FIRSTCARBONSOLUTIONS™

Final Initial Study/Mitigated Negative Declaration
Good Onward / 3129 Juniper Avenue Project
City of Santa Rosa, Sonoma County, California
State Clearinghouse No. 2020070555

Prepared for:

City of Santa Rosa
Community Development Department
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95407
707.543.3200

Contact: Conor McKay, City Planner

Prepared by:

FirstCarbon Solutions
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597
925.357.2562

Contact: Mary Bean, Project Director
Grant Gruber, Project Manager

Date: December 9, 2020

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SECTION 1: INTRODUCTION

Although not required by the California Environmental Quality Act (CEQA) and CEQA Guidelines, the City of Santa Rosa has evaluated the comments received on the Good Onward / 3129 Juniper Avenue Project Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND). The Responses to Comments and Errata, which are included in this document, together with the Draft IS/MND, Draft IS/MND appendices, and the Mitigation Monitoring and Reporting Program, comprise the Final IS/MND for use by the City of Santa Rosa in its review and consideration of the Good Onward / 3129 Juniper Avenue Project.

This document is organized into three sections:

- **Section 1—Introduction.**
- **Section 2—Responses to Written Comments:** Provides a list of the agencies, organizations, and individuals who commented on the Draft IS/MND. Copies of all of the letters received regarding the Draft IS/MND and responses thereto are included in this section.
- **Section 3—Errata:** This provides minor amendments, clarifications, and corrections to the Draft IS/MND text.

The Final IS/MND includes the following contents:

- Draft IS/MND (provided under separate cover)
- Draft IS/MND appendices (provided under separate cover)
- Responses to Written Comments and Errata (Sections 2 and 3 of this document)
- Mitigation Monitoring and Reporting Program (provided under separate cover)

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SECTION 2: RESPONSES TO WRITTEN COMMENTS

2.1 - List of Authors

A list of public agencies, organizations, and individuals that provided comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be crossed-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Author **Author Code**

State Agencies

North Coast Regional Water Quality Control Board..... RWQCB
California Department of Fish and Wildlife .....CDFW

Private Parties

Allene Cornolo ..... CORNOLO

2.2 - Responses to Comments

2.2.1 - Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of Santa Rosa, as the lead agency, evaluated the comments received on the Final IS/MND for the Good Onward / 3129 Juniper Avenue Project, and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final IS/MND for the proposed project in accordance with CEQA Guidelines Section 15132.

2.2.2 - Comment Letters and Responses

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors.

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From: King, Kaete@Waterboards <Kaete.King@waterboards.ca.gov>
Sent: Wednesday, August 5, 2020 3:12 PM
To: McKay, Conor <CTMcKay@srcity.org>
Cc: Cohen, Sahrye E SPN (Sahrye.E.Cohen@usace.army.mil) <Sahrye.E.Cohen@usace.army.mil>; Day, Melanie@Wildlife <Melanie.Day@wildlife.ca.gov>; Filak, Jordan@Waterboards <Jordan.Filak@Waterboards.ca.gov>; Falcone, Gil@Waterboards <Gil.Falcone@waterboards.ca.gov>
Subject: [EXTERNAL] Good Onward / 3129 Juniper Avenue Project

Hi Conor,

I see that an MND is under review for the Good Onward / 3129 Juniper Avenue Project (SCH 2020070555).

The MND states:

> "Construction of the proposed project has potential to permanently fill the seasonal wetland habitat. In May 2010, the USACE authorized a Section 404 permit (2006-400155-N) to allow the filling of the seasonal wetland on the project site. The North Coast Regional Water Quality Control Board (North Coast RWQCB) issued a Clean Water Act Section 401 water quality certification (WDID No. 1B08123WNSO), with conditions, that certified the project would meet California State water quality standards."

1

The March 23, 2011, water quality certification referenced in this section was for the North Bay Construction Juniper Avenue Residential Project and expired on March 23, 2016. The current project would need to obtain a new certification for the project.

Thanks,

Kaete King
Environmental Scientist
Southern Nonpoint Source and 401 Certification Unit
North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403
(707) 576

The governor of California has issued a statewide shelter in place order due to the COVID-19 emergency. The Water Boards are continuing day-to-day work protecting public health, safety, and the environment. However, most staff are working remotely and we continue to check email and voicemail regularly. Thank you and stay healthy and safe. The best way to reach me is by email. Kaete.king@wtaerboards.ca.gov

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State Agencies

North Coast Regional Water Quality Control Board (RWQCB)

Response to RWQCB-1

The agency referenced a statement on Page 37 of the Draft IS/MND regarding potential impacts to seasonal wetland habitat, which noted that the United States Army Corps of Engineers and RWQCB had previously issued a Section 404 permit and Section 401 water quality certification, respectively. The agency stated that the Section 401 water quality certification expired on March 23, 2016, and the proposed project would need to obtain a new certification.

The purpose of the statement was to note the history of past permits issued by resource agencies. The City of Santa Rosa is in agreement that the applicant will need to obtain a new Section 401 water quality certification.

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

August 28, 2020

Mr. Conor McKay, City Planner
City of Santa Rosa
100 Santa Rosa Avenue, Room 3
Santa Rosa, California 95404
CTMcKay@srcity.org

Subject: Good Onward/3192 Juniper Avenue Project, Initial Study/Mitigated Negative Declaration, SCH No. 2020070555, City of Santa Rosa, Sonoma County

Dear Mr. McKay:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration from the City of Santa Rosa for Good Onward/ 3192 Juniper Avenue Project (Project) pursuant the California Environmental Quality Act (CEQA). The public review period ends on August 31, 2020.

CDFW is therefore submitting comments on the Initial Study/Mitigated Negative Declaration (IS/MND) to inform the City of Santa Rosa, as the Lead Agency, of our concerns regarding potentially significant impacts to sensitive resources associated with the proposed Project. CDFW is providing these comments and recommendations regarding those activities involved in the Project that are within CDFW's area of expertise and relevant to its statutory responsibilities (Fish and Game Code, § 1802), and/or which are required to be approved by CDFW (CEQA Guidelines, §§ 15086, 15096 and 15204). 1

CDFW ROLE

CDFW is a Trustee Agency with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, either

during construction or over the life of the Project. Issuance of a CESA ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA ITP.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c), 21083; CEQA Guidelines, §§ 15380, 15064, and 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code section 2080.

Lake and Streambed Alteration

Pursuant to Business and Professions Code 26060 1(b)(3), every license for cultivation issued by the California Department of Food and Agriculture (CDFA) must comply with Section 1602 of the Fish and Game Code or receive written verification from CDFW that an LSA Agreement is not required. Therefore, for any such activities (including construction for the purpose of cannabis cultivation), the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use or deposit material from a streambed. Based on this notification and other information, CDFW determines whether an LSA Agreement with the applicant is required prior to conducting the proposed activities.

1 CONT

The IS/MND Project Description Section 1.4.7 – Storm Drainage indicates that culverts will be replaced connecting to the drainage on-site. The Project applicant should include this information in an LSA notification for further evaluation by CDFW.

PROJECT DESCRIPTION SUMMARY

Proponent: Good Onward, Inc.

Description and Location:

The project site is located at 3192 Juniper Avenue, in the City of Santa Rosa. It is a 2.05-acre site located on APN 134-072-004. It is surrounded by Juniper Avenue to the West, Pacific Coast Drilling company to the North, a multi-tenant building to the East, and a rural residential property to the South.

2

The Project proponent proposes to develop a commercial medical cannabis operation on the Project site. The applicant proposes to develop the Project in two phases.

Phase 1 involves utilizing the existing buildings, totaling 4,989 square feet. No changes will be made to the exterior of the buildings. Building improvements include installing a perimeter masonry wall and landscaping required for the previously approved contractor's office. Phase 1 cultivation allows up to 5,000 square feet of canopy.

Phase 2 includes the construction of a 20,925-square-foot building on the southeast portion of the site. This new building will allow for expansion of the existing operations on-site. The Phase 2 construction will allow for several cannabis related operations on the site; including manufacturing (9,836 square feet), distribution and manufacturing (3,644 square feet), and indoor cultivation with nursery (expanded up to 12,434 square feet canopy).

2 CONT

Additional features include constructing a new stormwater basin with a 4-inch diameter storm drainpipe, connecting the Basin to a drainage along Juniper Avenue. Culverts associated with the drainage will be replaced.

COMMENTS AND RECOMMENDATIONS

CDFW offers the below comments and recommendations to assist the City of Santa Rosa in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Several special-status species have the potential to occur on the site and will need to be addressed in order to avoid impacts or mitigate for unavoidable species impacts.

