern site boundary. The United States Army Corps of Engineers (USACE) confirmed the extent of the seasonal wetlands at the site. Dominant plant species in the seasonal wetland include Italian ryegrass (*Lolium multiflorum*), Harding grass (*Phalaris aquatica)*,

Mediterranean barley (*Hordeum marinum*), and bristly oxtongue (*Helminthotheca echioides*). This wetland has been degraded as a result of past agricultural uses and surrounding development.

Special-Status Plants

The CNDDB includes an occurrence of Sebastopol meadowfoam on the project site dating from 2012. However, no special-status plants were observed during protocol-level surveys conducted in 2017, which were conducted during months when potentially occurring special-status plants would be detectable. Past agricultural land uses have greatly diminished the likelihood that special-status plant species would be present on the site. Non-native annual grassland is the dominant plant community on the site, which is a result of human disturbance, primarily from years of livestock grazing and agricultural practices. However, the seasonal wetland may be suitable habitat for three federally endangered plant species covered by the Santa Rosa Plain Conservation Strategy: Burke's goldfields (*Lasthenia burkei*), Sonoma sunshine (*Blennosperma bakeri*), and Sebastopol meadowfoam (*Limnanthes vinculans*).

Other special-status plants with potential to occur in both the seasonal wetlands and non-native annual grasslands are pappose tarplant (*Centromadia parryi* ssp. *parryi*), dwarf downingia (*Downingia pusilla*), legenere (*Legenere limosa*), Baker's navarretia (*Navarretia leucocephala* ssp. *bakeri*), and saline clover (*Trifolium hydrophilum*).

Wildlife

The site provides limited habitat value for wildlife species, primarily because of the history of agricultural use; however potential habitat for various special-status wildlife species remains on the site, as discussed below.

Birds and Bats

No active bird nests were observed during the three site visits in 2017, but the site does provide suitable nesting habitat for ground-nesting birds and suitable foraging habitat for several bird and bat species. The sycamore trees along Business Park Drive and the coast redwoods both provide suitable habitat for migratory birds and bat roosting habitat. Future construction of the industrial park at the project site could result in impacts to nesting birds, including the direct loss of nests, eggs, and fledglings if vegetation is cleared and ground disturbing activities occur during nesting season. The Federal Migratory Bird Treaty Act and California Fish and Game Code 3503.5 protect all raptor and native migratory birds in California.

California Tiger Salamander (CTS)

The Sonoma population of the CTS is a federally and State threatened amphibian species. This species uses vernal pools, ephemeral pools, and sometimes stream courses and man-made pools if predatory fish are absent, for breeding. CTS use annual grassland and valley and foothill hardwood forest for aestivation and overland dispersal habitat.

The project site is located within CTS critical habitat and is located within the study area of the Santa Rosa Plain Conservation Strategy. The project site is mapped in the Conservation Strategy as "Future Development", but the Biological Opinion issued for the implementation of the Conservation Strategy mapped the project site as an area where development "May adversely affect listed plants and would likely adversely affect CTS". The seasonal wetlands on-site do not provide suitable breeding habitat for CTS due to the shallow depth of features and the short inundation period. To confirm the closest known location of

CTS, a search of the CNDDB for this IS/MND identified the two nearest occurrences of CTS are approximately 3,000 feet to the north of the site and date from 2002. The proposed project would result in a loss of approximately 10.3 acres of suitable upland habitat for CTS.

Development of the project site would have a direct or indirect impact to protected species and/or their habitat. Therefore, impacts would be considered potentially significant. Compliance with mitigation measures BIO--2, BIO-3, and BIO-4 identified below would ensure impacts would be reduced to **less-than-significant with mitigation.**

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

There are no riparian areas or sensitive natural communities located within the project site. Therefore, the proposed project would have **no impact** to these resources. .

c) Would the project 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?

A total of 0.005-acre of seasonal wetland habitat occurs along the southern boundary of the site, as discussed above. The seasonal wetland has been degraded and lacks the native vernal pool species that typically occur in high quality seasonal wetlands, presumably due to prior agricultural activities on the site. Nevertheless, seasonal wetlands are considered suitable habitat for three federally endangered plant species known to occur in the Santa Rosa Plain. The project is proposing to fill this seasonal wetland which would be considered a significant impact. Compliance with Mitigation Measure BIO-1 would ensure the impact would be reduced to **less–than-significant with mitigation**.

d) Would the project 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?

Wildlife corridors are linear and/or regional habitats that provide connectivity to other natural vegetation communities within a landscape fractured by urbanization and other development. There is existing development on three sides of the project site, which would not allow for easy travel, migration, or breeding within the site. The project site does not function as a wildlife corridor and does not support any wildlife nursery sites. Thus, there would be **no impact** to wildlife corridors or wildlife nursery sites.

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

The City's General Plan Policy EC-9 states: "As part of the City's Capital Improvement Program (see Policy GM-15 in the Chapter 2: Land Use and Growth Management), incorporate a tree planting program for new and existing streets and maintenance of existing trees." In accordance with the City's Chapter 17.15 – Tree Preservation and Protection Ordinance 17.15.030 (Requirements), "No person shall alter, remove, or relocate any tree on private property that is not exempted by this chapter, unless the community

development director or his/her designee has issued a tree removal permit in accordance with Section 17.15.040" (Permit processing).

Exemptions for a tree permit are presented in Section 17.15.030 (B)(2), which states that the following trees shall be exempt from the requirements of the chapter: "Any proposed tree alteration, removal, or relocation which is part of a larger project. In such cases, the alteration, removal, or relocation shall be processed along with the primary entitlement request which was submitted for the project." Section 17.15.030 (B)(5) states that the following trees are exempt from the tree permit requirements: "Acacia spp. (Acacia), Ailanthus spp. (Tree of Heaven), Eucalyptus spp., Ligustrum spp. (Privet), Liquidambar styraciflua (Liquidambar), Pinus radiata (Monterey Pine), or Populus nigra italic (Lombardy poplar)."

The site is mainly devoid of trees, but a row of sycamore trees occur along the northern site boundary adjacent to Business Park Drive and a row of coast redwood trees are adjacent to the western property boundary. The applicant is proposing to preserve these trees and incorporate them into the project's landscaping plan. The project would not conflict with any city policies or ordinances protecting biological resources; therefore there would be **no impact**.

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

As previously discussed, the project site is located within the area covered by the Santa Rosa Plain Conservation Strategy. The purpose of the conservation strategy is to create a long-term conservation program to assist in the recovery of CTS and special-status plant species. The project would comply with Mitigation Measure BIO-3 to ensure that potential conflicts with the Santa Rosa Plain Conservation Strategy remains **less than significant**.

Mitigation Measures

Mitigation Measures BIO-1 through BIO-4 include all preconstruction survey requirements, as well as protocols to follow in the event special-status species or potential special-status species habitat are identified. Compliance with these mitigation measures ensures potential impacts to protected species or their habitat would be reduced to less than significant.

Mitigation Measure BIO-1 *Wetland Permits*: The project applicant shall obtain permit authorization from the U.S. Army Corps of Engineers under the 404 Nationwide Permit Program and the State Water Resources Control Board under the 401 Water Quality Certification Program for the loss of 0.005 acre of seasonal wetland habitat and shall replace 0.0005 acre of wetland habitat at a 1:1 ratio at an approved wetland mitigation bank.

Mitigation Measure BIO-2: *Preconstruction Nesting Bird Surveys.* If construction is proposed during the breeding season (February 1 through August 30), a preconstruction nesting bird survey shall be conducted at the project site (plus a 250-foot buffer for raptors) by a qualified biologist 14 days prior to the beginning of construction activities. If no active nests are found during the preconstruction survey, no further mitigation is required.

If any active nests are found within 250-feet of the project alignment, a temporary buffer shall be determined and flagged by the qualified biologist based on the location of the nest and planned

construction activity in the vicinity of the nest. These nests shall be avoided until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.

Mitigation Measure BIO-3: *Preconstruction Survey for Burrowing Owl and Upland Habitat Assessment for California Tiger Salamander*

Burrowing Owl

A qualified biologist shall conduct take avoidance surveys for burrowing owl within 14 days prior to ground-disturbing activities at the project site, consistent with Appendix D of the Staff Report on Burrowing Owl Mitigation (CDFW 2012). The survey shall cover the limits of ground disturbance and potentially suitable nesting habitat within 300 feet, to the extent feasible. If ground-disturbing activities are delayed by more than 7 days, then an additional survey shall be conducted within 24 hours prior to ground disturbance. If no potential burrowing owl nests are detected during the take avoidance surveys, no additional actions are needed, and ground-disturbing activities may proceed.

If non-nesting burrowing owls are observed in or adjacent to the construction footprint during the survey, construction shall be postponed until the qualified biologist can fully implement a California Department of Fish and Wildlife-approved burrow exclusion plan (to be prepared by the qualified biologist). The exclusion plan shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW 2012). Once owls have been successfully excluded and unoccupied burrows evacuated, construction in the area may proceed.

If nesting burrowing owls are observed during the survey, construction activities within 300 feet of occupied burrows shall be delayed until young owls have fledged and are independent of the burrow, as determined by a qualified biologist. The qualified biologist may reduce the 300-foot buffer based on the type, timing, extent, and intensity of the construction activity and other factors such as site topography and vegetation cover between the construction activity and the burrow. Once all young have fledged and are no longer dependent upon the nest burrow, the same burrow exclusion procedure described above shall be implemented prior to resuming construction activities in the area.

California Tiger Salamander

A qualified biologist shall conduct a California Tiger Salamander habitat assessment within the project site to verify the absence of suitable small mammal burrows, large cracks, or other suitable refugia within the project site, This survey can occur in conjunction with the burrowing owl preconstruction survey. In the event that suitable habitat is found onsite, the project applicant shall either conduct protocol-level surveys for CTS to demonstrate absence or obtain take authorization from CDFW, with associated compensatory mitigation.

Mitigation Measure BIO-4: ***Preconstruction Roosting Bat Habitat Assessment.*** At least 14 days prior to the commencement of any construction activities, a qualified biologist shall conduct a habitat assessment for bats within the project area. The habitat assessment shall include a visual inspection of potential roosting features and presence of guano. Potential roosting features found during the survey shall be flagged or marked. If bats are detected and cannot be completely avoided with an avoidance buffer of 50 feet or greater, a bat mitigation and monitoring plan shall

be developed in coordination with the California Department of Fish and Wildlife. If no roosting habitat is identified during the survey, no further measures shall be necessary.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

A Cultural Resource Assessment for the Dowdell Industrial Park was conducted by Peak & Associates, Inc. on February 12, 2019. An additional records search was conducted for the project at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) on January 29, 2019. The report searched in a 0.125-mile radius of the project area. On October 4, 2019, Dudek expanded on this initial search and conducted a second records search with a half-mile radius around the project area.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Historical resource is a term with a defined statutory meaning (see Public Resources Code § 21084.1 and CEQA Guidelines § 15064.5(a), (b)). The term embraces any resources listed or determined to be eligible for listing in the National Register of Historic Places (NRHP), as well as some California State Landmarks and Points of Historical Interest. In addition, historical resources are evaluated against the California Register of Historical Resources (CRHR) criteria prior to making a finding as to the project's impacts on historical resources.

