

Memorandum

Date: July 29, 2021

To: Tim Shannon, Shannon Masonry Construction, Inc.

From: Philip Ault, Director of Noise and Air Quality

Subject: Addendum Technical Analyses for the Good Onward/3192 Juniper Avenue Project in the City of Santa Rosa, California

This memorandum provides a qualitative comparative analysis of the air quality, greenhouse gas (GHG) emissions, health risk, and noise impacts of the proposed project changes to the impacts identified for the approved Good Onward/3192 Juniper Avenue Project (proposed project).

Certified IS/MND Project Understanding

The proposed project was analyzed under the requirements for the California Environmental Quality Act (CEQA) in an Initial Study/Mitigated Negative Declaration (IS/MND) which was approved by the City of Santa Rosa in January 2021. The proposed project as analyzed in the certified IS/MND proposed to develop a commercial medical cannabis operation on the project site. The proposed project consisted of development of a commercial medical cannabis facility at 3129 Juniper Avenue in the City of Santa Rosa, California. Activities would include manufacturing, indoor cultivation, nursery, and distribution with transportation. The buildout of the proposed project includes improvements to existing buildings on the project site and the construction of a new building. The proposed project would operate 24 hours a day, with the majority of the operations occurring between 8:00 a.m. and 6:00 p.m., 7 days a week. The proposed project would be closed to the public.

Proposed Revised Project Understanding

The project applicant has proposed a project design change to expand the mezzanine level of the new building by 4,950 square feet to provide additional storage area for the facility. This increase in square footage was analyzed by W-Trans in an Addendum Memorandum to the traffic analysis that was prepared for the IS/MND.¹ Using the same trip generation rates that was used for the IS/MND analysis, the additional 4,950 square feet of floor area would result in an average of 25 more trips per day than previously evaluated, including three more trips during each peak-hour. In addition, the proposed revised project would include a total of 54 parking spaces on-site.

¹ W-Trans. 2021. Addendum to the "Updated Focused Traffic Study for the Good Onward Medical Cannabis Project." April 15.

Proposed Revised Project Impact Analysis

The following provides a qualitative comparative analysis of the air quality and GHG emissions, health risk, and noise impacts of the proposed project changes to the impacts identified for the approved project.

Air Quality Emissions Impact Analysis

The following provides a qualitative analysis of the potential air quality emissions impacts of the proposed revised project compared to the impacts identified in the certified IS/MND.

Would the project result in:

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

Summary of the Good Onward/3192 Juniper Avenue IS/MND

The certified IS/MND determined that the proposed project would not preclude extension of a transit line or bike path, propose excessive parking beyond parking requirements, or otherwise create an impediment or disruption to implementation of any Air Quality Plan (AQP) control measures contained in the 2017 Clean Air Plan. The certified IS/MND concluded that the proposed project would support the Bay Area Air Quality Management District (BAAQMD) 2017 Clean Air Plan with implementation of MM AIR-1. Therefore, impacts related to consistency with an AQP would be less than significant with mitigation.

Proposed Revised Project Analysis and Conclusions

Consistent with the certified IS/MND, the proposed revised project would not conflict with the latest 2017 Clean Air Plan planning efforts since construction and operational emissions would be below the BAAQMD thresholds and because the proposed revised project would be within the same project site. The construction of a 4,950 square foot addition to an existing commercial medical cannabis facility and the proposed parking spaces would be consistent with the existing Santa Rosa General Plan land use designation and would have been considered in the 2017 Clean Air Plan. Further, the Addendum to the Traffic Analysis prepared by W-Trans demonstrated that operational Vehicle Miles Traveled (VMT) would still be below the City's threshold and thus not result in a new significant conflict related to operational vehicle emissions.² Therefore, impacts related to consistency with an AQP would be less than significant with implementation of MM AIR-1 of the certified IS/MND. Therefore, the proposed revised project would not result in any new or more severe impacts related to conflicts with implementation of the applicable AQP beyond what was analyzed in the certified IS/MND.

² W-Trans. 2021. Addendum to the "Updated Focused Traffic Study for the Good Onward Medical Cannabis Project." April 15.