3

Rare Plants

Full floristics plant surveys for Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam, were conducted for the site in 2008 and 2017. The results of each survey should be made available for public review, including review by CDFW.

4

Migratory and Nesting Birds

Nesting Birds

MM BIO-1 addresses nesting bird survey parameters for raptors and passerine species. It states that a qualified biologist shall conduct a nesting bird survey no sooner than 14 days prior to start of work and must be repeated if work ceases for longer than 14 days.

Nesting bird surveys for passerines should include two surveys (draft IS/MND states only one survey will be conducted). The first survey should be conducted at least within 7 days prior to the beginning of Project related activities, and an additional survey

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conducted within 48 hours prior to the start of Project related activities. Surveys following this timing will increase the likelihood of detections and avoidance of nesting birds. If there is a lapse of 7 days or longer in Project related activities, another focused survey should be conducted. Additional surveys for raptors may be necessary especially surveys earlier in the nesting season to document early signs of nesting when raptors are more conspicuous.

Additionally, CDFW recommends that a qualified biologist, experienced in raptor behavior, be required to monitor the behavior of any raptors nesting within disturbance distance of Project activities. The qualified biologist should have authority to order the cessation of all Project activities within disturbance distance of any raptor nest if the birds exhibit abnormal nesting behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young). Abnormal nesting behaviors which may cause reproductive harm include but are not limited to: defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, interrupted feeding patterns, and flying away from the nest. Project activities within line of sight of the nest should not resume until the qualified biologist has consulted with CDFW and both the qualified biologist and CDFW confirm that the bird's behavior has normalized, or the young have left the nest. 5 CONT

Tree Removal

MM BIO-7 says that "the applicant shall plant replacement trees required by the permit by the time of project occupancy".

CDFW recommends that a figure be included showing the location and species of each trees that will be removed in relation to habitat types. Whether a tree is native or non-native/invasive would affect the recommended mitigation ratio for tree replacement. Native trees should be replaced at a greater ratio than nonnative/invasive trees. California native species removed from the site should be replaced at a minimum ratio of 3:1 (replacement: removal), whereas nonnative trees may be replaced at a 1:1 ratio. Large-diameter Heritage Trees found on the site (primarily native oaks) are expected to provide food and shelter for a variety of native species. Additionally, it would take many years for planted oaks to get to a size that could provide the same ecological benefits that old, native trees provide. The Project should use a minimum mitigation ratio of 6:1 for oaks removed from the site. 6

Other Considerations

Fencing Hazards

The Project may result in the use of open pipes used as fence posts, property line stakes, signs, etc. CDFW recommends that all hollow posts and pipes be capped to prevent wildlife entrapment and mortality because these structures mimic the natural 7

cavities preferred by various bird species and other wildlife for shelter, nesting, and roosting. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality. Metal fence stakes used on the Project site should be plugged with bolts or other plugging materials to avoid this hazard. Further information on this subject may be found at: https://ca.audubon.org/conservation/protect-birds-danger-open-pipes. 7 CONT

Pest Control

As stated on pages 63 and 64 of the IS/MND, “Project construction and operations would involve the minor routine transport and handling of minimal quantities of hazardous substances such as diesel fuels, lubricants, solvents, asphalt, pesticides, and fertilizers.”

Use of rodenticides at the construction site and cannabis facility should be prohibited. Use of pesticides or rodenticides is also not recommended in areas where raptors are foraging, breeding, or nesting. Second-generation rodenticides such as brodifacoum are used widely in the United States to kill rats and other rodents. Unfortunately, they also kill many raptors, which are attracted to the poisoned rodents as they are in their final stages of death (O’Hare et al. 2013). 8

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDB. The CNNDB field survey form can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data#44524420-pdf-field-survey-form. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. 9

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs., tit. 14, § 753.5; Fish and Game Code, § 711.4; Pub. Resources Code, § 21089). 10

CONCLUSION

CDFW appreciates the opportunity to comment on the IS/MND to assist the City of Santa Rosa in identifying and mitigating Project impacts on biological resources.

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Questions regarding this letter or further coordination should be directed to Ms. Mia Bianchi, Environmental Scientist, at (707) 428-2068 or Mia.Bianchi@wildlife.ca.gov; or Ms. Randi Adair, Senior Environmental Scientist (Supervisory). at (707) 576-2786 or Randi.Adair@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Gregg Erickson
BE74D4C93C604EA...

Gregg Erickson
Regional Manager
Bay Delta Region

REFERENCES

O'Hare, M., Sanchez, D. L., & Alstone, P. (2013). Environmental risks and opportunities in cannabis cultivation. BOETC Analysis Corp. University of California, Berkeley, CA, USA.

Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: Good Onward/3192 Juniper Avenue Project, City of Santa Rosa

SCH No.: 2020070555

RECOMMENDED MITIGATION MEASURES	Responsibility for Implementation
BIO-1 **Breeding bird pre-construction surveys** • Nesting bird surveys for passerines should include two surveys (Draft IS/MND states only one survey will be conducted). The first survey should be conducted at least **within 7 days** prior to the beginning of Project related activities, and an additional survey conducted within **48 hours** prior to the start of Project related activities. If there is a lapse of 7 days or longer in Project related activities, another focused survey should be conducted. Additional surveys for raptors may be necessary especially surveys earlier in the nesting season to document early signs of nesting when raptors are more conspicuous. • A qualified biologist, experienced in raptor behavior, should be required to monitor the behavior of any raptors nesting within disturbance distance of Project activities. The qualified biologist should have authority to order the cessation of all Project activities within disturbance distance of any raptor nest if the birds exhibit abnormal nesting behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young).	Project Applicant/Qualified Biologist

12

BIO-7 **Mitigation Measure: Tree Removal and Replacement** • CDFW recommends that a figure be included showing the location and species of each trees that will be removed in relation to habitat types. Whether a tree is native or non-native/ invasive would affect the recommended mitigation ratio for tree replacement. Native trees should be replaced at a greater ratio than nonnative/ invasive trees. California native species removed from the site should be replaced at a minimum ratio of 3:1 (replacement: removal), whereas nonnative trees may be replaced at a 1:1 ratio. Large-diameter Heritage Trees found on the site (primarily native oaks) are expected to provide food and shelter for a variety of native species. Additionally, it would take many years for planted oaks to get to a size that could provide the same ecological benefits that old, native trees provide. The project should use a minimum mitigation ratio of 6:1 for oaks removed from the site.	Project Applicant/Qualified Biologist

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CONT

California Department of Fish and Wildlife (CDFW)

Response to CDFW-1
The agency provided background information about its regulatory responsibilities. No response is necessary.

Response to CDFW-2
The agency provided a project summary. No response is necessary.

Response to CDFW-3
The agency provided introductory remarks to preface its comments. No response is necessary.

Response to CDFW-4
The agency noted that full floristics plant surveys for Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam were conducted for the project site in 2008 and 2017 and stated that these surveys should made available for public review.

WRA prepared a Biological Resources Assessment in December 2017, which was provided as Appendix B to the Draft IS/MND. The 2017 plant survey was contained within this document, which was circulated for public review in conjunction with the Draft IS/MND.

The 2008 plant survey is attached as Appendix E.

Response to CDFW-5
The agency cited Mitigation Measure BIO-1, which requires nesting bird surveys prior to vegetation removal, and stated that two surveys should be conducted, the first within 7 days of project activities removal and the second within 48 hours of project activities. The agency also described the desired qualifications of the Biologist who would conduct the surveys.

The text of Mitigation Measures BIO-1 and BIO-2 have been revised in accordance with CDFW's proposed edits in Attachment A. The revised text is shown in Section 3, Errata, of this Final ISMND.

Response to CDFW-6
The agency referenced Mitigation Measure BIO-7, which concerns planting of replacement trees, and recommended that a figure be included showing the location and species of each tree proposed for removal. The agency recommended that native tree species be replaced at 3:1 ratio and nonnative tree species be replaced at a 1:1 ratio.

Only one mature tree is anticipated to be removed. This tree is located in the southern portion of the site where the proposed warehouse would be developed in Phase 2.

Mitigation Measure BIO-7 requires compliance with Santa Rosa Zoning Ordinance Section 17-24.030 including any replacement ratio requirements. The Zoning Ordinance affords City staff discretion to determine the appropriate replacement ratio, which may occur at the ratios recommended by CDFW.

Response to CDFW-7
The agency stated that the proposed project may result in the use of open pipes uses as fence posts, property line stakes, and signs. The agency recommended that hollow pipes be capped to prevent wildlife entrapment.