The project site consists of vacant graded land that was used for agricultural in the past. Currently, there are no built-features or structures on the site with the exception of trees along the northern and western site boundary. According to the results of the records search conducted in January 2019, there are no resources recorded within the project site. Dudek conducted another records search in October 2019 that included a 0.5-mile radius around the project site. Based on the results of this follow up records search. Due to the inclusion of sensitive information the results of these survey are consider confidential and not available for public review.

An intensive pedestrian level field survey of the project site was also conducted by Peak & Associates on February 11, 2019. Based on the field survey, no prehistoric period sites, historic period sites or historic landscapes were identified on the project site. However, during site disturbance there is the potential to

unearth unknown prehistoric or historic-era resources; therefore, with implementation of mitigation measure CUL-1 impacts to unknown historic resources would be **less-than-significant with mitigation**.

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

There are no known archeological resources onsite. However, during site disturbance and utility trenching there is always the potential to unearth subsurface archaeological resources. With implementation of Mitigation Measure CUL-1 impacts to cultural resources would be reduced to **less-than-significant with mitigation**.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

During site disturbance and trenching for utilities there is always the chance of unearthing human remains. All construction would be required to comply with Health & Safety code 7050.5 (HSC, 1987) that sets forth the protocol to follow in the event of discovery or recognition of human remains, which includes stopping work until the county coroner can make a determination that the remains are not subject to the provisions of Section 27491 of the California Government Code which requires an investigation of all unnatural deaths or death. Or any other related provisions of the law related to circumstances, manner and cause of death.

If the coroner has reason to believe that the remains are those of a Native American, he or she shall contact within 24 hours, the Native American Heritage Commission. Compliance with the Health and Safety Code as well as mitigation measure CUL-2 would ensure impacts would be reduced to **less than significant.**

Mitigation Measures

Compliance with the following mitigation measures would ensure the proper procedures are followed in the event any resources are uncovered during any site disturbing activities. Impacts would be reduced to less than significant with the following measures.

Mitigation Measure CUL-1: The City shall require that prior to the initiation of ground-disturbing work, construction crews shall be made aware of the potential to encounter cultural resources and Tribal Cultural Resources (including the traditional importance of resources such as cultural landscapes, significant waterways, and ethnobotanical plants) through a presentation provided by an archeologist and a representative from the Federated Indians of Graton Rancheria (Tribe). In the event that archaeological resources (sites, features, or artifacts) or Tribal Cultural Resources (as defined by the Tribe and CEQA) are exposed during construction activities, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, that meets the Secretary of the Interior Professional Qualifications for Archaeology, can evaluate the significance of the find in consultation with the Tribe to determine whether or not additional study is warranted. Should it be determined by the archeologist in consultation with the Tribe, temporary flagging may be installed around this resource in order to avoid any disturbances from construction equipment. As approved by the City, this buffer may be adjusted by the archaeologist to a distance that maintains a protective perimeter around the unanticipated resource, while still allowing for construction to continue in the surrounding area.

Mitigation Measure CUL-2: If human remains are encountered, the City shall comply with all state laws. All project-related ground disturbance within 100 feet of the find shall be halted until the county coroner has

been notified. If the coroner determines that the remains are Native American, the coroner will notify the Native American Heritage Commission within 24 hours. The Native American Heritage Commission will identify the person or persons believed to be the most likely descendants from the deceased Native American. The most likely descendent may make recommendations regarding the means of treating or disposing of the remains with appropriate dignity. Project-related ground disturbance in the vicinity of the find shall not resume until all statutory requirements have been met and evidence of completion has been submitted to the City, in consultation with the Tribe.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

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

The project plans to comply with the most current Title 24 California Building Code/Code of Regulations (2016), CAL Green Code, California Green Building Standards Code (2016), and 2016 energy standards at the time of building construction, as amended by the State of California and City of Rohnert Park. The project includes the construction of two "cold shell" buildings and any future tenants would be responsible to comply with all Title 24 energy requirements. During construction activities there would be heavy equipment required to clear and grade the site and to construct the buildings which would use diesel and gasoline to power the equipment. Construction equipment operators would not result in the unnecessary or inefficient use of resources. In addition, during both construction and operation of the project, the project applicant or their contractor would comply with all state regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended. During construction, all waste generated would be recycled to the maximum extent possible.

The project does not include the wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, the impact would be **less than significant.**

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically (every

3 years) to incorporate and consider new energy efficiency technologies and methodologies. Title 24 also includes Part 11, CALGreen. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The proposed project would meet Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency. Furthermore, The City of Rohnert Park has a GHG reduction plan that focuses on municipal operations, and thus is not applicable to the proposed project. The City is working with other jurisdictions to implement the Sonoma County Community Climate Action Plan to serve all of Sonoma County; however, this plan has not yet been adopted. In addition, the City's 2040 General Plan will address climate change to be compliant with State policies and address private development; however, the plan is not yet adopted.

Overall, the project would not conflict with existing energy standards and regulations; therefore, impacts during construction and operation of the proposed project would be **less than significant**.

Mitigation Measures

No mitigation measures would be required.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Gularte & Associates, Inc. (2017) prepared a Geotechnical report for the Dowdell Industrial Park included as Appendix C. To conduct the report, they reviewed site geology and groundwater conditions, analyzed liquefaction potential, and observed subsurface conditions. The site is located within the northern portion of the Coast Ranges Geomorphic Province at an elevation of around 95-102 ft. The site is relatively geologically young and seismically active region on the western margin of the North American Plate. The site is traversed by the active Rodgers Creek, Healdsburg, and Maacama fault zones, with the Rogers Creek and Maacama being the closest to the site. Quaternary alluvial and colluvial deposits underlie the project site. These soils typically consist of layers of silt and clay with isolated lenses of sand and gravel. The results and recommendations from the Geotechnical report are referenced to prepare the analysis.

a) Would the project 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.

The closest known active fault traces are those of the Rodgers Creek fault, approximately 3 miles northeast of the project site. In addition, the San Andreas Fault is located approximately 15 miles west of the city (City of Rohnert Park 2019a). The project site is located approximately 3 miles from any potentially active faults and from the nearest zoned fault (Rogers Creek Fault) and is not located within an Alquist-Priolo Fault Zone. Fault-line surface rupture would not be a hazard within the project site. Impacts related to fault rupture potential would be considered **less than significant**.

ii) Strong seismic ground shaking?

The extent of ground shaking is controlled by the magnitude and intensity of the earthquake, distance from the epicenter, and local geologic conditions. The closest active fault to the project site, the Hayward-Rogers Creek fault zone, is considered capable of generating a 6.8 earthquake. An earthquake of this magnitude would generate strong to violent seismic shaking at the project site. Such ground shaking is expected to result in significant structural damage. However, the

project would be required to have compliance with the state building code seismic requirements that would ensure ground-shaking remains less than significant.

iii) Seismic-related ground failure, including liquefaction?

Soil liquefaction most commonly occurs when ground shaking from an earthquake causes a sediment layer saturated with groundwater to lose strength and take on the characteristics of a fluid, thus becoming similar to quicksand. Liquefaction may also occur in the absence of a seismic event, when unconsolidated soil above hardpan become saturated with water. The majority of soils at the project site are characterized as fine grained and stiff, and these soils are not typically considered liquefiable. The overall probability of liquefaction remains low, making seismic-related ground failure a **less-than-significant impact**.

iv) Landslides?

The project vicinity and the project site is characterized as flat. The project site is not located within an area identified as being susceptible to landslides. This condition precludes the possibility of earthquake-induced landslides inundating the project site. Therefore, no impact would occur in association to landslides.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Erosion potential is low for almost all soils in the City of Rohnert Park, according to the Natural Resources Conservation Service (NRCS 2017). This low potential is primarily related to the high soil stability since the slopes in the city are generally less two percent. Instances of erosion are most likely to occur during construction, the removal of vegetation, and the effects of machinery. An acceptable degree of soil stability can be achieved by requiring incorporation of soil treatment programs (e.g., grouting, compaction, drainage control, lime treatment) in the excavation and construction phases of the project. Implementation of the recommended actions, grouting, compaction, drainage control, and lime treatment set forth in the Geotechnical Report (Appendix C) would ensure impacts related to erosion would remain **less than significant.**

c) Would the project 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?

Unstable geologic units or soils are characterized by materials lacking sufficient integrity to support urban development. The area surrounding the project site supports development, which indicates that geologic conditions in the area are capable of supporting the proposed development and would not be unstable. The onsite soils are considered suitable as fill material.

Based on the finding of the Geotechnical Report (see Appendix C), the site was observed to have medium brown low plasticity clays in the upper 10 feet, underlain by blue, high plasticity clays down at the bottom of the borings. During the tests, the report noted gas bubbling up and a Sulphur smell at roughly 30 feet down. The report recommended a lime treatment in all structural areas to mitigate damage to foundations and pavements.

The report also recommended further review of the gasses bubbling up on site. Further site review determined this gas to be methane from an unidentified source. This methane may be associated with geothermal activity or biogenic sources. This means that the concentration of this methane may vary due to geothermal conditions present on site. However, the laboratory analytical results of the soil gas samples did not indicate methane or other gases at concentrations in excess of applicable screening levels. Nevertheless, due to the uncertainties regarding the source of the methane and possible future changes in subsurface condition, the Geotechnical Report recommends industry standard methane mitigation measures and the following engineering solutions:

- Design and installation of a passive or active sub-slab venting/depressurization system beneath the entire footprint of each building,
- Installation of an engineered vapor barrier (e.g., GeoCore, Vapor Lock or LiquidBoot) beneath the office portions of each building, including construction QA/QC testing performed by a qualified contractor at the time the vapor barriers are installed,
- Installation of utility trench dams at various locations along utility corridors through the property and where utilities may enter the buildings through the slab, and
- Preparation of documentation, including O&M Plans, periodic inspection requirements, and maintenance and repair instructions.

Between the lime treatment and recommendations provided by the Report, the potential for soils to become unstable due to construction of the site, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse would remain **less than significant**.