- 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?**

Summary of the Good Onward/3192 Juniper Avenue IS/MND

The certified IS/MND determined that construction activities would generate substantial amounts of fugitive dust; however, with incorporation of MM AIR-1, which requires construction and grading activities to incorporate particulate matter reduction measures, the certified IS/MND determined that the BAAQMD's dust abatement requirements would be satisfied. Additionally, the certified IS/MND determined that construction emissions from all construction activities would be well below the recommended thresholds of significance; therefore, construction of the proposed project would have a less than significant impact in regard to emissions of reactive organic gases (ROG), oxides of nitrogen (NO_x), exhaust particulate matter less than 10 microns in diameter (PM₁₀), and exhaust particulate matter less than 2.5 microns in diameter (PM_{2.5}). The certified IS/MND determined that the proposed project would not exceed the carbon monoxide (CO) screening criteria and would have a less than significant impact related to CO. Finally, the certified IS/MND determined that the proposed project would not result in operational-related air pollutants or precursors that would exceed the Bay Area Air Quality Management District (BAAQMD) thresholds of significance.

Therefore, the certified IS/MND concluded that the proposed project would not result in cumulatively considerable net increases in criteria pollutants.

Proposed Revised Project Analysis and Conclusions

Similar to the certified IS/MND, the proposed revised project would generate criteria pollutants during construction and operation. However, due to the small size of the 4,950 square foot addition to an existing commercial medical cannabis facility and five parking spaces, the expected construction emissions would still be below applicable BAAQMD thresholds. As shown in certified IS/MND Tables 2 and 3, the average daily construction emissions of the certified IS/MND would be at most 2.31 pounds/day of ROG, 8.19 pounds/day of NO_x, 0.45 pounds/day of PM₁₀, and 0.42 pounds/day of PM_{2.5}, which are far less than the applicable thresholds. The construction emissions from the proposed revised project 4,950-square-foot addition would not be more than the full sized certified IS/MND project and as a result would not be greater than any of the BAAQMD thresholds. Additionally, the proposed revised project would not increase employment and any operational emissions from mobile vehicles due to employee trips would remain the same. As described in the Addendum to the Traffic Analysis prepared by W-Trans, the marginal increase in floor area would be expected to result in an average of 25 more trips per day than previously evaluated, including three more trips during each peak-hour. However, as shown in Tables 4 and 5 of the certified IS/MND, the full project would result in daily and annual operational emissions less than 1 pound/day, which are far less than the applicable BAAQMD thresholds of 54 and 82 pounds/day. Further, the proposed revised project would still be required to implement air pollution control measures contained in Mitigation Measure (MM) AIR-1 of the certified IS/MND. Consistent with the certified IS/MND, the proposed revised project would not generate substantial amounts of criteria pollutants for which the BAAQMD air basin is under non-attainment.

Therefore, the proposed revised project would not result in any new or more severe impacts related to conflicts with criteria pollutants beyond what was analyzed in the certified IS/MND.

c) Expose sensitive receptors to substantial pollutant concentrations?

Summary of the Good Onward/3192 Juniper Avenue IS/MND

The certified IS/MND addressed the potential impacts to sensitive receptors from toxic air contaminants (TAC) during construction and operation. The certified IS/MND determined the project's construction diesel particulate matter (DPM) emissions would not exceed the BAAQMD's cancer risk threshold of significance at the Maximally Impacted Sensitive Receptor (MIR) would not exceed the BAAQMD's cancer risk, chronic non-cancer hazard index, and annual PM_{2.5} thresholds of significance at the MIR. The certified IS/MND concluded that because nearly all passenger vehicles are gasoline-combusted, the proposed project would not generate significant amounts of DPM emissions during operation. Furthermore, the certified IS/MND determined that cumulative impacts from the project construction and existing sources of TACs would be less than the BAAQMD's cumulative thresholds of significance. Therefore, the certified IS/MND concluded that impacts related to sensitive receptors would be less than significant.

Proposed Revised Project Analysis and Conclusions

The proposed revised project would occur on the same project site within the same footprint and as a result, would not impact new or additional sensitive receptors. Neither construction nor operation of the proposed revised project would result in exceedance of the health risk significance thresholds. As shown in Tables 8 and 9 of the certified IS/MND, construction would not generate DPM emissions that would exceed the BAAQMD's cancer risk threshold at the MIR. The revised proposed project would only increase the interior square footage of the new building. Therefore, emissions associated with the site preparation phase of construction would remain the same as the project analyzed in the certified IS/MND, and only emissions associated with the building construction and interior coating phases of construction would increase. The proposed increase in building square footage is approximately one-fifth the size of the new building analyzed in the certified IS/MND. So, even if it is conservatively assumed that the overall construction emissions (including site preparation phase emissions) all increased by one-fifth, they would still not generate DPM emissions in excess of the BAAQMD's threshold and impacts would be less than significant. Similarly, the proposed revised project would only provide additional storage space for a commercial cannabis operation and would not have any on-site TAC sources and would therefore have a similar less than significant impact.