As disclosed on Draft IS/MND Page 4, a combination concrete wall/chain link fence would be constructed around the perimeter of the project site. The wall/fence would employ capped fence posts.

Response to CDFW-8
The agency referenced the discussion of routine use of pesticides on Draft IS/MND Page 64 and stated that rodenticides should be prohibited because of the potential to kill raptors.

The biological resources analysis found no evidence of rodent infestation at the project site. In regard to future use of rodenticides as part of operation of the cannabis facility, a clarifying sentence is added to the ISMND to identify the preference for traps over rodenticides should rodent control become necessary.

Response to CDFW-9
The agency provided standard language about posting environmental information to a database. No response is necessary.

Response to CDFW-10
The agency provided standard language about Notice of Determination filing fees. No response is necessary.

Response to CDFW-11
The agency provided closing remarks. No response is necessary.

Response to CDFW-12
The agency attached a recommended Mitigation Monitoring and Reporting Program with edits to Mitigation Measures BIO-1 and BIO-7. Refer to Response to CDFW-5 and Response to CDFW-6.

From: jandacornolo@aol.com <jandacornolo@aol.com>
Sent: Sunday, August 16, 2020 8:24 AM
To: McKay, Conor <CTMcKay@srcity.org>
Subject: [EXTERNAL] Good Onward, Inc. Cannabis Facility

I am writing because I think having this cannabis facility on Juniper Av. is a mistake. We have had property on Juniper ()previously South Dutton) since the late 1929. This is a very narrow country road. It barely has room for two cars to pass in a few spots. What is this unnecessary business going to do to the people living on the street. Will everyone have to stay inside because of the obnoxious smell of the cannabis? What about the two schools in such close proximity? This is another move by our local officials to grab onto anything that will raise more money so they can waste it on their unnecessary projects.
Allene Cornolo

1

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Private Parties

Allene Cornolo (CORNOLO)

Response to CORNOLO-1

The author objected to the proposed project on land use compatibility grounds. The author cited traffic, odors, and potential conflicts with nearby schools as issues of concern.

The Draft IS/MND evaluated potential impacts associated with traffic, odors, and schools. The conclusions are summarized as follows:

- **Traffic** (Draft IS/MND Pages 84-87): The proposed project would generate 15 AM peak hour trips and 13 PM peak hour trips, a *de minimis* amount of new traffic that would not cause a significant deterioration in the performance of either Juniper Avenue or Bellevue Avenue. Furthermore, Mitigation Measure TRANS-1 requires the applicant to install half-width improvements along the project frontage with Juniper Avenue prior to occupancy of Phase 2 to ensure that safe ingress and egress can occur. For these reasons, the IS/MND concluded that traffic impacts would be less than significant.
- **Odors** (Draft IS/MND Pages 3 and 32-33): Cannabis cultivation, manufacturing, and processing activities would occur indoors in accordance with the City of Santa Rosa's Cannabis Ordinance. All buildings would be required to comply with applicable California Building Standards Code for ventilation. For these reasons, the IS/MND concluded that odor impacts would be less than significant.
- **Schools** (Draft IS/MND Page 46): The nearest school to the project site is Bellevue Elementary School, located approximately 0.46 mile (2,429 feet) to the southeast. The distance is sufficiently far such that any construction or operational activities that occur on-site would not impact the school. Furthermore, the proposed project would not be open to the public and would employ security measures such as a combination concrete wall/chain link fence and video surveillance. For these reasons, the IS/MND concluded that school impacts would be less than significant.

In sum, the Draft IS/MND provided substantial evidence that the proposed project would not create any land use compatibility conflicts with neighboring land uses.

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SECTION 3: ERRATA

The following are revisions to the Draft IS/MND for the Good Onward/3192 Juniper Avenue Project.

These revisions are minor modifications and clarifications to the document, and do not change the significance of any of the environmental issue conclusions within the Draft IS/MND. The revisions are listed by page number. All additions to the text are underlined (underlined) and all deletions from the text are stricken (~~stricken~~).

3.1 - Draft IS/MND Text Changes

The following are revisions to the Draft IS/MND analysis and mitigation measures for the Good Onward/3192 Juniper Avenue Project, to correct an inadvertent error regarding the timing of the purchase of conservation credit, and to provide equal or more effective mitigation at the request of CDFW.

Biological Resources

Page 37

The following correction is made to the text under checklist question a), to correct an inadvertent error regarding the timing of the purchase of conservation credits:

~~The Applicant purchased 1.03 acres of CTS habitat conservation credits at the Hazel Mitigation Bank and 0.03 acres of CTS habitat conservation credits at the Swift/Turner Conservation Bank, for a combined total of 1.06 acres of CTS habitat conservation credits.~~

The compensatory mitigation measures are effective at reducing impacts to CTS by enabling the in-perpetuity conservation of larger areas of actually occupied and suitable CTS habitat at an agency approved mitigation bank, or the creation of suitable habitat on-site. ~~the Hazel Mitigation Bank and the Swift/Turner Conservation Bank~~ Additionally, implementing the avoidance and minimization measures stated below, including biological construction monitoring and stop-work order requirements, will decrease the probability of take of potentially present individuals of CTS, thus effectively reducing potential project-related impacts to the CTS population.

Therefore, with implementation of Mitigation Measures BIO-1 through BIO-5 (including the purchase of compensatory mitigation credits), potential project-related impacts will be reduced to less-than-significant. ~~as determined by the USFWS Programmatic Biological Opinion 81420-2008-F-1787, and CDFW Consistency Determination 2080-2010-046-03.~~

The following correction is made to the text under checklist question b), to correct an inadvertent error regarding the timing of the purchase of conservation credits:

Construction of the proposed project has potential to permanently fill the seasonal wetland habitat. As such, the USFWS requires mitigation for loss of potential suitable habitat according to the

Conservation Strategy and Programmatic Biological Opinion even though it is unlikely that the species are or will ever be present.

~~In May 2010, the USACE authorized a Section 404 permit (2006-400155-N) to allow the filling of the seasonal wetland on the project site. The North Coast Regional Water Quality Control Board (North Coast RWQCB) issued a Clean Water Act Section 401 water quality certification (WDID No. 1B08123WNSO), with conditions, that certified the project would meet California State water quality standards.~~

~~The Applicant purchased 0.05 acre of wetland creation credits from the Hazel Mitigation Bank and 0.03 acres of combined Sebastopol Meadowfoam/CTS habitat establishment and preservation credits at the Swift/Turner Conservation Bank.~~

The compensatory mitigation measures are effective at reducing impacts to potential project-related impacts to seasonal wetland function and perseverance by enabling the creation, establishment, and in-perpetuity preservation of agency-approved suitable mitigation habitat. ~~a larger area of robust and valuable seasonal wetland habitat Hazel Mitigation Bank and the Swift/Turner Conservation Bank.~~

Therefore, project-related impacts to state and federally protected wetlands will be reduced to less than significant.

The following correction is made to the text under checklist question f), to correct an inadvertent error regarding the timing of the purchase of conservation credits:

The project site is located within the Santa Rosa Plain, an ecoregion which supports habitat for several vernal pool-associated special-status species. The USFWS developed the Santa Rosa Plain Conservation Strategy as a conservation plan for these species. The Santa Rosa Plain Conservation Strategy Area is an area established by the USFWS for the protection and continued existence of California tiger salamander and three endangered plant species: Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam. The Conservation Strategy outlines the specific species of concern for this area along with guidance for specific conservation measures. In 2007 the USACE consulted with the USFWS on Section 404 permitting within the Conservation Strategy area which resulted in a Programmatic Biological Opinion. This 2007 Programmatic Biological Opinion outlines the mitigation requirements resulting from impacts to wetlands and associated impacts to California tiger salamander and the three listed plants and can be appended to permits authorized by the USACE. The Programmatic Biological Opinion outlines the compensatory mitigation and habitat conservation requirements for California tiger salamander and the three listed plant species.

~~The Applicant purchased 0.05 acres of wetland creation credits from the Hazel Mitigation Bank and 0.03 acres of combined Sebastopol Meadowfoam/CTS habitat establishment and preservation credits at the Swift/Turner Conservation Bank.~~

The compensatory mitigation measures are effective at reducing impacts to potential project-related impacts to seasonal wetland function and perseverance by enabling the creation, establishment, and

in-perpetuity preservation of agency-approved suitable mitigation habitat. ~~a larger area of robust and valuable seasonal wetland habitat Hazel Mitigation Bank and the Swift/Turner Conservation Bank.~~

Therefore, impacts associated with conflicts with conservation plans would be reduced to less than significant.