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

Expansive soils shrink and swell as a result of moisture change. These volume changes can result in damage over time to building foundations, underground utilities, and other subsurface facilities if they are not designed and constructed appropriately to resist the damage associated with changing soil conditions. To evaluate the expansion potential of project site's native soil, Gularte & Associates performed an Expansion Index (EI) test. The test resulted in an EI of 103, indicating a high expansion potential. In order to minimize expansion potential, a lime treatment 12 to 18-inches deep is recommended in all structural areas to mitigate damages to foundations and pavements. As well, due to the expansion potential, footing lines should be kept neat to avoid "mushrooming" of building footings. Implementation of these recommendations as set forth in the Geotechnical Report would ensure that this impact would remain **less than significant.**

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

No septic tanks or alternative wastewater disposal systems are proposed; therefore, the project would have **no impact** related to septic tanks or alternative wastewater disposal systems.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The project site is located on relatively flat grassland, which has been graded and previously disturbed. There are no known paleontological resources onsite. The site is generally void of any unique features that would suggest unique geologic features. While there is always a chance to reveal unique geologic or paleontological resources during subsurface activities, the Cultural Assessment prepared by Peak & Associates determined that there are no known paleontological or geologic resources on the project site. However, to ensure that impacts to paleontological resources remain less than significant, should any such resources be encountered during project grading and construction, the project would be required to implement Mitigation Measure GEO-1. This mitigation measure is also included in the City of Rohnert Park General Plan EIR and impacts to paleontological resources would be considered a **less-than-significant impact with mitigation** to unique paleontological or geologic features.

Mitigation Measures

Compliance with the following mitigation measure would ensure the proper protocol is followed in the event any paleontological resources are unearthed during construction and impact would be reduced to less than significant.

Mitigation Measure GEO-1: Per state law, in the event that paleontological resources or unique geologic features are encountered during construction, all earthwork within a 50 meter (164 foot) radius of the find shall be stopped, the Sonoma County and the City of Rohnert Park notified, and a paleontologist retained.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind, lasting for an extended period (decades or longer). Gases that trap heat in the atmosphere are often called greenhouse gases or GHGs. The greenhouse effect traps heat in the troposphere through a threefold process: (1) short-wave radiation emitted by the Sun is absorbed by the Earth; (2) the Earth emits a portion of this energy in the form of long-wave radiation; and (3) GHGs in the upper atmosphere absorb this long-wave radiation and emit this long-wave radiation into space and back toward the Earth. This trapping of the long-wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect.

Principal GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide, O_3, and water vapor. Some GHGs, such as CO_2, CH_4, and nitrous oxide, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely byproducts of fossil-fuel combustion, whereas CH_4 results mostly from off-gassing associated with agricultural practices and landfills. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases, such as hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride, which are associated with certain industrial products and processes (CAT 2006).

The Intergovernmental Panel on Climate Change (IPCC) developed the Global Warming Potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons of CO_2 equivalent (MT CO_2e).

Regarding impacts from GHGs, both BAAQMD and the California Air Pollution Control Officers Association (CAPCOA) consider GHG impacts to be exclusively cumulative impacts (BAAQMD 2017a; CAPCOA 2008); therefore, assessment of significance is based on a determination of whether the GHG emissions from a project represent a cumulatively considerable contribution to the global atmosphere. This analysis uses both a quantitative and a qualitative approach. The quantitative approach is used to address the first significance criterion: "Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?" This analysis considers that, because the quantifiable thresholds developed by BAAQMD were formulated based on Assembly Bill (AB) 32 and California Climate Change Scoping Plan reduction targets for which its set of strategies were developed to reduce GHG emissions statewide, a project cannot exceed a numeric BAAQMD threshold without also conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, if a project exceeds a numeric threshold and results in a significant cumulative impact, it would also result in a significant cumulative impact with respect to plan, policy, or regulation consistency, even though the project may incorporate measures and have features that would reduce its contribution to cumulative GHG emissions.

Separate thresholds of significance are established by the BAAQMD for operational emissions from stationary sources (such as generators, furnaces, and boilers) and nonstationary sources (such as on-road vehicles) (BAAQMD 2017a). The threshold for stationary sources is 10,000 MT CO_2e per year (i.e., emissions above this level may be considered significant). For nonstationary sources, the following three separate thresholds have been established:

- Compliance with a Qualified Greenhouse Gas Reduction Strategy (i.e., if a project is found to be out of compliance with a Qualified Greenhouse Gas Reduction Strategy, its GHG emissions may be considered significant).
- 1,100 MT CO_2e per year (i.e., emissions above this level may be considered significant).
- 4.6 MT CO_2e per service population per year (i.e., emissions above this level may be considered significant). (Service population is the sum of residents plus employees expected for a development project.)

The quantitative threshold of 1,100 metric tons of CO_2e annually adopted by BAAQMD is applied to this analysis. If the project GHG emissions would exceed this threshold then, consistent with BAAQMD Guidelines, it would be considered to have a cumulatively considerable contribution of GHG emissions and a cumulatively significant impact on climate change.

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

Construction. Construction of the proposed project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor (material delivery) trucks, and worker vehicles. Since the BAAQMD has not established construction-phase GHG thresholds, construction GHG emissions were amortized assuming a 30-year development life after completion of construction and added to operational emissions to compare to the BAAQMD operational GHG threshold. Amortized GHG emissions associated with project construction would result in annualized generation of 16 MT CO_2e.

A detailed depiction of the construction schedule—including information regarding phasing, equipment utilized during each phase, vendor trucks, and worker vehicles—is included in Appendix A.

Operations. Long-term operational emissions would occur over the life of the project. CalEEMod was used to estimate GHG emissions from motor vehicle trips, grid electricity usage, solid waste, and other sources (including area sources, natural gas combustion, and water/wastewater conveyance).

CalEEMod default mobile source data, including temperature, trip characteristics, variable start information, emission factors, and trip distances, were used for the model inputs. Project-related traffic was assumed to be comprised of a mixture of vehicles in accordance with the model defaults for industrial land use traffic. The CalEEMod default trip rate was adjusted to match project-specifics in the traffic analysis. It is assumed that the first full year of project operation would be in the year 2021.

CalEEMod was also used to estimate emissions from the project's area sources, which includes operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions.

The estimation of operational energy emissions was based on CalEEMod land use defaults and total area (i.e., square footage) of the proposed project. Annual natural gas (non-hearth) and electricity emissions were estimated in CalEEMod using the emissions factors for PG&E as a conservative estimate and adjusted to account for 33 percent renewable portfolio standard by 2020. The most recent amendments to Title 24, Part 6, referred to as the 2016 standards, became effective on January 1, 2017. These standards are incorporated in the latest version of CalEEMod, which was used to estimate project emissions. However, the proposed project would be required to meet the most recent amendments to Title 24, Part 6, referred to as the 2019 standards, which became effective on January 1, 2020.

Supply, conveyance, treatment, and distribution of water for the project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the proposed project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use and associated electricity consumption from water use and wastewater generation were estimated using CalEEMod default values. However, compliance with CALGreen indoor and outdoor water reduction standards was assumed.

The proposed project would generate solid waste and would therefore result in CO_2e emissions associated with landfill off-gassing. The project was assumed to comply with the 50% diversion rate consistent with AB 341 (Chesbro, Chapter 476, Statutes of 2011) (25% increase from the solid waste diversion requirements of AB 939, Integrated Waste Management Act).

The estimated operational project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water supply, and wastewater treatment are shown in Table 3.8-1.

Table 3.8-1. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO_2e (MT/yr)
Area	<0.1
Energy	613.2
Mobile	754.2
Solid Waste	33.8
Water Supply and Wastewater	52.0
Total	**1,453.2**
Amortized Construction Emissions	16.4
Operation + Amortized Construction Total	**1,469.6**
BAAQMD GHG Threshold	*1,100*
Significant (Yes or No)?	***Yes***

Source: Appendix A.
Note: Total emissions may not sum due to rounding. Project GHG emissions are based on the "Mitigated" CalEEMod outputs in order to incorporate water reduction consistent with CALGreen and solid waste diversion rates consistent with AB 341, even though these would not be considered actual mitigation. Values of "<0.1" indicate that the estimated emissions are less than one decimals.
CO_2e = carbon dioxide-equivalent; MT/year = metric tons per year

Table 3.8-1 indicates that the GHG emissions associated with the proposed project would exceed the BAAQMD significance threshold of 1,100 MT CO_{2e} per year and would be potentially significant. The annual GHG emissions that the proposed project would need to be below would be approximately 377 MT CO_2e per year. However, with the additional purchase of carbon credits through implementation of Mitigation Measure GHG-1, the proposed project would offset excess GHG emissions and would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and this would represent a cumulatively **less-than-significant impact with mitigation.**

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

The City of Rohnert Park has a GHG reduction plan that focuses on municipal operations, and thus is not applicable to the proposed project. The City is working with other jurisdictions to implement the Sonoma County Community Climate Action Plan to serve all of Sonoma County; however, this plan has not yet been adopted. The City's 2040 General Plan will also address climate change to be compliant with State policies and address private development. The City anticipates adopting the 2040 General Plan sometime in late 2020/2021.

The Scoping Plan, approved by CARB on December 12, 2008, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. Relatedly, in the Final Statement of Reasons for the Amendments to the CEQA Guidelines, the CNRA observed that "[t]he [Scoping Plan] may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009). Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the

Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. To the extent that these regulations are applicable to the project, the project would comply will all regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Regarding consistency with Senate Bill (SB) 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order (EO) S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future-year analysis. However, CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the *First Update to the Climate Change Scoping Plan* that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the *First Update to the Climate Change Scoping Plan* states the following (CARB 2014):

> "This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under Assembly Bill 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions."

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and EO S-3-05. This is confirmed in *California's 2017 Climate Change Scoping Plan* (*2017 Scoping Plan*), which states, "This Plan draws from the experiences in developing and implementing previous plans to present a path to reaching California's 2030 GHG reduction target. The Plan is a package of economically viable and technologically feasible actions to not just keep California on track to achieve its 2030 target, but stay on track for a low- to zero-carbon economy by involving every part of the state" (CARB 2017). The *2017 Scoping Plan* also states that although "the Scoping Plan charts the path to achieving the 2030 GHG emissions reduction target, we also need momentum to propel us to the 2050 statewide GHG target (80% below 1990 levels). In developing this Scoping Plan, we considered what policies are needed to meet our mid-term and long-term goals" (CARB 2017).

The project would not interfere with implementation of any of the above-described GHG reduction goals for 2030 or 2050 because the proposed project would not exceed the BAAQMD's GHG threshold of 1,100 MT CO_2e per year after implementation of *Mitigation Measure GHG-1*, which was established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. Because the proposed project would not exceed the threshold after incorporation of Mitigation Measure GHG-1, this analysis provides support for the conclusion that the proposed project would not impede the state's trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050.

In addition, as discussed previously, the proposed project is consistent with the GHG emission reduction measures in the Scoping Plan and would not conflict with the state's trajectory toward future GHG reductions. Since the specific path to compliance for the state in regards to the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the project would be speculative and cannot be identified at this time.

With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet SB 32's 40% reduction target by 2030 and EO S-3-05's 80% reduction target by 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets.

Based on the above considerations, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and no mitigation is required. This impact would be **less than significant**.