Furthermore, consistent with the certified IS/MND, the proposed revised project would primarily generate vehicle trips from passenger vehicles due to employees and visitors that would generate an average of 25 more trips per day than previously evaluated, including three more trips during each peak-hour. As a result, because nearly all passenger vehicles are gasoline-combusted, the proposed revised project would not generate significant amounts of DPM emissions during operation and the impact would be less than significant.

Therefore, the proposed revised project would not result in any new or more severe impacts related to exposure of sensitive receptors to substantial pollutant concentrations beyond what was analyzed in the certified IS/MND.

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

Summary of the Good Onward/3192 Juniper Avenue IS/MND

The certified IS/MND determined project construction would not generate significant amounts of odors due to dispersion in the atmosphere and as such would not affect substantial numbers of people. The certified IS/MND found that potential sources of operational odors generated by the proposed project would include plant blossom odors and disposal of miscellaneous commercial refuse. As required by the City's Cannabis Ordinance (Ordinance No. ORD-2017-025), the cultivation of cannabis for commercial use may only be cultivated within a fully enclosed space, and cannabis businesses shall incorporate and maintain adequate odor control measures such that the odors of cannabis cannot be detected from outside of the structure in which the business operates. The certified IS/MND concluded that adherence to existing City regulations would reduce potential operational-source odors and impacts would be less than significant.

Proposed Revised Project Analysis and Conclusions

Similar to the certified IS/MND, the proposed revised project construction activities would not generate significant amounts of odors due to rapid dispersion of diesel exhaust and volatile organic compounds (VOCs) in the atmosphere such that odors would not impact nearby receptors. The proposed revised project would still not include odor generating uses, such as wastewater treatment facilities. Similarly, the proposed revised project would still be required to comply with the City's Cannabis Ordinance and the cultivation of cannabis for commercial use would only be cultivated within a fully enclosed space, and shall incorporate and maintain adequate odor control measures such that the odors of cannabis cannot be detected from outside of the structure. In addition, all project-generated refuse would be removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on-site consistent with City requirements.

Therefore, the proposed revised project would not result in any new or more severe impacts related to conflicts with odors beyond what was analyzed in the certified IS/MND.

Greenhouse Gas Emissions Impact Analysis

The following provides a qualitative analysis of the potential GHG emissions impacts of the proposed revised project compared to the impacts identified in the certified IS/MND.

Would the project result in:

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

Summary of the Good Onward/3192 Juniper Avenue IS/MND

The certified IS/MND determined that the proposed project would generate GHG emissions during temporary (short-term) construction activities such as construction equipment engines, on-site heavy-duty construction vehicles, and motor vehicles used by the construction workers. Also, the certified IS/MND found that long-term, operational GHG emissions would result from project generated vehicular traffic, on-site combustion of natural gas, operation of any landscaping equipment, off-site generation of electrical power over the life of the project, the energy required to convey water to and wastewater from the project site. The certified IS/MND concluded that the proposed project's combined long-term net operational emissions and amortized construction emissions would not exceed the BAAQMD's threshold of 660 metric tons (MT) carbon dioxide equivalent (CO₂e) per year in the year 2030. The certified IS/MND concluded that generation of GHG emissions would not exceed the applicable threshold at project buildout or in the operational year 2030; therefore, impacts would be less than significant.

Proposed Revised Project Analysis and Conclusions

The proposed revised project would result in an expansion of an additional 4,950 square feet of distribution floor area. The proposed revised project would increase the square footage of the new building by less than one-fifth. In addition, the proposed revised project would still employ 10 full-time employees and the expansion would not increase employment. As described in the Addendum to the "Updated Focused Traffic Study for the Good Onward Medical Cannabis Project," the proposed revised project would result in the incremental increase in floor area which would be expected to result in an average of 126 average daily trips, which is an increase of less than one-fourth of the trips estimated under the certified IS/MND.³

The project analyzed under the certified IS/MND was estimated to generate a total of 107.2 MT CO₂e per year from project mobile emissions, and 2.8 MT CO₂e of amortized construction emissions. The BAAQMD threshold is 660 MT CO₂e per year for the year 2030. Therefore, even with an extremely conservative assumption that construction emissions would increase by one-fifth (in relationship to the less than one-fifth increase in square footage of the new building), and that project operational emissions would increase by one-fourth (in relationship to the less than one-fourth increase in projected average daily trips), the overall project emissions would still not exceed applicable thresholds set by the BAAQMD.