Page 40, Mitigation Measure BIO-1

Mitigation Measure BIO-1 has been amended to reflect comments from the California Department of Fish and Wildlife.

MM BIO-1 If vegetation removal occurs during the breeding season (February 1 to August 31), a qualified Biologist shall conduct nesting bird surveys to determine if any active nests are present and establish a no-work buffer zone around the nest until young have fledged or the nest is no longer active. The first survey should be conducted at least within 7 days prior to the beginning of construction activities, and an additional survey conducted within 48 hours prior to the start of construction activities. If there is a lapse of 7 days or longer in construction activities, another focused survey should be conducted. Additional surveys for raptors may be necessary especially surveys earlier in the nesting season to document early signs of nesting when raptors are more conspicuous. Once a nest is no longer active, work may be conducted without restriction within the buffer zone. This mitigation measure does not apply if vegetation removal occurs outside the breeding season (September 1 to January 31). ~~If vegetation removal occurs during the breeding season (February 1 to August 31), a qualified biologist shall conduct a nesting bird survey to determine if any active nests are present and establish a no-work buffer zone around the nest until young have fledged or the nest is no longer active. The survey shall be conducted no sooner than 14 days prior to start of work and must be repeated if work ceases for longer than 14 days during the breeding bird season. Once a nest is no longer active, work may be conducted without restriction within the buffer zone. This mitigation measure does not apply if vegetation removal occurs outside the breeding season (September 1 to January 31).~~

Pages 40 and 41, Mitigation Measure BIO-2

Mitigation Measure BIO-2 has been amended to reflect comments from the California Department of Fish and Wildlife.

MM BIO-2 A qualified Biologist, experienced in raptor behavior, should be required to monitor the behavior of any raptors nesting within disturbance distance of Project activities. The qualified Biologist should have authority to order the cessation of all Project activities within disturbance distance of any raptor nest if the birds exhibit abnormal nesting behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young). ~~A pre-construction survey for ground-nesting birds shall be performed within 30 days prior to the start of construction. A qualified avian biologist shall conduct passerine nest surveys prior to tree pruning, tree removal,~~

~~ground-disturbing activities, or construction activities at the project site to locate any active nests on or adjacent to the project site. However, if land-clearing activities can be performed outside of the nesting season, that is, between August 16 and January 31, no preconstruction surveys for nesting birds are warranted.~~

~~Pre-construction surveys will be conducted no more than thirty (30) days prior to the start of construction or ground disturbing activities if the activities occur during the nesting season (generally ranging from February 1 to August 15). Preconstruction surveys will be repeated at 30-day intervals until construction has started. Active nests will be identified, located, and described and protective measures will be implemented. Protective measures will include establishment of clearly delineated (i.e., Visi-barrier, orange construction fencing) exclusion zones around each nest site. Exclusion zone size shall be determined by a qualified biologist depending on species and disturbance level, following typically accepted standards (e.g., 15 to 50 feet for Allen's Hummingbird, depending on disturbance level). The active nest sites within exclusion zones will be monitored by a qualified biologist on a weekly basis throughout the nesting season to identify any signs of disturbance or nest abandonment. The barriers marking exclusion zones will remain in place until the young have left the nest and are foraging independently or if the nest is no longer active.~~

The following edits are made to MM BIO-3 to require purchase of conservation credits to compensate for the loss of CTS habitat through project implementation. These edits are equally or more effective than what appeared in the Draft ISMND, and the applicant has agreed to these measures.

MM BIO-3 To compensate for the loss of ~~0.016 acre of~~ potential CTS habitat, the Applicant shall purchase ~~1.03 acres of~~ CTS habitat conservation credits at an agency-approved mitigation bank or create suitable mitigation habitat on-site, ~~the Hazel Mitigation Bank and/or 0.03 acres of CTS habitat conservation credits at the Swift/Turner Conservation Bank,~~ in accordance with the requirements of the Santa Rosa Plain Conservation Strategy. ~~for a combined total of 1.06 acres of CTS habitat conservation credits.~~

MM BIO-5 To compensate for the loss of ~~0.016 acres of~~ potentially suitable but not occupied habitat for Sebastopol meadowfoam, Sonoma sunshine, and Burke's goldfields, the applicant shall either create suitable habitat onsite, or purchase ~~0.05 acres of~~ wetland creation credits from an agency-approved mitigation bank, ~~the Hazel Mitigation Bank, 0.03 acres of combined~~ and shall also purchase Sebastopol Meadowfoam/CTS habitat establishment and preservation credits at an agency-approved mitigation bank. ~~the Swift/Turner Conservation Bank.~~

~~This mitigation for impacts to suitable habitat for the endangered plants exceeds the 1.5:1 mitigation ratio following the prescriptions in the Santa Rosa Plain Conservation Strategy Programmatic Biological Opinion~~.

Hazardous Materials

Pages 63-64

Text is added to reflect comments from the California Department of Fish and Wildlife regarding the use of rodenticides.

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

Less than significant impact. The project site would be used to develop a commercial cannabis operation on the project site. Activities would include manufacturing, indoor cultivation, nursery, and distribution with transportation. Project construction and operations would involve the minor routine transport and handling of minimal quantities of hazardous substances such as diesel fuels, lubricants, solvents, asphalt, pesticides, and fertilizers. Handling and transportation of these materials could result in the exposure of workers or residents, to hazardous materials. However, the project would not create a significant hazard to the public or the environment, because project construction and operations would comply with applicable federal, State, and local laws pertaining to the safe handling and transport of hazardous materials. **The project would be required to comply with all applicable federal, State, and local laws, governing pesticides, fungicides, and rodenticides, including but not limited to, label instructions regarding the proper use and storage of such chemicals as identified by the California Department of Pesticide Regulation. When feasible, the applicant should avoid the use of rodenticides in favor of traps, should rodent control become necessary.**

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Appendix E:
Rare Plant Survey

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Protocol Surveys for Rare Plants - 2006 and 2007

3192 JUNIPER AVENUE PROJECT
SANTA ROSA, SONOMA COUNTY
CALIFORNIA

Prepared For:
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Date:
October 2007

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1.0 INTRODUCTION

This report presents the results of special status plant surveys conducted on the 3192 Juniper Avenue Project site (Study Area) located at 3192 Juniper Avenue, Santa Rosa, Sonoma County, California (Figure 1). The purpose of the study was to identify the location and presence of potentially occurring sensitive plant species, if any. Focused special status plant surveys within the Study Area were conducted by a WRA botanist on March 31, May 5, and May 23, 2006 and March 22, April 19, and May 17, 2007 (with follow up visits on March 6, April 1, and May 6, 2008). These dates coincided with peak blooming periods of 21 of 28 potentially occurring special status species. None of these 28 special status plant species were located during the surveys, including the four listed endangered species [Sonoma sunshine (*Blennosperma bakeri*), Burke's goldfields (*Lasthenia burkei*), Sebastopol meadowfoam (*Limnanthes vinculans*), and many-flowered navarretia (*Navarretia leucocephala ssp. plienantha*)] that can be found in seasonal wetlands and vernal pools of the Santa Rosa Plain.

1.1 Study Area Description

The Study Area covers 2.1 acres, is relatively level, and the elevation of the area is approximately 100 feet (32 to 34 meters) above sea level. Historically, the Study Area was probably used for livestock grazing or other agricultural uses. Today the site is mostly developed with several buildings used for offices, storage, and one residential home. Portions are paved or graveled roadways, and a portion has been developed as an above ground leach field. Vegetation on the site is dominated by non-native annual grassland characterized by annual grasses and herbaceous forb species with ornamental shrubs and trees. There is one area that meets the criteria of seasonal wetland, consisting of a shallow depression.

1.1.1 Vegetation

The dominant plant community within the Study Area that is not existing development is non-native annual grassland. A small area covering approximately 696 square feet includes plants consistent with seasonal wetland habitat. The observed plant communities are discussed in detail below.

<u>Non-native Annual Grassland</u>
The non-native annual grassland in the Study Area includes wild oat (*Avena* sp.), brome grasses (*Bromus spp.*), barleys (*Hordeum* spp.), wild radish (*Raphanus sativus*), bur clover (*Medicago polymorpha*), and spring vetch (*Vicia sativa*).

<u>Seasonal Wetland</u>
Plants commonly found in seasonal wetland plant community habitat are within a subtle topographic depression that covers approximately 696 square feet. The plants within this area include Italian ryegrass (*Lolium multiflorum*), meadow barley (*Hordeum brachyantherum*), Mediterranean barley (*H. marinum* ssp. *gussoneanum*), annual bluegrass (*Poa annua*), and semaphore grass (*Pleuropogon californicus*).