Mitigation Measures

Mitigation Measure GHG-1: Prior to the City's issuance of the first building permit, the project applicant shall purchase voluntary carbon offsets on the Climate Action Reserve (CAR), CAPCOA Greenhouse Gas Reduction Exchange (GHG Rx), or other acceptable carbon registry, in order to reduce the project's emissions to below the BAAQMD threshold of significance of 1,100 MT CO_2e per service population per year. Based on the current modeling the project shall purchase 377.09 MT CO_2e amount of carbon offsets annually, which equates to 11,312.74 MT CO_2e (377.09 MT CO_2e x 30 years). The BAAQMD requires the lead agency to ensure that offsite measures for reducing GHG emissions are feasible, measurable, and verifiable. A certificate of purchase and proof of offset retirement shall be provided to the BAAQMD and the City. If overall land use development changes from what has been assessed in this document, the project applicant shall be required to show consistency with the analysis conclusions herein, which may include the purchase of additional carbon offsets, if required.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

A Phase I Environmental Site Assessment (ESA) was prepared for the project by ATC Group Services LLC (April 2017) to identify potential environmental conditions that may require further action. Based on the Phase I ESA, there was no evidence of environmental conditions on site and on adjacent sites. Thus, no recommendations for further actions were offered at the time. However, in November 2017 a Geotechnical Report prepared for the project by Gularte Associates indicated the presence of an unidentified pressurized gas with a sulphur odor. To further investigate this unidentified gas, a Phase II ESA was prepared by ATC. ATC installed four vapor monitoring probes to investigate the gas and provide additional insight regarding future mitigation measures/design of the proposed buildings. The results of the vapor probes indicated a small presence of methane gas from an unidentified source. Based on the geothermal activity on site, the presence of methane could change over time. Due to this, ATC recommended industry standard methane mitigation measures to prevent subsurface pressurization. Copies of the Phase I and Phase II ESAs are included in Appendix D.

A search of the Department of Toxic Substances Control (DTSC) Envirostor database was completed and there are several leaking underground storage tank (LUST) cleanup sites listed as close as 0.1 mile from the project site. However, these cleanups have all been completed and no further action is required. Based on the search, the project site is not included in or near any identified hazardous sites.

The closest schools to the project site are Pathways Charter School (0.5 mile southeast, John Reed Elementary School (1.3 miles southeast), and Marguerite Hahn Elementary School (1.4 miles northeast). There are no existing or proposed schools within one-quarter mile of the project site. The nearest airport is Petaluma Municipal Airport, located approximately 9.3 miles southeast of the project site. The Charles M. Schultz - Sonoma County Airport is located approximately 15 miles north in the City of Santa Rosa.

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

The project would include use of heavy equipment for construction. Fueling and maintenance of such equipment could result in incidental spills of petroleum products and hazardous materials during construction and in construction staging areas. Storage, handling, and use of hazardous materials would occur in accordance with standard construction best management practices (BMPs) to minimize the potential for spill or release and ensure that any such spill or release would be controlled onsite. Accordingly, such incidental spills would likely be minor. Standard construction BMPs include storing all hazardous materials inside buildings or under other cover, vehicle specifications for hazardous material transport and disposal, procedures for safe storage, and training requirements for those handling hazardous materials.

The project involves a proposed industrial development that would be marketed for uses ranging from light manufacturing to research and development. The two proposed buildings would be constructed as a "cold shell," with an unfinished interior and no heating, ventilation, or air conditioning. Future tenants would customize the space to their own specifications. As such, the hazardous materials present on-site would depend on tenant uses, which are currently unknown. Common hazardous materials such as paints and cleaning agents would likely be used at the project site. During operation, the proposed project would be required to use, store, and transport hazardous materials in compliance with applicable federal, state, and local regulations during project operation. As mentioned previously, BMPs related to hazardous materials would also be implemented. Therefore, impacts related to the creation of significant hazards to the public through routine transport, use, and disposal of hazardous materials during project operations would be **less than significant**.

b) Would the project 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?

A Phase I Environmental Site Assessment (Phase I ESA) of the project site was prepared in 2017 by ATC Group Services LLC (see Appendix D). The Phase I ESA found no recognized environmental conditions at the project site, and offered no recommendations for further action. There were also no potential environmental conditions identified at the adjoining properties. A review of aerial photographs identified historical agricultural use of the land. However, there was no evidence of large-scale use or disposal of pesticides, herbicides, or fertilizers. Evidence for overuse of these materials, such as stressed vegetation, was not observed. Thus, impacts related to upset and accident conditions would be **less than significant**.

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

The closest schools to the project site are Pathways Charter School (0.5 mile southeast), John Reed Elementary School (1.3 miles southeast), and Marguerite Hahn Elementary School (1.4 miles northeast). There are no existing or proposed schools within one-quarter mile of the project site. Therefore, there would be **no impact** associated with the use of hazardous materials within a quarter mile of the project site.

d) Would the project be located on a site that 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?

Pursuant to Government Code Section 65962.5, the State of California Hazardous Waste and Substances Site List (also known as the "Cortese List") is a planning document used by state and local agencies and developers to comply with CEQA requirements in providing information about the location of hazardous materials sites. The Phase I ESA included a database review provided by EDR, which determined that the project site was not listed on any hazardous materials sites, including sites within federal, state, tribal, and local databases. According to the California Department of Conservation EnviroStor database, there are several LUST cleanup sites listed as close as 0.1 mile from the project site. However, these cleanups have all been completed and no further action is required. Thus, there would be **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?

The closest airport is the Petaluma Municipal Airport, which is located 9.2 miles southeast of the project site. The project site is not located within an airport land use plan and is not within two miles of a public airport or public use airport. There would be **no impact**.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The project would not interfere with any adopted emergency or evacuation plans. The City's 2012 Emergency Management Plan (EMP) serves as the legal and conceptual framework for emergency management in the City of Rohnert Park. The EMP addresses planned responses to emergency situations associated with large-scale disasters, and establishes the primary responsibilities of each City department during such emergencies. The project would be consistent with allowed uses and would not involve any operations or activities that would interfere with the EMP. Additionally, the City approved the development of a new Public Safety facility (fire station) on the west side of Highway 101, southwest of the project site. Upon completion of the new fire station, response times in the project area would be reduced. Therefore, the project would have **no impact** related to implementation of emergency plans.

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

The City of Rohnert Park General Plan states that the potential for wildland fires varies within the City (City of Rohnert Park, 2000). The project site is in a local responsibility area (LRA) that does not contain any very high fire hazard severity zones (CAL FIRE 2008). Most of the area surrounding the project site is already developed with urban land uses. Fire suppression services in the project area are currently and would continue to be provided by the City of Rohnert Park. Because the project site is not in or near an area of high fire hazard severity, and because adequate fire protection services would be provided by the City's fire division, this impact would be **less than significant**.

Mitigation Measures

No mitigation measures are required.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on or off site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

The entire study area is located within the Laguna de Santa Rosa Watershed and is part of the Russian River basin. Drainage downstream from the project site would carry stormwater runoff to Hinebaugh Creek and Laguna de Santa Rosa and, eventually, to the Russian River. Water quality and stormwater runoff is regulated under a National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer system (MS4) stormwater permit

with the North Coast Regional Water Quality Control Board (RWQCB). The NPDES Permit and Waste Discharge Requirements reference the City of Santa Rosa's Low Impact Development Technical Design Manual (LID Manual) (2017). The manual provides technical guidance for project designs that require the implementation of permanent LID features and stormwater BMPs.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The project site is currently undeveloped and the project would allow for future development of two concrete tilt-up buildings for light manufacturing, warehouse, or research and development uses. Because the project is creating one acre or more of impervious area, the project is subject to the Hydromodification Control Requirement in the LID Manual. The Hydromodification Control Requirement states a condition to infiltrate and/or reuse 100% of the total calculated volume of stormwater generated by the developed site for a 1-inch rain event in a 24-hour period. To meet this requirement, the project would include bioretention areas sized in accordance with LID requirements to achieve the 100% volume capture goal. The total volume of storage required for the project would be reduced or increased based on the final area of new impervious surface. Design and construction of drainage systems per the Sonoma County Water Agency (SCWA) Flood Management Design Manual would ensure that storm drainage systems are adequately sized. Implementation of post-construction BMPs would reduce pollutants in stormwater runoff. Adherence to the SCWA Flood Control Design Criteria, LID Manual and associated BMPs, as well as adherence to state and local regulatory requirements, would ensure that potential water quality and runoff impacts from development at the project site would be **less than significant**.

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

Implementation of the proposed project would result in the development of impervious surfaces that could interfere with on-site groundwater recharge. The project is located within the Santa Rosa Plain Groundwater Basin. However, recharge areas typically occur east of the city along streambeds and others areas of high soil permeability (SCWA 2013). According to the Natural Resources Conservation Service Web Soil Survey, the project site is underlain by Clear Lake clay with poor drainage. Clay soil at the project site reduces permeability and slows the percolation of rainwater into the groundwater table. Thus, the project site is not considered an important recharge area, and development on the project site would not interfere substantially with sustainable groundwater management of the basin. Additionally, development associated with the project would be required to comply with the City's standards and current relevant BMPs. Therefore, impacts related to groundwater would be **less than significant**.

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

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

There are no streams or water courses on the site that would be altered by the project. However, development at the project site would require soil-disturbing activities for the placement of new structures on-site, which would alter drainage courses and runoff patterns from existing conditions. Alterations to existing drainage patterns or flow velocities could result in a short-term increase in

erosion or siltation that may have substantial adverse effects on water quality. Drainage-ways downstream from the project site would carry stormwater runoff to Hinebaugh Creek and Laguna de Santa Rosa and, eventually, to the Russian River, which would be subject to water quality deterioration.

The City requires all new development projects to design and construct storm drainage systems in accordance with the MS4 NPDES stormwater permit requirements, which references the City of Santa Rosa's LID Manual. Implementation of site-specific stormwater capture and treatment BMPs, post-construction stormwater pollution prevention BMPs, as well as maintenance and inspection requirements for those BMPs, would minimize erosion and siltation impacts from the project. In addition, SCWA reviews project drainage system plans for compliance with its Flood Management Design Manual. Compliance with these regulations would ensure that storm drainage systems are adequately sized to convey post-development runoff. Adherence to the NPDES permit requirements and LID Manual, and compliance with SCWA's design criteria would reduce impacts from erosion and siltation caused by changes in existing drainage patterns to a **less-than-significant level**.

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

Construction of the project would require soil-disturbing activities for placement of new structures on-site, which could alter drainage courses and runoff patterns from existing conditions. The project would adhere to specific construction BMPs to reduce the impact of ground disturbance and would reduce the impact on drainage and the rate or amount of surface runoff during construction and post project completion.