³ W-Trans. 2021. Addendum to the "Updated Focused Traffic Study for the Good Onward Medical Cannabis Project." April 15.

As a result, the proposed revised project's long-term operational GHG emission from vehicular generated traffic and operations would still not exceed the BAAQMD's threshold of 660 MT CO₂e per year in the year 2030 because of how small in size the addition would be and that the proposed revised project would not result in additional employees.

Therefore, the proposed revised project would not result in any new or more severe impacts generation of GHG emissions beyond what was analyzed in the certified IS/MND.

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

Summary of the Good Onward/3192 Juniper Avenue IS/MND

The certified IS/MND determined project impacts by comparing them to the Santa Rosa Climate Action Plan (CAP). The certified IS/MND found that the proposed project would include design features that would reduce GHG emissions, such as bicycle parking, compliance with tree preservation ordinances, and providing public and private trees. Further, the certified IS/MND concluded that the proposed project would comply with the California Green Building Standards Code (CALGreen), including requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, and other measures that would reduce GHG emissions. The certified IS/MND concluded the proposed project would be consistent with the applicable local plans, policies, and regulations, and would not conflict with the City's CAP, provisions of Senate Bill (SB) 32, or any other State or regional plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. Therefore, the certified IS/MND found that the proposed project would not conflict with any applicable plan, policy, or regulation adopted to reduce GHG emissions and impacts would be less than significant.

Proposed Revised Project Analysis and Conclusions

The proposed revised project addition of a 4,950-square-foot mezzanine to the proposed new building structure would still be required to comply with the Santa Rosa CAP by including CALGreen design features. Additionally, any requirements related to recycling, waste reduction, and water use would also still be implemented, thus reducing GHG emissions. The new parking areas and paved surfaces would still include public and private trees consistent with the Santa Rosa CAP. As a result, the proposed revised project would be consistent with the applicable local plans, policies, and regulations, and would not conflict with the City's CAP, provisions of SB 32, or any other State or regional plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions.

Therefore, the proposed revised project would not result in any new or more severe impacts related to conflicts with implementation of the Santa Rosa CAP beyond what was analyzed in the certified IS/MND.

Noise Impact Analysis

The following provides a qualitative analysis of the potential noise impacts of the proposed revised project compared to the impacts identified in the certified IS/MND.

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?**

Summary of the Good Onward/3192 Juniper Avenue IS/MND

The certified IS/MND determined that development and land use activities contemplated by the proposed project would not cause a significant increase in ambient noise levels in excess of the noise performance standards defined in the City of Santa Rosa's General Plan and Municipal Code. Worst-case short-term construction noise levels that could occur during the noisiest phase of construction would result in a substantial, but temporary, noise impacts. However, implementation of MM NOI-1, which includes restrictions on permissible hours of construction, would ensure short-term construction activities would be reduced to less than significant.

Proposed Revised Project Analysis and Conclusions

Temporary Construction Noise Increase Impacts

Consistent with the certified IS/MND, the proposed revised project would not create a significant impact. The worst-case noise impacts have already been identified in the certified IS/MND and they would take place outside during the site preparation phase of construction. The certified IS/MND identified that potential temporary noise impact from construction were reduced to less than significant levels with implementation of the identified mitigation measure. The worst-case temporary construction noise impacts for the proposed revised project would be the same as the worst-case noise impacts identified in the certified IS/MND, as the revisions to the proposed project would occur inside the proposed structure and would not create more of an impact than the noise impacts that would occur outside. Therefore, the proposed changes to the project would not contribute to any new short-term construction noise impacts and no additional mitigation is necessary. The proposed revised project would have less than a significant impact with incorporated mitigation.

Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to construction noise beyond what was previously analyzed in the certified IS/MND.

Permanent Operational Noise Increase Impacts

Traffic Noise Impacts

Implementation of the proposed revised project would result in the addition of new parking spaces and a slight increase in the calculated daily trips as compared to the certified IS/MND. A characteristic of noise is that a doubling of sound sources of equal strength is required to result in a perceptible increase (defined to be 3 A-weighted decibel [dBA] or greater) in noise levels. The calculated trips associated with the proposed revised project would be 126 daily trips, compared to 102 daily trips analyzed for the proposed project in the certified IS/MND. This calculated increase of 24 daily trips would not result in a doubling of daily or hourly trips on local roadways in the project vicinity. Therefore, this increase in calculated daily trips would

not result in a perceptible increase in traffic noise levels along any roadway segments in the project vicinity. Therefore, no mitigation is necessary, and there would be a less than significant impact.

Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to traffic noise beyond what was previously analyzed in the certified IS/MND.

Operational/Stationary Source Noise Impacts

The proposed revised project would include the same stationary noise sources such as were previously analyzed in the certified IS/MND, including parking lot activities and exterior mechanical equipment. Potential noise impacts from these stationary noise sources are discussed below.

Parking Lot Activities

The proposed revised project includes 54 parking spaces on the project site. However, the proposed parking spaces would not be any closer to off-site receptors than what was previously analyzed in the certified IS/MND. Thus, the reasonable worst-case parking lot noise levels were already identified in the certified IS/MND. The reasonable worst-case parking lot activity would still be located approximately 220 feet from the nearest off-site sensitive receptor. At this distance, and with the shielding reduction provided by the proposed 8-foot masonry wall that would be constructed along the project borders, parking lot activity would not exceed existing noise levels as measured at the nearest sensitive receptor. Therefore, the noise impact produced by project-related parking lot activities to sensitive off-site receptors would be less than significant.

Mechanical Equipment Operations

Consistent with the certified IS/MND, the proposed revised project changes would not expand or alter any of the proposed mechanical equipment, such as mechanical ventilation systems. The previous analysis provided in the certified IS/MND is accurate for this aspect of the project. Therefore, as demonstrated in the certified IS/MND, noise levels resulting from the operation of mechanical ventilation equipment at the project site would not result in a perceptible increase in ambient noise levels as measured at the nearest sensitive receptor in the project vicinity. The impact of mechanical ventilation equipment operational noise levels on sensitive off-site receptors would be less than significant.

Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to stationary noise sources beyond what was previously analyzed in the certified IS/MND.

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

Summary of the Good Onward/3192 Juniper Avenue IS/MND

A significant impact would occur if vibratory impacts exceeded the Federal Transit Administration (FTA) vibration-related damage threshold. The nearest off-site structure to the project site was identified in the certified IS/MND to be a structure located 45 feet south of the proposed construction footprint

where heavy construction equipment would operate. At this distance, vibratory impact would attenuate to below the industry standard vibration damage criteria for this type of structure. The certified IS/MND found that worst-case short-term vibratory impacts from construction and operational vibratory impacts would be less than significant.

Proposed Revised Project Analysis and Conclusions

Short-term Construction Vibration Impacts

The proposed revised project would not change the construction footprint of the project site, therefore, the closest receptor to the project site would not change from the one identified in the certified IS/MND. As shown in the certified IS/MND, construction-related groundborne vibration impacts to this nearest off-site structure would be less than significant. The analysis in the IS/MND is still accurate for the proposed revised project, and therefore, construction-related groundborne vibration impacts would still be less than significant with implementation of the proposed revised project.

Operational Vibration Impacts

Consistent with the certified IS/MND, the proposed revised project changes (of expanding the mezzanine level of the new building, the additional parking and additional calculated project trips) would not include any new permanent sources of groundborne vibration levels that would be perceptible without instruments by a reasonable person at the property lines of the site, except for vibrations from temporary construction or demolition activities, and motor vehicle operations. The proposed revised project would not result in a substantial increase in heavy-duty vehicle traffic on surrounding roads such that nearby structures may experience perceptible vibration. Therefore, the assessment from the certified IS/MND is still accurate, and the project operational groundborne vibration level impacts would be considered less than significant.

Therefore, the proposed project would not result in any peculiar effects and would not result in new ground borne vibration impacts beyond what was previously analyzed in the certified IS/MND.

- 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?**

Summary of the Good Onward/3192 Juniper Avenue IS/MND

The nearest airport to the project site is located 8 miles away, therefore, there would be no noise impact associated with airport noise. Therefore, the certified IS/MND determined the proposed project would not expose people residing or working in the project area too excessive noise levels associated with public airport noise and there would be no impacts associated with airport noise.

Proposed Revised Project Analysis and Conclusions

The proposed revised project is located at the same site as before and would therefore have the same airport associated noise impact as was identified in the certified IS/MND. Implementation of the proposed revised project would result in no impacts associated with airport noise.

Therefore, the proposed revised project would not result in any peculiar effects and would not result in new or more severe impacts related to airport noise beyond what was analyzed in the certified IS/MND.

Conclusion

As shown in the analysis above, the proposed revised project would not result in any peculiar effects and would not result in new impacts beyond what were previously analyzed in the certified IS/MND.

Sincerely,



Philip Ault, Director of Noise and Air Quality
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