1.1.2 Soils

The Sonoma County Soil Survey (USDA 1972) indicates that the Study Area has two native soil

types: Clear Lake clay, ponded, 0 to 2 percent slopes and Wright loam, wet, 0 to 2 percent slopes. These soil types are described in detail below:

Clear Lake clay, ponded, 0 to 2 percent slopes. The Clear Lake series consists of clays that formed under poorly drained conditions. These soils are underlain by alluvium from basic and sedimentary rock. This soil is in basin-like areas and is subject to temporary ponding. In a typical profile, the first eight inches are dark gray (N 4/0) clay or very dark gray (10YR 3/1). The next 17 inches are dark gray (N 4/0) or black (10YR 2/1) clay. This soil has hydric components.

Wright loam, wet, 0 to 2 percent slopes. The Wright series consists of somewhat poorly drained and moderately well drained loams that have a clay subsoil. They are underlain by old valley plain alluvium of mixed origin such as volcanic and marine sediment. In a representative profile, the first 15 inches are light brownish-gray (10YR 6/2) loam that has common, medium, very dark grayish brown mottles (10YR 3/2). The next 15 to 25 inches are light brownish gray (10YR 6/2) and light gray (10YR 7/2) sandy clay loam that has a few, fine, yellowish brown or dark grayish brown mottles (10YR 4/2). This soil contains two hydric inclusions, unnamed and Clear Lake.

2.0 METHODS

2.1 Background Data

Rare plants are defined here to include: (1) all plants that are federal- or state-listed as rare, threatened or endangered, (2) all federal and state candidates for listing, (3) all plants included in Lists 1 through 3 of the CNPS Inventory (CNPS 2007), and (4) plants that qualify under the definition of "rare" in the California Environmental Quality Act, section 15380.

A background information search was conducted to identify potential rare plant species that may occur in the Study Area vicinity. A table of these species, and their protection status, habitat requirements, and likelihood to occur in the Study Area is provided in Appendix A. Sources for this
search included records from the California Department of Fish and Game (CDFG) Natural Diversity Database (CDFG 2007) and the California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California (CNPS 2007) for the USGS Healdsburg, Sebastopol, Camp Meeker, Mount St. Helena, Mark West Springs, Santa Rosa, Jimtown, Geyserville, and Guerneville quadrangles. There are no records of listed plants occurring in the Study Area.

2.2 Field Survey

Field surveys were conducted on March 31, May 5, and May 23, 2006 and March 22, April 19, and May 17, 2007 (with follow up visits on March 6, April 1, and May 6, 2008). These survey dates corresponded to peak blooming periods for the listed endangered plant species and many of the others with potential to occur within the Study Area. The field surveys were conducted by botanists who have experience with the rare plant species that could occur in the area. All plants were identified using The Jepson Manual (Hickman 1993), to the taxonomic level necessary to determine whether or not they were rare. A list of observed plant species is provided in Appendix B.

Because the Study Area is within the Santa Rosa Geographic Plain, these surveys targeted the listed species often associated with seasonal wetlands on the Santa Rosa plain and followed the protocol outlined in the "Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain" (USFWS 1996b). This protocol was drafted for the four federally listed species that occur within the Santa Rosa Plain: Sonoma sunshine (*Blennosperma bakeri*), Burke's goldfields (*Lasthenia burkei*), Sebastopol meadowfoam (*Limnanthes vinculans*), and many-flowered navarretia (*Navarretia leucocephala ssp. plienantha*). The surveys were scheduled to correspond to the blooming periods of these species.

The guidelines specify the use of local reference sites, so two reference sites were visited on the dates of the surveys. One reference site with known populations of Burke's goldfields is located near the intersection of Starr Road and Old Redwood Highway, approximately 4 miles north of the Study Area. Another reference site containing populations of Sonoma sunshine, Burke's goldfields, and Sebastopol meadowfoam is a complex of vernal pools on private property along Alton Lane off Fulton Road, approximately 3 miles north of the Study Area. There is no known, publicly accessible reference site location for many-flowered navarretia within the Santa Rosa Geographic Plain. Table 1 summarizes which species were observed blooming at one or both reference site on which of the survey dates.

Table 1. Observed blooming of the four federally-listed Santa Rosa Plain species at the reference sites. (● = species was observed blooming at one or both of the reference sites on the date of the survey).

	31 March 2006	5 May 2006	23 May 2006	22 March 2007	19 April 2007	17 May 2007
Sonoma sunshine	●	●		●	●	
Burke's goldfields		●	●		●	●
Sebastopol meadowfoam		●	●		●	
many-flowered navarretia			assumed			assumed

3.0 RESULTS

3.1 Background Data Search Results

Based upon a review of CNDDB (CDFG 2007) and CNPS Electronic Inventory (CNPS 2007) records, it was initially determined that 28 special status plant species had potential to occur, based on specific habitat requirements, in the vicinity of the Study Area (Appendix A).

3.2 Field Survey Results

Thirty-four plant species were observed within the Study Area (Appendix B) during the rare plant surveys conducted on the three survey dates in two consecutive years . None of the rare species listed in Appendix A were detected during these surveys, including the listed endangered plant species often associated with seasonal wetlands on the Santa Rosa plain.

4.0 CONCLUSIONS

No special-status plant species were found on the Study Area during the rare plant surveys conducted in 2006 and again in 2007 (with follow up visits on March 6, April 1, and May 6, 2008). These surveys coincided with peak blooming periods for 22 of the 31 potentially occurring special status plant species, including all three of the listed endangered plants for the Santa Rosa Plain. No rare plants are expected to occur in the Study Area because of existing development and land use, past agricultural disturbance, and the relatively small size and isolation of the Study Area.

5.0 REFERENCES

California Department of Fish and Game (CDFG). 2007. Natural Diversity Database, Wildlife and Habitat Data Analysis Branch. Sacramento.

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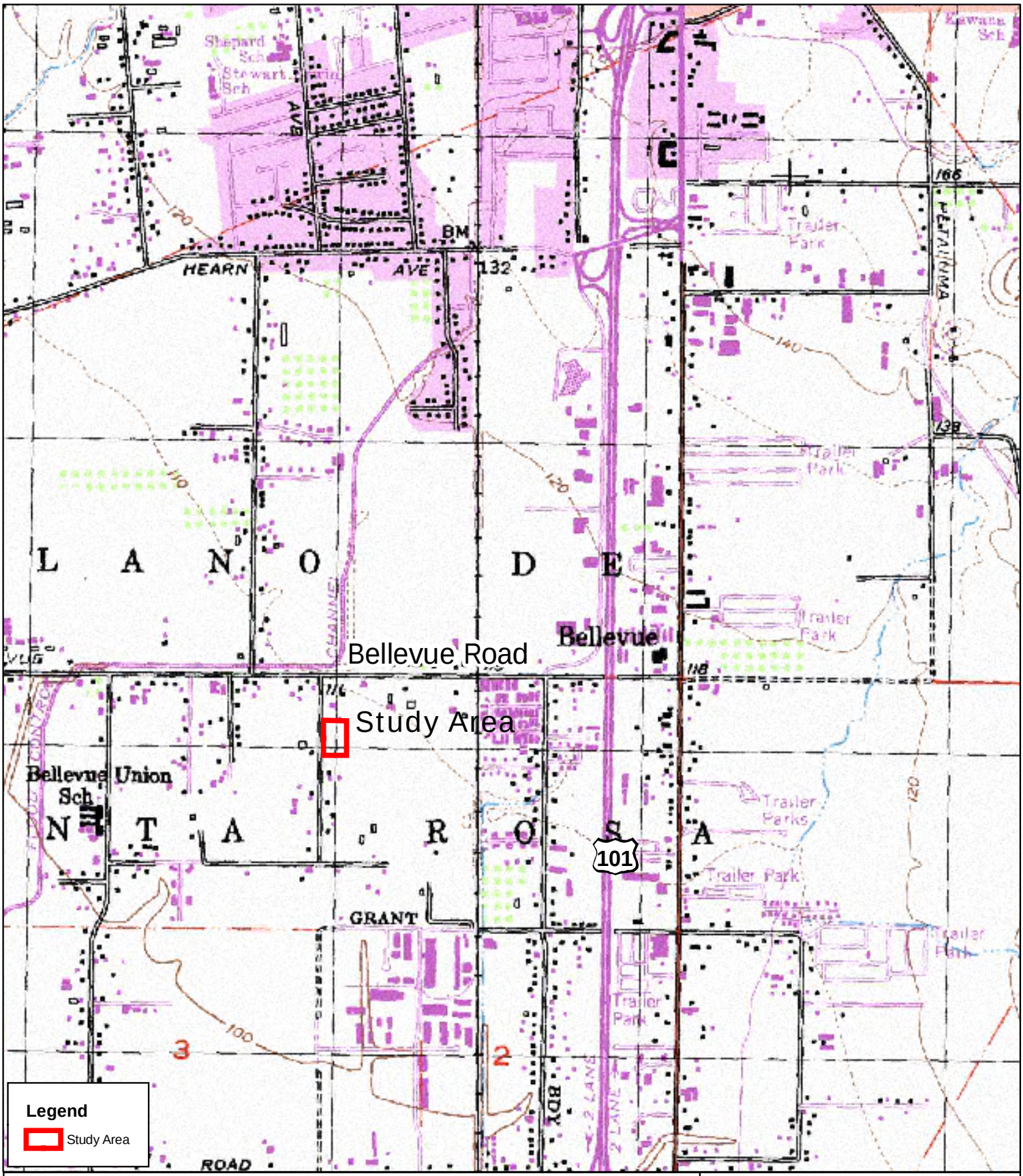