As described above, the proposed project would result in an increase of impervious surfaces. The City requires all new development projects to design and construct storm drainage systems in accordance with the MS4 NPDES stormwater permit requirements, which references the City of Santa Rosa's LID Manual. Design requirements include a condition to infiltrate and/or reuse 100% of the total calculated volume of storm water generated by the developed site for a 1-inch rain event in a 24-hour period. The LID Manual also includes BMPs for capturing, infiltrating, and/or reusing stormwater on-site. Through compliance with the MS4 permit requirements, the proposed project would not result in any increase in runoff volume in comparison to existing conditions, because 100% of any increase in stormwater volume would be required to be infiltrated and/or reused on-site.

In addition, SCWA reviews project drainage system plans for compliance with its Flood Management Design Manual. Compliance with these regulations would ensure that storm drainage systems are adequately sized to convey post-development runoff. With adherence to the MS4 permit requirements, LID Manual, Flood Management Design Manual, and relevant BMPs, the proposed project would not result in flooding or substantial polluted runoff, or exceed the capacity of existing or planned stormwater drainage systems. Accordingly, impacts would be **less than significant**.

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

Refer to the answer provided in "ii" above.

iv) impede or redirect flood flows?

Section 7.2, Drainage, Erosion, Stormwater, and Flooding of the City's General Plan and Community Panel Number 06097C0876E and 06097C0877E of FEMA's Flood Insurance Rate Maps for Sonoma County both place the project site outside the 500-year flood zone and the 100-year flood hazard area. Thus, the project would have **no impact** related to impeding or redirecting flood flows.

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

As discussed previously, the project site is outside the 500-year flood zone and the 100-year flood hazard area. There are no dams or levees in the vicinity of the project site. The project would not expose people or structures to significant loss related to flooding. The project site is physically removed from any large body of water and is not subject to inundation by seiche, tsunami, or mudflow. Therefore, the project would have **no impact** related to flooding or other water-related hazards.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The project would comply with all applicable water quality control plans, including the North Coast RWQCB's Basin Plan. As discussed previously, the project would also adhere to the MS4 permit requirements, LID manual, Flood Management Design Manual, and applicable BMPs. The City's local groundwater supply is from the Santa Rosa Plain Subbasin of the Santa Rosa Valley Groundwater Basin. The City manages its groundwater supply in accordance with its 2004 Water Policy Resolution, which limits groundwater pumping to 2,577 AFY. The City's 2004 City-wide Water Supply Assessment provides the technical support for this maximum pumping rate. The City participates actively in the implementation of the Santa Rosa Plain Watershed Groundwater Management Plan and is currently working with other water suppliers in the basin to implement the requirements of the Groundwater Sustainability Act of 2014. Modeling and monitoring data collected by the City and others indicate that groundwater levels are generally rising around the City's well field, an indication of stable supply. Over the past 10 years the City has used between 350 and 1,600 acre-feet per year (AFY) of groundwater, significantly less than its policy limitation on groundwater use (City of Rohnert Park, 2016). As such, there would be **no impact** related to conflict or obstruction of a water quality control plan or sustainable groundwater management plan.

Mitigation Measures

No mitigation measures are required.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

a) Would the project physically divide an established community?

The project would be constructed on what is currently an undeveloped parcel in a primarily industrial area of the City. The project does not include any features that would physically divide an established community, and the proposed use would be consistent with the land uses of the surrounding area. The project would have **no impact** related to the physical division of an established community.

b) Would the project 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?

The City's General Plan designates the project site for Industrial uses and the site is also zoned Industrial. The City's General Plan states that the Industrial land use designation accommodates corporate headquarters, research and development facilities, offices, light manufacturing, warehousing, and similar industrial uses (City of Rohnert Park, 2017). The project is a proposed industrial development, with space marketed for permitted industrial uses, such as light manufacturing, research and development, and warehousing. As such, the project would be consistent with the City's General Plan, as well as the Zoning Map and other City plans and policies. Additionally, as discussed in Section 3.3, Air Quality, and Section 3.4, Biological Resources, the proposed project would comply with related plans including the Clean Air Plan and the Santa Rosa Plain Conservation Strategy. Accordingly, the project would have **no impact** regarding potential conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation Measures

No mitigation measures are required.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

The California Department of Conservation, Division of Mines and Geology has not identified significant mineral resources within the project site. The project site is classified as being within Mineral Resource Zone 1 (MRZ-1), which refers to areas areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources (DOC 2013). The City's General Plan designates the site as Industrial land and does not identify any mineral resources (City of Rohnert Park 2017).

a) Would the project 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?

The California Department of Conservation (DOC) provides maps that classify lands according to the significance of mineral resource deposits within the area. The CDC designates the project site as being within Mineral Resource Zone 1 (MRZ-1), which describes areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources (DOC 2013). The closest area with significant mineral resources is the Stony Point Rock Quarry in Cotati, which has been classified MRZ-2a for Class II Base-grade aggregate (DOC, 2005). The Stony Point Rock Quarry is located approximately 2.4 miles from the southwestern edge of the project site. There are no known mineral resources on the project site and the site is not delineated on the City's General Plan as a mineral resource recovery site (City of Rohnert Park 2017). Accordingly, the project would have **no impacts** related to the loss of availability of mineral resources.

b) Would the project 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?

Refer to answer provided in 'a' above.

Mitigation Measures

No mitigation measures are required.

3.13 Noise

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

An Acoustical Analysis of the project site was prepared in February 2020 by Ostergaard Acoustical Associates (OAA) and is included in Appendix E. OAA conducted a high-level sound study to evaluate the acoustical risk of the proposed project using assumptions derived from OAA's experience with facilities of this nature. The Acoustical Analysis discusses noise impacts that would occur from the project, primarily from vehicles accessing the project site, with Dowdell Avenue as the primary entryway. The Acoustical Analysis also includes the proposed 10-foot property line sound wall along the south boundary.

a) ***Would the project result in 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?***

Commercial uses adjacent to project site are within the City of Rohnert Park, and therefore noise levels at these properties are governed by the City's General Plan Noise Element and Noise Ordinance. Chapter 17.12 of the Rohnert Park Code of Ordinances offers performance standards. It states:

A. No uses or activities shall create noise levels which exceed the following standards:

Table 3.13-1. City of Rohnert Park Maximum Noise Levels (dBA) [1]

Zoning District	Measured at Property Line or District Boundary	Measured at any Boundary of a Residential District	Between 7PM and 7AM measured at any boundary of a residential zone [4]
Residential	60 [2]	N.A.	50 or ambient noise level
Commercial	70	60	50 or ambient noise level
Industrial [4]	70 [3]	60	50 or ambient noise level
Mixed Use	65 [2]	60	50 or ambient noise level
Public/Institutional	65	60	50 or ambient noise level
Open Space	65	60	50 or ambient noise level

Notes:
1 Levels not to be exceeded more than 5 minutes in any hour
2 The maximum interior noise level for residential uses shall be forty-five dBA with all openings closed.
3 For commercial and industrial properties, the measurement shall be at the property line of the use or activity.
4 Restricted hours may be modified through conditions of an approved conditional, administrative, or temporary use permit.

B. The noise standards above shall be modified as follows to account for the effects of time and duration on noise levels:

1) Noise that is produced for no more than a cumulative period of five minutes in any hour may exceed the above standards by five dBA except between the hours of 7:00 PM and 7:00 AM.

2) Noise that is produced for no more than a cumulative period of one minute in any hour may exceed the above standards by ten dBA except between the hours of 7:00 PM and 7:00 AM.

3) Mechanical and electrical equipment shall provide adequate shielding and baffling so that noise levels from such equipment will not exceed the above noise levels when measured at the property line.

C. Noise shall be measured with a sound level meter that meets the standards of the American National Standards Institute. Noise levels shall be measured in decibels (dBA) on a sound level meter using the A-weighted filter network. Calibrations checks of the instrument shall be made at the time any noise measurement is made. Excluded from these standards are occasional sounds generated by the movement of public safety vehicles and railroad equipment.

D. New development within existing of project sixty-five dBA noise corridors shown in the general plan shall undergo a technical acoustical analysis by a professional acoustical engineer, which shall serve as the basis for designing mitigation measures.

Because the project site is located in an industrial district, the maximum noise level permitted is 70 dBA measured at the district boundary with no time restrictions. During the day, any noise above this should not exceed a cumulative period of five minutes in any hour. During the nighttime hours, defined as 7:00 p.m. to 7:00 a.m., the noise level cannot exceed 75 dBA for a cumulative period of five minutes in any hour, 80 dBA for a cumulative period longer than one minute in any hour.

The City of Rohnert Park Code of Ordinances further discusses noise in Chapter 9.44. The code states that site sound emissions should not exceed the ambient base levels provided at the receiving property line. Minimum ambient sound levels of 70 dB(A) are given in Section 9.44.040 for a Limited Industrial District.

The project site is adjacent to the Stadium Lands Planned Development to the south. No specific ambient sound levels are provided for a Planned Development District, however, the Stadium Lands Planned Development is considered mixed use. The code states that sound emissions should not exceed 65 dB(A) at the property line of a mixed use district. The 65 dB(A) limit is the most stringent City noise standard applicable to the proposed project.

While operations for the site are not yet known, typical warehouse site operation includes employee vehicle activity primarily during the daytime hours, with intermittent truck arrivals and departures. An Acoustical Analysis was prepared by OAA in February 2020, to estimate sound levels at the site and nearby receptors (see Appendix F). The Acoustical Analysis included a ten-foot tall concrete masonry sound wall proposed along the southern boundary adjacent to residences to mitigate off-site sound. Based on previous sound surveys, a line-haul heavy truck produces maximum sound pressure levels in the 74 to 79 dB(A) range at 50 feet. Box trucks typically produce slightly lower sounds levels of 70 dB(A) at 50 feet, while vehicles exhibit even lower maximum sound pressure levels, nominally 59 dB(A) at 50 feet. These maximum sound levels were projected at nearby residences, including the 10-foot sound wall in the analysis, to compare with the city's applicable code limits.

Trucks would be about 35 feet from the south property line when entering the site from Dowdell Avenue. Accounting for the sound wall attenuation, property line sound levels from line haul trucks about 35 feet away would be about 65 dB(A). Elevated second story windows may not receive full screening from the sound walls, but are further away from the property line and would meet the code limit from a distance of 140 feet away. The majority of high-level truck activity would occur in the loading dock area. Activity at the nearest on-site dock projected to the nearest residential receptor 250 feet away shows levels of 56 to 65 dB(A) without the sound wall. Vantage points screened by the building or sound wall would be further reduced by 5 to 10 dB. Emissions of this magnitude again comply with the city's mixed-use district limit. These are conservative estimates, as calculations above were done assuming line-haul heavy trucks would be the main trucks entering the property. A box truck is about 4 to 9 dB(A) lower in level, and hence would result in reduced noise levels. Employee vehicles entering the site would also be screened by the sound wall when nearest the property line and would result in maximum sound levels in the low 50s on the A-weighted scale. With the help of a sound wall, the city's code limit of 65 dB(A) is expected to be complied with both at the property line as well as at upper story residential receptors.