Figure 1. Location Map of the 3192 Juniper Ave. Project.

Santa Rosa, California

0 1,500 3,000 Feet

wra
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Date: February 2006
Basemap: USGS Topo Quad
Map By: Sundaran Gillespie
Filepath: I:\Acad 2000\15000\15179\gis\ArcMap\Figure 1.mxd

APPENDICES

Appendix A - Special Status Plant Species Potentially Present in Study Area

Appendix A. Special status plant species that may occur, or are known to occur in habitats similar to those found in the Study Area. Plant list compiled from search of California Department of Fish and Game Natural Diversity Database (CNDDB 2008) and the California Native Plant Society (CNPS) Electronic Inventory for the Healdsburg, Sebastopol, Camp Meeker, Mount St. Helena, Mark West Springs, Santa Rosa, Jimtown, Geyserville, and Guerneville USGS quadrangles. Species that occur in habitats or at elevations that are not available within the Study Area are not included.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL FOR OCCURRENCE
Alopecurus aequalis var. *sonomensis* Sonoma alopecurus	FE, List 1B	Freshwater marshes and swamps, riparian scrub. Wet areas, marshes, and riparian banks with other wetland species; elevation 5-360m. Blooms May-July.	**Not present.** Species not observed during 2006 and 2007 surveys.
Astragalus claranus Clara Hunt's milk-vetch	FE	Cismontane woodland, valley and foothill grassland, chaparral. Endemic to Napa and Sonoma Counties. Open grassy hillsides, especially on exposed shoulders in thin volcanic clay soil moist in spring. 75-235 m. Blooms March-June.	**Unlikely.** Suitable hillside habitat with thin soil not present in Project Area. Species not observed during plant surveys. No further surveys are recommended.
Balsamorhiza macrolepis var. *macrolepis* big-scale balsamroot	List 1B	Valley and foothill grassland, cismontane woodland. Sometimes on serpentine; elevation 35-1000m. Blooms March-June.	**Not present.** Species not observed during 2006 and 2007 surveys.
Blennosperma bakeri Sonoma sunshine	FE, SE, List 1B	Mesic valley and foothill grassland, vernal pools; elevation 10-110m. Blooms March-May.	**Not present.** Species not observed during 2006 and 2007 surveys.
Calamagrostis crassiglumis Thurber's reed grass	List 2	Mesic coastal scrub, marshes and freshwater swamps; elevation 10-45m. Blooms May-July.	**Not present.** Species not observed during 2006 and 2007 surveys.
Campanula californica swamp harebell	List 1B	Bogs and fens, closed-cone coniferous forest, coastal prairie, meadows and seeps, marshes and freshwater swamps, North Coast coniferous forest; elevation 1-405m. Blooms June-October.	**Low Potential**. Limited suitable wetland habitat available within the Study Area.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL FOR OCCURRENCE
Carex albida white sedge	FE, SE, List 1B	Bogs and fens, marshes and freshwater swamps; elevation 15-90m. Blooms May-July.	**Not present.** Species not observed during 2006 and 2007 surveys.
Carex comosa bristly sedge	List 2	Marshes and swamps. Lake margins, wet places; site below sea level is on a delta island; elevation -5-1005m. Blooms May-September.	**Not present.** Species not observed during 2006 and 2007 surveys.
Castilleja uliginosa Pitkin Marsh Indian paintbrush	SE, List 1A	Marshes and freshwater swamps; elevation 60m (known from only two occurrences). Blooms June-July.	**Not present**. No marshes or freshwater swamps present in the Study Area; species is presumed to be extinct.
Centromadia parryi ssp. parryi pappose tarplant	List 1B	Coastal prairie, meadows and seeps, coastal salt marshes and swamps, vernally mesic sites in valley and foothill grassland; often alkaline soils; elevation 2-420m. Blooms May-November.	**Not present.** Species not observed during 2006 and 2007 surveys.
Clarkia imbricata Vine Hill clarkia	FE, SE, List 1B	Chaparral, valley and foothill grassland; acidic sandy loam soil; elevation 50-75m. Blooms June-August.	**Not present**. Suitable soil type is not present in grassland habitat in Study Area.
Cordylanthus tenuis ssp. *capillaris* Pennell's bird's-beak (E)	FE	Closed-cone coniferous forest and chaparral. Serpentinite soils. 45-305 m. Blooms June-September.	**Unlikely.** No forests, chaparral habitat, or serpentinite soils are present in the Project Area.
Delphinium bakeri Baker's larkspur		Coastal scrub, grasslands on decomposed shale. Historically from Sonoma County; now only known from	**Unlikely.** Suitable substrate not present in Project Area. Project Area is not located within designated

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL FOR OCCURRENCE
	FE	one site in Marin County. 90-205 m. Blooms March-May.	critical habitat for this species.
Downingia pusilla dwarf downingia	List 2	Mesic valley and foothill grassland; vernal pools; elevation 1-445m. Blooms March-May.	**Not present.** Species not observed during 2006 and 2007 surveys.
Fritillaria liliaceae fragrant frittilary	List 1B	Cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland/ often serpentinite; elevation 3-410m. Blooms February-April.	**Not present.** Species not observed during 2006 and 2007 surveys.
Hemizonia congesta ssp. *leucocephala* hayfield tarplant	List 3	Coastal scrub, valley and foothill grassland. 25-365 m elevation. Blooms April-October.	**Not present.** Species not observed during 2006 and 2007 surveys.
Lasthenia burkei Burke's goldfields	FE, SE, List 1B	Mesic meadows and seeps, vernal pools; elevation 15-600m. Blooms April-June.	**Not present.** Species not observed during 2006 and 2007 surveys.
Legenere limosa legenere	List 1B	Vernal pools; elevation 1-880m. Blooms April-June.	**Not present.** Species not observed during 2006 and 2007 surveys.
Lessingia hololeuca woolly-headed lessingia	List 3	Broadleafed upland forest, coastal scrub, lower montane coniferous forest, valley and foothill grassland. Clay or serpentine soils; elevation 15-305m. Blooms June-October.	**Low Potential**. Limited suitable grassland habitat with clay soils available in Study Area.
Lilium pardalinum ssp. pitkinense Pitkin Marsh lily	FE, SE, List 1B	Cismontane woodland, meadows and seeps, marshes and freshwater swamps; elevation 35-65m. Blooms June-July.	**Low Potential**. Limited suitable wet meadow habitat available in the Study Area.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL FOR OCCURRENCE
Limnanthes vinculans Sebastopol meadowfoam	FE, SE, List 1B	Meadows and seeps, valley and foothill grassland, vernal pools; elevation 15-305m. Blooms April-May	**Not present.** Species not observed during 2006 and 2007 surveys.
Micropus amphibolus Mt. Diablo cottonweed	List 3	Broadleaved upland forest, chaparral, cismontane woodland, valley and foothill grassland; elevation 45-825m. Blooms March-May.	**Not present.** Species not observed during 2006 and 2007 surveys.
Microseris paludosa marsh microseris	List 1B	Closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland; elevation 5-300m. Blooms April-June.	**Not present.** Species not observed during 2006 and 2007 surveys.
Monardella villosa ssp. *globosa* robust monardella	List 1B	Openings in broadleaved upland forest or chaparral, cismontane woodland, valley and foothill grassland; elevation 30-300m. Blooms June-July.	**Low Potential**. Limited suitable grassland habitat available in the Study Area.
Navarretia leucocephala ssp. bakeri Baker's navarretia	List 1B	Mesic sites in cismontane woodland, lower montane coniferous forest, meadows and seeps, valley and foothill grassland, vernal pools; elevation 15-1740m. Blooms May-July.	**Not present.** Species not observed during 2006 and 2007 surveys.
Navarretia leucocephala ssp. plieantha many-flowered navarretia	FE, SE, List 1B	Volcanic ash flow vernal pools; elevation 30-950m. Blooms May-June.	**Not present.** Species not observed during 2006 and 2007 surveys.
Pleuropogon hooverianus North Coast semaphore	ST, List 1B	Broadleaved upland forest, meadows and seeps, marshes and freshwater swamps, North Coast coniferous forest,	**Not present.** Species not observed during 2006 and 2007 surveys.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL FOR OCCURRENCE
grass		vernal pools; elevation 10-671m. Blooms April-August.	
Rhynchospora californica California beaked-rush	List 1B	Bogs and fens, lower montane coniferous forest, seeps, freshwater marshes and swamps; elevation 45-1010m. Blooms May-July.	**Not present.** Species not observed during 2006 and 2007 surveys.
Rhynchospora globularis var. globularis round-headed beaked-rush	List 2	Freshwater marshes and swamps; elevation 45-60m. Blooms July-August.	**Not present.** Suitable marsh or swamp habitat not present in Study Area.
Sidalcea oregana ssp. valida Kenwood Marsh checkerbloom	FE	Edges of freshwater marshes and swamps. Endemic to Sonoma County. 115-150 m. Blooms June-September.	**Unlikely.** Only marginally suitable habitat for this species is present in the Project Area.
Trifolium amoenum showy Indian clover	FE, List 1B	Coastal bluff scrub, valley and foothill grassland; elevation 5-415m. Blooms April-June.	**Not present.** Species not observed during 2006 and 2007 surveys.
Trifolium depauperatum var. hydrophilum saline clover	List 1B	Marshes and swamps, vernal pools, mesic, alkaline sites in valley and foothill grassland; elevation 0-300m. Blooms April-June.	**Not present.** Species not observed during 2006 and 2007 surveys.