In consideration of the above, project impacts would not conflict with any applicable noise standards and impacts would be **less than significant**.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

The primary source of groundborne vibration from the proposed project would be vehicular travel, including employee vehicles and trucks. However, according to the Federal Transit Administration (FTA), the perceptibility threshold for transit groundborne vibration is approximately 65 vibration decibels (VdB), and human response to vibration is not distinctly perceptible until vibration reaches 75 VdB (FTA 2018). The FTA states that trucks typically generate groundborne vibration levels around 63 VdB at a 50 feet distance, and these levels could reach 72 VdB when trucks pass over road bumps. Both of these vibration levels are below the distinctly perceptible level of 75 VdB set by the FTA. As the nearest residential receptor is 250 feet away, the project would not result in generation of excessive groundborne vibration or groundborne noise levels. As such, impacts from the proposed project would be **less than significant**.

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

The closest airport is the Petaluma Municipal Airport, which is located 9.2 miles southeast of the project site. The project site is not located within an airport land use plan and is not within two miles of a public airport or public use airport. Thus, the project would not expose people residing or working in the project area to excessive noise from airports or airstrips. There would be **no impact**.

Mitigation Measures

No mitigation measures are required.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

The project site is undeveloped and does not include any housing or residents. The closest residences are located adjacent to the southern boundary of the proposed project site. These residences are part of the Fiori Estates apartment complex.

a) Would the project 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)?

The project involves a proposed industrial development that would be marketed for uses ranging from light manufacturing to research and development. The number of new positions (employees) resulting from the project would depend on which tenants purchase space in the building. The project would include 291 parking spaces for tenants and future employees. It is anticipated that these new positions would be filled by people already residing in the region. The project is not large enough to induce substantial population growth resulting in the need to construct new homes and provide new services for this new population. Therefore, the proposed project would not directly induce population growth because it proposes no

significant employment generating uses, other than staffing associated with the future building tenants. Additionally, growth within the City's Urban Growth Boundary (UGB), which includes the area within current city limits as well as annexed and specific plan areas, was anticipated in the City's General Plan. There are plans and programs to address the potential impacts from population growth, including General Plan policies and a growth management program.

The project would not extend roads or infrastructure that would indirectly induce new growth. In addition, the project would not displace people or housing because the site is currently vacant and does not provide any housing. Therefore, the project would not induce new growth and would result in a **less-than-significant impact**.

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

The project site does not currently support any housing or residential uses. No housing or residents would be displaced by the proposed project; therefore, the project would have **no impact** on housing or require construction of new housing.

Mitigation Measures

No mitigation measures are required.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

The City of Rohnert Park Department of Public Safety (DPS) provides police and fire protection services within the city. DPS personnel are cross-trained and managed under a single administrative umbrella. The Police Services Patrol Division operates as a typical police department and provides police services 24/7 (City of Rohnert Park, 2016a). The Fire Services Division functions as a typical municipal fire agency, and public safety officers within this division are also available to respond to police incidents as needed (City of Rohnert Park, 2016b). DPS staff operate out of three Public Safety stations in the city. The main station is located at 500 City Center Drive, located in the center of Rohnert Park. Two Public Safety stations operate primarily as fire stations and are located in the northern

and southeastern parts of the city. Additionally, the City approved the development of a new Public Safety station (fire station) on the west side of Highway 101, southwest of the project site.

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

Police or fire protection?

Tenants and employees at the proposed development may require the services of DPS in the event of an emergency. Currently, the nearest Public Safety station is the Main Station located approximately one mile from project site. Emergency response times would be reduced upon completion of the new Public Safety station located 0.2 of a mile southwest of the project site (City of Rohnert Park 2016d).

The City's General Plan includes goals and policies to aid the effective provision of police, fire, and emergency management services within the City. This includes General Plan Policy HS-21, which requires regular maintenance and updates to the Standardized Emergency Management Plan. As discussed previously, the project would not induce substantial population growth. As such, the project would not require an expansion of the existing fire station or the construction of a new one in order to maintain acceptable service ratios, response times, or other performance objectives. The project would comply with all standards and regulations for adequate fire access and safety. For example, the project would comply with the Uniform Fire and Building Codes and the City's DPS hydrant requirements to ensure adequate water pressure and water is available in the event of a fire. A Water Study was conducted for the site by Morton & Pitalo, which concluded that fire flow water demand requirements for the project are within conformance of the City's and Fire District's standards (Morton & Pitalo 2020). The buildings would be constructed to meet current California Building Code standards that would require inclusion of sprinklers to reduce fire hazards. For these reasons, the project would result in a **less-than-significant impact** on the City's fire and police protection services.

Schools?

The proposed project does not include any residential uses; therefore, the project would not result in a population increase that would require new schools to serve new City residents. For this reason, **no impact** on schools would result with development of the proposed project.

Parks or Other Public Facilities?

As discussed previously, the project would not induce substantial population growth. The project would not introduce a new population to the City needing access to parks or other public facilities or services. Therefore, **no impact** on parks other public facilities would occur.

Mitigation Measures

No mitigation measures are required.

3.16 Recreation

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

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?

The closest recreational facilities to the project site are the Scandia Family Fun Center (0.2 mile northeast), Roberts Lake Dog Park (0.8 mile northeast) and Dorotea Park (1 mile east). The proposed project is not expected to induce substantial population growth that would increase demand for existing park or recreational facilities or require the construction of new or expansion of existing recreational facilities. The project does not include housing or any other features that would induce substantial residential growth. Implementation of the project would not be expected to create an increase in use of recreation facilities, such that physical deterioration of the facilities would occur or be accelerated. Therefore, **no impacts** to recreational facilities would occur.

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?

The project proposes to construct industrial buildings. There are no recreational facilities proposed as part of the project and none would be required to be constructed or expanded as a result of the project. Therefore, **no impact** to recreational facilities would occur.

Mitigation Measures

No mitigation measures are required.

3.17 Transportation

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

A Traffic Impact Study (TIS) was completed in September 2019 by W-Trans to evaluate the potential transportation impacts that would occur from the proposed project. The TIS estimated an increase of 800 new daily trips, including 83 added trips during the a.m. peak hour and 69 added during the p.m. peak hour. The TIS analyzed the project's impact on the City's level of service (LOS) and evaluated transportation scenarios including existing conditions, existing plus project conditions, and existing plus approved peak hour conditions plus project conditions. The results from the TIS are used to inform the analysis below. The City's General Plan includes policy TR-1 which establishes LOS C as the minimum standard for all arterial and collector roadway segments ("segments") and intersections, except for (1) those specified segments and intersections for which allowable LOS standards are otherwise established below; and (2) segments and intersections that are operating at LOS D or lower at the time an application for a development project or a specified plan is submitted if no feasible improvements exist to improve the LOS. The then-existing LOS may be permitted to be the standard for those segments and intersections in category (2), provided that the LOS not be permitted to deteriorate further due to the proposed development project or specific plan.

In the project vicinity, Class II bike lanes exists on Dowdell Avenue and Redwood Drive. Business Park Drive and Labath Avenue are signed bicycle routes (Class III). The future segment of Dowdell Avenue to the north of Business Park Drive will include a planned multi-use path (Class I) per the Rohnert Park Bicycle & Pedestrian Master Plan and the City of Rohnert Park Northwest Specific Plan. The City of Rohnert Park Northwest Specific Plan indicates future bike lanes on Business Park Drive and Labath Avenue.

The project site is served by two bus stops through SCT. One stop is located 0.18 mile from the site near the intersection of Business Park Drive and Redwood Drive. The second stop is also located 0.18 mile from the site near the intersection of Martin Avenue and Labath Avenue.

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

According to the TIS, the proposed project is expected to generate an average of 800 daily trips, including 83 trips in the a.m. peak hour and 69 trips during the p.m. peak hour. With the addition of project-generated trips, it was determined that all study intersections would continue operating at the same levels of service. Because the levels of service at these intersections would not further degrade upon the addition of project-generated traffic, the project's impacts would be considered less than significant.

The TIS also determined that bicycle facilities serving the project site are generally adequate, but would be further improved by the installation of planned bike lanes on Business Park Drive near the project site. Transit facilities serving the project site were also determined to be adequate.

The project's primary access point on Dowdell Avenue is anticipated to operate effectively, making use of the existing two-way left-turn lane and minimizing the potential for conflicts to result at the adjacent Business Park Drive/Dowdell Avenue intersection.

The TIS recommends that the project should pay traffic impact mitigation fees as a means of contributing funds toward future circulation infrastructure improvements in the vicinity including those identified in the City of Rohnert Park Northwest Specific Plan. As recommended, the main access driveway is located on Dowdell Avenue where the existing two-way left-turn lanes will facilitate left turns into and out of the site. The TIS also recommends installation of crosswalks across project access points on both Business Park Drive and Dowdell Avenue if these driveways are to be configured with standard curb returns. On-site pedestrian connections between buildings and to adjacent public sidewalks on Dowdell Avenue and Business Park Drive should also be provided. It was determined the project should also be responsible for installing on-street (Class II) bicycle lanes on Business Park Drive along its frontage, and for constructing a raised median at its driveway on Business Park Drive to physically restrict access to right turns. The proposed project would not conflict with the City's General Plan policy which requires a LOS C as the minimum standard for all arterial and collector roadway segments and intersections impacts. The City's General Plan does not include any goals or policies that address transit, bicycle or pedestrians. However, the proposed project would provide two bicycle racks and is served by two bus stops. The proposed project would not conflict with any plan, ordinance or policy and impacts would be **less than significant.**

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

Since the VMT metric will be required starting on July 1, 2020, and since the City has not adopted specific VMT methodologies, guidelines, or criteria, a VMT analysis was not prepared for the proposed project. The project would be approved before July 1, 2020, the statewide implementation date of SB 743, which requires the use of vehicle miles travelled (VMT) as the metric for transportation impact analysis (CalTrans 2019). Thus, there would be **no impact**.

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

The proposed project does not include any design features that could be considered hazardous or incompatible with existing uses. The project proposes site circulation improvements such as construction of two curb cuts for vehicle access from Dowdell Avenue and Business Park Drive, and a right turn pocket at the entrance off Business Park Drive. The proposed project does not include any geometric design

features such as sharp curves or dangerous intersections, and would not involve any new and incompatible uses. The TIS also determined that sight distances at the project driveways are adequate. There would be **no impact**.

d) Would the project result in inadequate emergency access?

Access to the site would be provided from Dowdell Avenue and Business Park Drive, as shown on Figure 3. Buildout of the proposed project would not result in inadequate emergency access, or affect the accessibility of any roads or emergency access points. The project would not interfere with any adopted emergency or evacuation plans. As mentioned in Section 3.9, Hazards and Hazardous Materials, the City's 2012 EMP serves as the legal and conceptual framework for emergency management in the City of Rohnert Park. The project would be consistent with allowed uses and would not involve any operations or activities that would interfere with the EMP. Therefore, the project would have **no impact** related to inadequate emergency access.

Mitigation Measures

No mitigation measures are required.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

The project is subject to compliance with AB 52 (California Public Resources Code, Section 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process and requires the CEQA lead agency to notify any groups (who have requested notification) and are traditionally or culturally affiliated with the geographic area of the project.

The only Native American tribe that has requested notification of future projects in the City is the Federated Indians of Graton Rancheria (Tribe). The City sent a notification letter pursuant to AB 52 to the Tribe on October 31, 2019. The City initiated government to government consultation with the Tribe at the tribe's offices on November 6, 2019.

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)?

The Native American Heritage Commission (NAHC) provided a review of their Sacred Lands files on October 29, 2019, which indicated that there is no specific information on the site in the NAHC's Sacred Lands File. At the meeting with the City on November 6, 2019, the Tribe did not indicate the site contains any known tribal cultural resources (TCRs). However, because an unknown TCR could be unearthed during construction activities, implementation of mitigation measures CUL-1 and CUL-2, described above in Section 3.5, Cultural Resources, would ensure that if any tribal cultural resources, artifacts, cultural deposits, or human remains are found, all work shall cease and the findings shall be evaluated by qualified personnel. Therefore, impacts would be **less-than-significant with mitigation.**

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

Refer to the answer provided in 'a' above.

Mitigation Measures

Refer to Section 3.5, Cultural Resources, for Mitigation Measures CUL-1 and CUL-2.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. 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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Would the project 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?

The project would be served by the existing water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications infrastructure near the project site, with new service connections provided for the new building.

The project would connect to an existing 2.5 inch domestic water service line, valve, meter and backflow device. The existing water supply facilities are expected to provide an adequate supply of water to meet the project's anticipated daily demand. The proposed project alone would not require the Sonoma County Water Agency (SCWA) to construct, relocate, or expand facilities, or to increase existing water entitlements. As discussed in criterion 'b' below, the SCWA has an adequate supply to meet the demands associated with the project area. Therefore, the water supply and related facility impacts would be **less than significant**.

The project would also connect to the existing sanitary system from a point of connection near the southern boundary of the site, and a 6-inch sanitary sewer cleanout located near the proposed center loading docks. Wastewater treatment and disposal are provided by the Santa Rosa Subregional Water Reclamation System, which also serves the cities of Santa Rosa, Sebastopol, and Cotati. Wastewater from the Subregional System is treated at the Laguna Treatment Plant, located about two miles northwest of Rohnert Park. The Laguna Treatment Plant has an overall average plant flow of 20.37 million gallons per day (MGD) and an average daily dry weather flow of 14.5 MGD (City of Santa Rosa 2017b). The City owns capacity rights to 3.43 MGD and has an agreement with the City of Santa Rosa to use up to 4.46 MGD of capacity rights. Under the Subregional System's approved Incremental Recycled Water Program, the City can acquire up to 5.15 MGD of capacity (City of Santa Rosa 2016). As of 2015, the City's capacity needs were approximately 3.0 MGD (City of Rohnert Park 2016e), meaning that up to 2.15 MGD of capacity is available to serve new development. The proposed project would not have any special uses such that wastewater generation would be higher than those from typical office/light industrial operations. According to the Site Plan (see Figure 3, Site Plan), the proposed project would consist of approximately 7% office space and 93% warehouse space. The City's 2019 Manual of Standards includes quantified assumptions for sewer generation for different Non-Residential uses. According to these assumptions, offices generate approximately 110 gallons per day (gpd) per 1,000 gross square feet (gsf), while warehouse uses generate approximately 40 gpd per 1,000 gsf (City of Rohnert Park 2019). Based on these assumptions, the project would generate about 8,082 gpd of wastewater. This amount of wastewater generation is significantly less than the City's remaining 2.15 MGD of wastewater capacity rights. Thus, the proposed project would not directly require or result in upgrades to the existing wastewater treatment plant, and impacts would be **less than significant**.

Storm water from the proposed project would be routed though a storm drain inlet at a bioretention planter along Dowdell Avenue, connecting to an existing 12-inch storm drain line. As described in Section 3.10, Hydrology and Water Quality, the proposed project would result in an increase of impervious surfaces at the site. The City requires all new development projects to design and construct storm drainage systems in accordance with the MS4 NPDES stormwater permit requirements, which references the City of Santa Rosa's LID Manual. Design requirements include a condition to infiltrate and/or reuse 100% of the total calculated volume of storm water generated by the developed site for a 1-inch rain event in a 24-hour period. The LID Manual also includes BMPs for capturing, infiltrating, and/or reusing stormwater on-site. Through compliance with the MS4 permit requirements, the proposed project would not result in any increase in runoff volume in comparison to existing conditions, because 100% of any increase in stormwater volume would be required to be infiltrated and/or reused on-site. Thus, there would be no need for new or expanded stormwater drainage systems, and impacts would be **less than significant.**

Pacific Gas and Electric Company (PG&E) provides gas and electricity services in the City. As discussed in Section 3.6, Energy, the project plans to comply with the most current Title 24 California Building Code/Code of Regulations (2016), CAL Green Code, California Green Building Standards Code (2016), and 2016 energy standards at the time of building construction, as amended by the State of California and City of Rohnert Park. The project includes the construction of two "cold shell" buildings and any future tenants would be responsible to comply with all Title 24 energy requirements. The project does not include the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Therefore, no new or expanded facilities would need to be built and impacts would be **less than significant**.

Telecommunications usage at the site would be dependent on the tenants that move in. If determined to be needed, and if it is deemed possible that there would be a potential effect to the environment, the new or expanded telecommunications facilities would be subject to separate CEQA review. It is reasonably assumed that site operation would not require more telecommunications service than typical light industrial uses. Thus, this impact would be **less than significant.**

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

The City has three water sources: SCWA supply, local groundwater, and recycled water. The City manages these supplies using a "conjunctive use" strategy, drawing on SCWA and recycled-water supplies first and using its local groundwater to manage peak demands. The total supply available to the City through these three sources is 11,427 acre-feet per year (AFY), including 10,077 AFY of potable water and 1,350 AFY of recycled water (City of Rohnert Park 2016f). Under its contract with SCWA, the City has access to as much as 7,500 AFY, although a number of conditions can limit the SCWA supply. Between the years 2006 and 2016, the City used between 2,500 and 5,000 AFY of SCWA supply, which is significantly less than its maximum allocation (City of Rohnert Park 2016f).

The City's local groundwater supply is from the Santa Rosa Plain Subbasin of the Santa Rosa Valley Groundwater Basin. The City manages its groundwater supply in accordance with its 2004 Water Policy Resolution, which limits groundwater pumping to 2,577 AFY. The City's 2004 City-wide Water Supply Assessment provides the technical support for this maximum pumping rate. Between the years 2006 and 2016, the City used between 350 and 1,600 AFY of groundwater, significantly less than its policy limitation on groundwater use (City of Rohnert Park 2016f).

The City's tertiary-treated recycled-water supply is produced by the Santa Rosa Subregional Water Reclamation System. The City and the Subregional System have entered into a producer/distributor agreement that provides the City with access to 1,350 AFY of recycled water. The City uses recycled water primarily for irrigation purposes; demand for recycled water has varied between 800 and 1,100 AFY over from the years 2006 through 2016 (City of Rohnert Park 2016f).

The City completed its 2015 Urban Water Management Plan Water Demand and Water Conservation Measures Update, which projects the City's potable water demands through 2040 based on Association of Bay Area Governments (ABAG) population and job projections. This demand is expected to range between 5,600 and 6,100 AFY, depending on the level of water conservation undertaken by the City. This projected demand is significantly less than the City's available water supplies. This analysis also indicates that the City has the potential to secure approximately 500 AFY (the difference between 5,600 and 6,100 AFY) by undertaking more aggressive water conservation activities (City of Rohnert Park 2016e). As discussed in Section 3.6, Energy, the project plans to comply with the California Green Building Standards Code, which also includes measures to reduce wasteful water use from landscape irrigation systems. The existing water supply sources are expected to be sufficient to provide an adequate supply of water for the project. Development at the project site would not require SCWA to increase its existing water entitlements, and it is reasonably assumed SCWA has an adequate supply to meet the demands associated with the proposed project during normal, dry, and multiple dry years. There would be no unique uses as part of the proposed project that would increase water demand significantly. Additionally, as most water used for the project would be used and turned into wastewater, the estimated 8,082 gpd (or 9.125 AFY) of wastewater that

would be generated also indicates that water demand would not exceed the City's water supplies. Impacts associated the water supply for the project would be **less than significant**.

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

Refer to the answer provided in 'a' above.

d-e) Would the project 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?

Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The North Bay Corporation provides solid waste disposal and composting of organic materials in the City. Waste would be disposed of at the Central Disposal Landfill, which has maximum daily throughput of 2,500 tons per day (City of Rohnert Park 2016f). The Landfill has sufficient permitted capacity to accommodate the project's disposal needs.

Assembly Bill (AB) 939 requires the City to develop and implement a solid waste management program. PRC Section 41780(a)(2) also requires cities and counties to divert 50% of the solid waste produced within their respective jurisdictions through source reduction, recycling, and/or composting activities. Since 2007, Senate Bill 1016 has required cities to report to the California Integrated Waste Management Board (now known as CalRecycle) the amount of garbage disposed in the landfill per person per day. According to CalRecycle's jurisdiction/disposal rate for the 2011 reporting year (CalRecycle 2013), the residential disposal target is 7.1 pounds per person per day. Rohnert Park's annual residential disposal rate of 3.6 pounds per person per day met this target in 2014. The employee disposal target (18.3 pounds per employee per day) was also met, with an actual employee disposal rate of 10.2 pounds per employee per day. The project would not contain features that would generate waste flows at rates that would exceed typical disposal rates for the City; therefore, the project would have a **less-than-significant impact** on the demand for solid waste collection and disposal in the City.

Mitigation Measures

No mitigation measures are necessary.

3.20 Wildfire

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

The project site is not located in an area classified as a very high fire hazard severity zone or located near a state responsibility area (CAL FIRE 2008). The project site is located within a local responsibility area (LRA). Most of the area surrounding the project site is developed with a mix of urban land uses.

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project would not interfere with any adopted emergency or evacuation plans. As discussed in the Hazards and Hazardous Materials section, the project would not interfere with the City's EMP. The project does not include any operations of activities that would potentially interfere with or impair emergency response plans. Fire suppression services in the project area are currently and would continue to be provided by the City of Rohnert Park DPS. Additionally, the City approved the development of a new Fire Station on the west side of Highway 101, southwest of the project site. Upon completion of the new fire station, response times to the project site would be reduced. Therefore, the project would have **no impact** related to implementation of emergency plans.