*Key to Status Codes:

FE Federal Endangered
SE State Endangered
ST State Threatened
List 1A California Native Plant Society (CNPS) list of plants presumed extinct in California

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL FOR OCCURRENCE
List 1B	CNPS list of plants rare, threatened, or endangered in California and elsewhere		
List 2	CNPS list of plants rare, threatened, or endangered in California, but more common elsewhere		
List 3			CNPS list of plants about which more information is needed.

Appendix B - List of Observed Plant Species

Appendix B. List of plant species observed in the 3192 Juniper Avenue Study Area during rare plant surveys conducted in 2006 and 2007.

Scientific Name	Common Name
Anagallis arvensis	scarlet pimpernel
Avena sp.	wild oats
Baccharis pilularis	coyote bush
Brassica nigra	wild mustard
Bromus hordeaceus	soft chess
Bromus diandrus	ripgut brome
Chamomilla suaveolens	pineapple weed
Convolvulus arvensis	bindweed
Cyperus eragrostis	nut sedge
Erodium botrys	stork's bill filaree
Eucalyptus sp.	Eucalyptus
Geranium dissectum	cut-leaf geranium
Hordeum marinum ssp. gussoneanum	Mediterranean barley
Hordeum brachyantherum	meadow barley
Hordeum leporinum	wild barley
Juncus bufonius	toad rush
Lactuca serriola	prickly lettuce
Limnanthes douglasii	common meadowfoam
Lolium multiflorum	Italian ryegrass
Lupinus sp.	lupine
Medicago polymorpha	bur clover
Picris echioides	bristly ox-tongue
Plagiobothrys bracteatus	bracted popcornflower
Plantago lanceolata	English plantain
Pleuropogon californicus	annual semaphore grass

Poa annua	bluegrass
Polygonum aviculare	common knotweed
Polypogon monspeliensis	rabbitsfoot grass
Populus sp.	cottonwood, poplar
Raphanus sativa	wild radish
Rumex crispus	curly dock
Tragopogon sp.	salsify
Vulpia myuros	fescue
Vicia sativa	spring vetch

FIRSTCARBONSOLUTIONS™

DRAFT
Good Onward / 3192 Juniper Avenue Project
Initial Study/Mitigated Negative Declaration
City of Santa Rosa, Sonoma County, California

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Grant Gruber, Project Manager

Report Date: July 31, 2020

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List of Exhibits

ACRONYMS AND ABBREVIATIONS

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

MM	Mitigation Measure
mph	miles per hour
MT	metric ton
MUP	Minor Conditional Use Permit
NAHC	Native American Heritage Commission
NO_X	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
PM_{10}	particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$	particulate matter with aerodynamic diameter less than 2.5 microns
PPV	peak particle velocity
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SCWA	Sonoma County Water Agency
SFBAAB	San Francisco Bay Area Air Basin
SR	State Route
TAC	toxic air contaminant
TCR	Tribal Cultural Resources
UCMP	University of California Museum of Paleontology
USFWS	United States Fish and Wildlife Services
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compound
ZEV	Zero Emission Vehicle

SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts from implementation of the Good Onward / 3192 Juniper Avenue Project in the City of Santa Rosa, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Santa Rosa is the Lead Agency in the preparation of this IS/MND and any additional environmental documentation required for the project. The City has discretionary authority over the proposed project. The intended use of this document is to determine the level of environmental analysis required to adequately prepare the project IS/MND and to provide the basis for input from public agencies, organizations, and interested members of the public.

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

1.2 - Project Location

The project site is located at 3192 Juniper Avenue in the City of Santa Rosa, Sonoma County, California; refer to Exhibit 1. The 2.05-acre project site consists of one parcel (Assessor's Parcel Number 134-072-004) that is surrounded by Juniper Avenue (west), Pacific Coast Drilling (north), a large multi-tenant industrial building (east), and a rural residential property (south); refer to Exhibit 2. The project site is located on the Santa Rosa, California United States Geological Survey 7.5-Minute Quadrangle, Range 8 West, Township 6 North, Section 3 (Latitude 38° 23' 59"; Longitude 122° 43' 35").

1.3 - Environmental Setting

1.3.1 - Development and Land Use Activities

The nearly level project site contains five structures totaling 4,989 square feet. The structures include a converted residence and outbuildings. All structures are one story. Several of the structures are pre-fabricated construction.

Vehicular access is provided from a paved driveway connection with Juniper Avenue.

Vegetation consists of cacti, several mature evergreen trees, and several deciduous trees. Groundcover consists of weeds and grasses. There is a 0.016 acre of wetland within the project site.

The project site is served by an on-site water well for potable water and a septic system for wastewater disposal.

There are no formal storm drainage facilities on the project site. Runoff either ponds on-site or sheet flows to a roadside drainage ditch along Juniper Avenue.

General Plan and Zoning Designations

The project site is designated "General Industry" by the City of Santa Rosa General Plan zoned "General Industrial (IG)" by the Santa Rosa Development Code.

1.4 - Project Description

1.4.1 - Summary

The project applicant (Good Onward, Inc.) is proposing to develop a commercial medical cannabis operation on the project site. Activities would include manufacturing, indoor cultivation, nursery, and distribution with transportation. The total of 25,914 square feet of buildings would be constructed or repurposed for the proposed project.

The proposed project would operate 24 hours a day, with the majority of operations occurring between 8:00 a.m. and 6:00 p.m., 7 days a week. The project will employ up to 10 employees across both phases with rotating full and part-time shifts. Management staff will be on-call 24 hours a day, 7 days a week, to address any operational or emergency issues that may arise. The proposed project would not be open to the public.

1.4.2 - Phasing

The applicant proposes that the project be developed in two phases. Exhibit 3 depicts the site plan.

- **Phase 1** includes utilizing only the existing buildings (4,989 square feet). Other than security cameras and additional lighting, no changes will be made to the exterior of the buildings. There would be full time 6 employees working. Site improvements will include a perimeter masonry wall and landscaping required for the previously approved contractor's office.
- **Phase 2** includes construction of a new 20,925 square-foot building on the southeast corner of the site. The new building would allow expansion of existing operations. Phase 2 would add 4 new employees for the use.