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

The project site is in a local responsibility area (LRA) that does not contain any very high fire hazard severity zones (CAL FIRE 2008). Most of the area surrounding the project site is developed with a mix of urban land uses. According to the City's Local Hazard Mitigation Plan, the risk of wildland fires in Rohnert Park is generally low compared to other cities in Sonoma County. The City's development patterns, relatively compact nature, and urban growth boundary have prevented the city from expanding into the surrounding hillsides where the risk of fire is greater. The existence of active agriculture on three sides of the City, as well as the presence of the City of Cotati to the south, lower the chances for an extreme fire event. The City performs regular abatement of grassland areas adjacent to and within the city limits to mitigate fire risk. Thus, there would be a **less-than-significant impact** related to wildfire risks.

c) Would the project 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?

As described in the Hazards and Hazardous materials section, wildfire risk at the project site is low, as the site is not within a very high fire hazard severity zone designated by CAL FIRE and most of the area surrounding the project site is already developed with urban uses. The project would require electrical wiring and utility extensions, however, this would not exacerbate fire risk as the project site is located in an area that is already served by existing utilities. Therefore, the proposed project would have a **less-than-significant impact** regarding fire risk associated with new infrastructure.

d) Would the project 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?

The proposed project site is relatively flat and within an urbanized area that does not contain a significant risk of flooding, landslides, slope instability, or drainage changes. As noted in the Geology and Soils and Hydrology and Water Quality impact discussions, the proposed project would have a **less-than-significant impact** regarding landslides, flooding, and runoff. There would be no new or increased impacts resulting from the proposed project.

Mitigation Measures

No mitigation measures are necessary.

3.21 Mandatory Findings of Significance

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

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

To ensure that the proposed project does not 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, or reduce the number or restrict the range of a rare or endangered plant or animal, mitigation measures BIO-1 through BIO-4 are required to ensure project construction or operation would not degrade the environment or adversely impact protected species as well as their habitat.

To ensure that cultural and paleontological resources impacts are less than significant, mitigation measures CUL-1, CUL-2, and GEO-1 are required to ensure the proper protocol is followed in the event any cultural or paleontological resources are unearthed during construction. Thus, there would be a **less-than-significant impact 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)?

The analysis provided throughout this IS/MND demonstrates that the project's contribution to any existing cumulative impacts would be reduced to less-than-significant levels through mitigation and any contribution to an existing cumulative impact would be very small and would not be considered cumulatively considerable. Therefore, the project's cumulative impact would be **less than significant.**

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

The analysis provided throughout this IS/MND identifies project impacts that may be potentially significant and identifies mitigation measures that would reduce each impact to a less-than-significant level. As discussed in Section 3.8, Greenhouse Gas Emissions, the proposed project without mitigation would exceed GHG significance thresholds. With implementation of mitigation measure GHG-1, which would involve the purchase of carbon offsets to reduce the project's emissions below the BAAQMD threshold of significance of 1,100 MT CO_2e per service population per year, the proposed project would not impede the state's trajectory toward statewide GHG reduction goals for 2030 or 2050. As such, the impact is **less-than-significant with mitigation incorporated.**

4 References and Preparers

4.1 References Cited

14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

BAAQMD (Bay Area Air Quality Management District). 2010. *California Environmental Quality Act Air Quality Guidelines*. May 2010. Accessed March 2017. http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/draft_baaqmd_ceqa_guidelines_may_2010_final.pdf?la=en.

BAAQMD. 2012. *California Environmental Quality Act Air Quality Guidelines*. Updated May 2012. Accessed March 2017. http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines_Final_May%202012.ashx?la=en.

BAAQMD. 2017a. *California Environmental Quality Act Air Quality Guidelines.* Updated May 2017. http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

BAAQMD. 2017b. *Spare the Air: Cool the Climate - Final 2017 Clean Air Plan*. April 19, 2017. http://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en.

California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.

CAL FIRE (California Department of Forestry and Fire Protection). 2008. Sonoma County Very High Fire Hazard Severity Zones in LRA. November 10, 2008. Available at: https://osfm.fire.ca.gov/media/6820/fhszl_map49.pdf

CalRecycle (California Department of Resources Recycling and Recovery). 2013. Jurisdiction Diversion/Disposal Rate Detail for Sonoma County Waste Management Agency, Reporting Year 2011. Available: https://www2.calrecycle.ca.gov/LGCentral/%20DiversionProgram/JurisdictionSummary/503/Year/2011

CAPCOA (California Air Pollution Control Officers Association). 2008. *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. January 2008.

CARB. 2017. California's 2017 Climate Change Scoping Plan. November 2017. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf

CAT (California Climate Action Team). 2006. Climate Action Team Report to the Governor Schwarzenegger and the Legislature. Sacramento, California. March 2006. http://www.climatechange.ca.gov/climate_action_team/reports/2006report/2006-04-03_FINAL_CAT_REPORT.PDF.

City of Rohnert Park. 2009. Sewer Design Standards. Revised July 2009. https://www.rpcity.org/UserFiles/Servers/Server_3037789/File/Engineering/Manual%20of%20Standards/3-26-2010.pdf

City of Rohnert Park. 2012. Emergency Management Plan. Updated for SEMS & NIMS Compliance.

City of Rohnert Park. 2016a. City of Rohnert Park Zoning Map. October 2016. Available at: https://www.rpcity.org/UserFiles/Servers/Server_3037789/File/Planning/Zoning%20Regulations/Zoning%20Diagram%2010-21-16.pdf

City of Rohnert Park. 2016b. Police Services. Accessed August 30, 2019. Available at: https://www.rpcity.org/city_hall/departments/public_safety/police_services .

City of Rohnert Park. 2016c. Fire Services. Accessed August 30, 2019. Available at: https://www.rpcity.org/city_hall/departments/public_safety/fire_services .

City of Rohnert Park. 2016d. Planning Commission Resolution No. 2016-30. Adopted December 22, 2016. Available at: https://www.rpcity.org/common/pages/DisplayFile.aspx?itemId=6911138

City of Rohnert Park. 2016e. 2015 Final Urban Water Management Plan, June 2016. Available at: https://www.rpcity.org/UserFiles/Servers/Server_3037789/File/Engineering/WaterSupplyDocumentation/Final%202015%20Urban%20Water%20Management%20Plan.pdf

City of Rohnert Park. 2016f. Central Rohnert Park Priority Development Plan Final Environmental Impact Report. Certified March 22, 2016. Prepared by AECOM.

City of Rohnert Park. 2017 (August) (originally adopted 2000). *City of Rohnert Park General Plan*. *Our Place . . . Rohnert Park 2020, A Plan for the Future*. Adopted in July 2000; seventh edition printed August 2017. Rohnert Park, California. Prepared by Dyett & Bhatia Urban and Regional Planners.

City of Rohnert Park. 2019a. 2018 Local Hazard Mitigation Plan Review Draft. March 2019. Available at: https://www.rpcity.org/UserFiles/Servers/Server_3037789/File/Planning/Local%20Hazard%20Mitigation%20Plan/LHMP-Full%20Document%20March%202019.pdf

City of Rohnert Park. 2019b. City of Rohnert Park General Plan Diagram. Adopted in November 2000; Revised in June 2019. Available at: http://cityofrohnertpark.hosted.civiclive.com/UserFiles/Servers/Server_3037789/File/Planning/General%20Plan%20and%20Specific%20Plans/General%20Plan%202020/General%20Plan%20Diagram%2004-2019.pdf

City of Santa Rosa. 2017a. 2017 Storm Water Technical Design Manual (LID Manual). Approved May 3, 2017. Available at: https://srcity.org/1255/Low-Impact-Development

City of Santa Rosa. 2017b. Laguna Subregional Water Reclamation System 2017 Annual Report. Available at: https://srcity.org/DocumentCenter/View/15694/Laguna-Subregional-Water-Reclamation-System-2017-Annual-Report?bidId=

City of Santa Rosa. 2016. 2015 Final Urban Water Management Plan. June 2016. https://www.ci.rohnert-park.ca.us/UserFiles/Servers/Server_3037789/File/Engineering/WaterSupplyDocumentation/Final%202015%20Urban%20Water%20Management%20Plan.pdf

CNRA (California Natural Resources Agency). 2009. Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97. December 2009.

DOC. 2005. Special Report 175: Mineral Land Classification of Aggregate Materials in Sonoma County, California.

DOC. 2013. Special Report 205: Update of Mineral Land Classification: Aggregate Materials in the North San Francisco Bay Production-Consumption Region, Sonoma, Napa, Marin, and Southwestern Solano Counties, California.

DOC (Department of Conservation) 2016, Sonoma County Important Farmland Map. Accessed September 2019. Available at: https://www.conservation.ca.gov/dlrp/fmmp/Pages/Sonoma.aspx

DTSC (California Department of Toxic Substances Control). 2017. EnviroStor. Accessed November 2017. http://www.envirostor.dtsc.ca.gov/public/.

FEMA (Federal Emergency Management Agency). 2008. Flood Insurance Rate Maps 06097C0876E and 06097C0877E. Accessed September 10, 2019.

FTA (Federal Transit Administration). 2018. Transit Noise and Vibration Impact Assessment. September 2018. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

IPCC (Intergovernmental Panel on Climate Change). 2014. Climate Change 2014 Synthesis Report: A Report of the Intergovernmental Panel on Climate Change. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Accessed August 2016. http://www.ipcc.ch/report/ar5/syr/.

Morton & Pitalo. 2020. Preliminary Water Study for Rohnert Park Industrial. September 25, 2019. Updated February 25, 2020.

NCRWQCB (North Coast Regional Water Quality Control Board). 2015. California Regional Water Quality Control Board North Coast Region. Adopted on October 8, 2015. Available at: https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2015/151008_0030_phaseIpermitrenewal.pdf

NCRWQCB (North Coast Regional Water Quality Control Board). 2018. Water Quality Control Plan for the North Coast Region. June 2018. Available at: https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/190204/Final%20Basin%20Plan_20180620_lmb.pdf

NRCS (Natural Resources Conservation Service), 2017, Web Soil Survey. Accessed February 2020. Available at: http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx.

OEHHA (Office of Environmental Health Hazard Assessment). 2015. Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments. February 2015.

SCWA (Sonoma County Water Agency). 2013. Groundwater Banking Program Feasibility Study. Prepared by GEI Consultants, Inc., Pueblo Water Resources, and Parker Groundwater. June 2013. Available at: https://evogov.s3.amazonaws.com/185/media/182081.pdf

SCWA (Sonoma County Water Agency). 2019. Draft Flood Management Design Manual. August 2019. Available at: https://www.sonomawater.org/media/PDF/Water%20Resources/Flood%20Protection/Flood%20Management%20Design%20Manual/flood-management-design-manual_Aug2019_ADA.pdf

4.2 List of Preparers

City of Rohnert Park
Jeffrey Beiswenger, Planning Manager

Dudek
Christine Kronenberg, AICP Project Manager
Kevin Locke, Planner
Angelica Chiu, Analyst
Ian McIntire, Air Quality Specialist
Adam Giacinto, Archeologist