1.4.3 - Manufacturing Facility

The proposed cannabis manufacturing facility will include the following activities: receiving raw bulk dried materials; light manufacturing and processing of bulk materials; packaging/re-packaging including but not limited to sorting, grading, quality control, labeling/re-labeling, inventory controls; internal testing for quality control; research and development; manufacturing of cannabis oils, products and compounds using extraction methods such as but not limited to carbon dioxide (CO_2) extraction; post-processing of concentrated oil (otherwise not as Winterization); storage of raw materials and manufactured products; commercial kitchen and production of value added products such as edibles, topicals and tinctures; and, office space for typical business activities such as financial, administrative, marketing and human resources. The total square footage would be 9,836.

In addition to packaging and other light manufacturing, the applicant proposes ethanol extraction. The applicant seeks to use property for only manufacturing, using CO_2 as a primary extraction process. As the cannabis industry is rapidly developing, new innovative methods and machinery for manufacturing are becoming available, and the applicant desires to adapt their business accordingly.

For post-processing the concentrated oil, the applicant will use a three-step process. The first step is a process called Winterization, in which the fats and lipids are removed from the oil. For Winterization, the applicant will make a solution of 95(+) percent food grade ethanol and raw cannabis concentrated oil. Once the solution has been homogenized it is then covered and placed in a freezer and cooled to below freezing (0 degrees Celsius). Second, after the concentrate has been cooled to the required temperature, it is filtered through an apparatus called a Buchner funnel. This step uses a vacuum to assist in pulling the solution through laboratory filter paper, which removes the unwanted lipids and leaves only the desired cannabinoids in the solution. Finally, the solution containing ethanol and cannabinoids is placed in UL list equipment called rotational evaporation (Rotovap). The Rotovap uses a warm water bath, a vacuum pump, and a chiller to reclaim the ethanol through evaporation. This is a contained closed loop system. After the entire process is completed, the reclaimed ethanol is then put back into a sealed container for further use, and the concentrate is further refined without the need of any other solvents.

1.4.4 - Distribution and Transportation

The applicant proposes to function as a distributor on this site. These uses are complementary and overlap in significant ways. The applicant anticipates needing approximately two to three vehicles. Additionally, the applicant may hire up to two employees that will work normal business hours from 8:00 a.m. to 6:00 p.m. As required by State law, all potential employees must pass an electronic background check, and the applicant will adhere to all applicable labor and employment laws. The applicant will attempt to hire individuals from the surrounding community. The applicant will look for guidance from the State and continue to act accordingly to ensure the desired State licenses are obtained. The total square footage would be 3,644.

1.4.5 - Indoor Cultivation and Nursery

The applicant proposes on-site indoor cultivation of less than 10,000 square feet. Phase 1 would qualify the indoor cultivation for up to 5,000 square feet. With the adding of a new building in Phase 2 the applicant requests a major conditional use permit to allow up to 12,434 square feet of cultivation. The cultivation activities will include mature flowering plants as well as propagation and vegetation of immature plants. Space in the proposed facility will also be used for drying, curing and trimming of the plants.

As a complementary function to the necessary propagation from indoor cultivation, and overlapping land use requirements, the applicant proposes on-site indoor cultivation; nursery licensing (under 5,000 square feet). The nursery would share infrastructure, hiring practices, security, and odor control with the indoor cultivation operation.

1.4.6 - Security Measures

The applicant is proposing an extensive security plan, which is intended to prevent theft or diversion of any cannabis, as well as to discourage loitering, crime, and illegal or nuisance activities. The security plan includes a locked and secured facility and site, exterior and interior video surveillance, safety plans and procedures for employees, and a limited access key card entry system that will track employee movement within facility. The applicant will install a professionally monitored robbery alarm system that will be maintained in good working condition, and the applicant will obtain any necessary permits prior to installing the alarm system. The camera surveillance system will also be maintained in good working condition, and the applicant will maintain surveillance videos for 90 days. The applicant and their management team will require that employees follow necessary procedures to ensure that cannabis and any related byproducts from the project site are not visible or accessible to the public. The project location will not be open to the public.

The applicant installed a combination concrete wall/chain link fence that encloses the perimeter of the property pursuant to MNP 15-001. This will be maintained by the proposed project.

1.4.7 - Storm Drainage

A stormwater basin would be constructed along the Juniper Avenue frontage. A 4-inch diameter storm drain pipe would connect the basin to the drainage ditch along Juniper Avenue. Additionally, the existing culverts associated with the drainage ditch would be upgraded and extended.

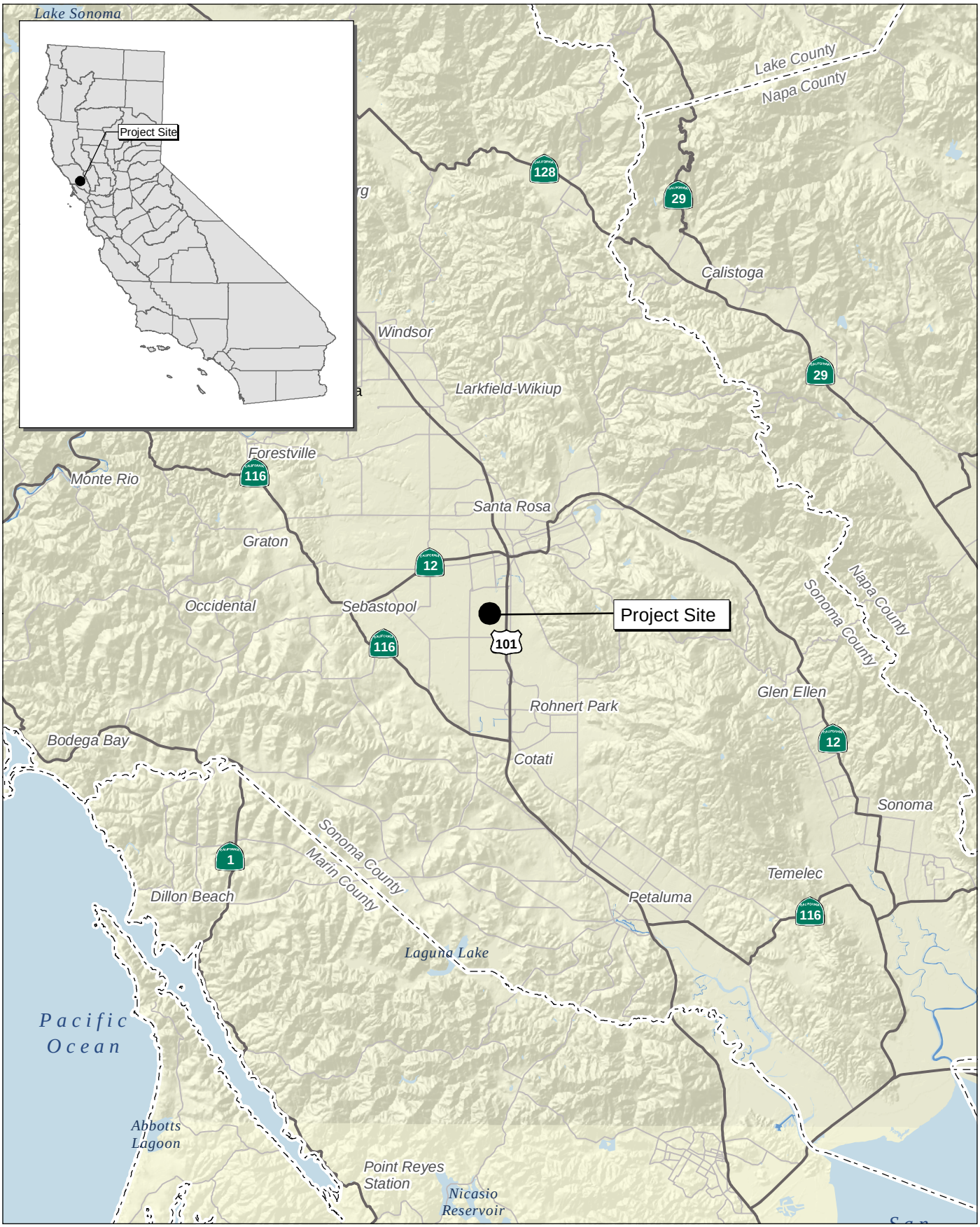
1.4.8 - Water

The existing water well would remain in use for irrigation purposes.

The applicant would install a fire hydrant along Juniper Avenue and extend municipal domestic and fire water service provided by the City of Santa Rosa to this location.

1.4.9 - Wastewater

A 4-inch diameter force sewer line would be installed to provide municipal wastewater service to the proposed project. The existing septic system would be abandoned.



Source: Census 2000 Data, The CaSIL.

FIRSTCARBON SOLUTIONS™

5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

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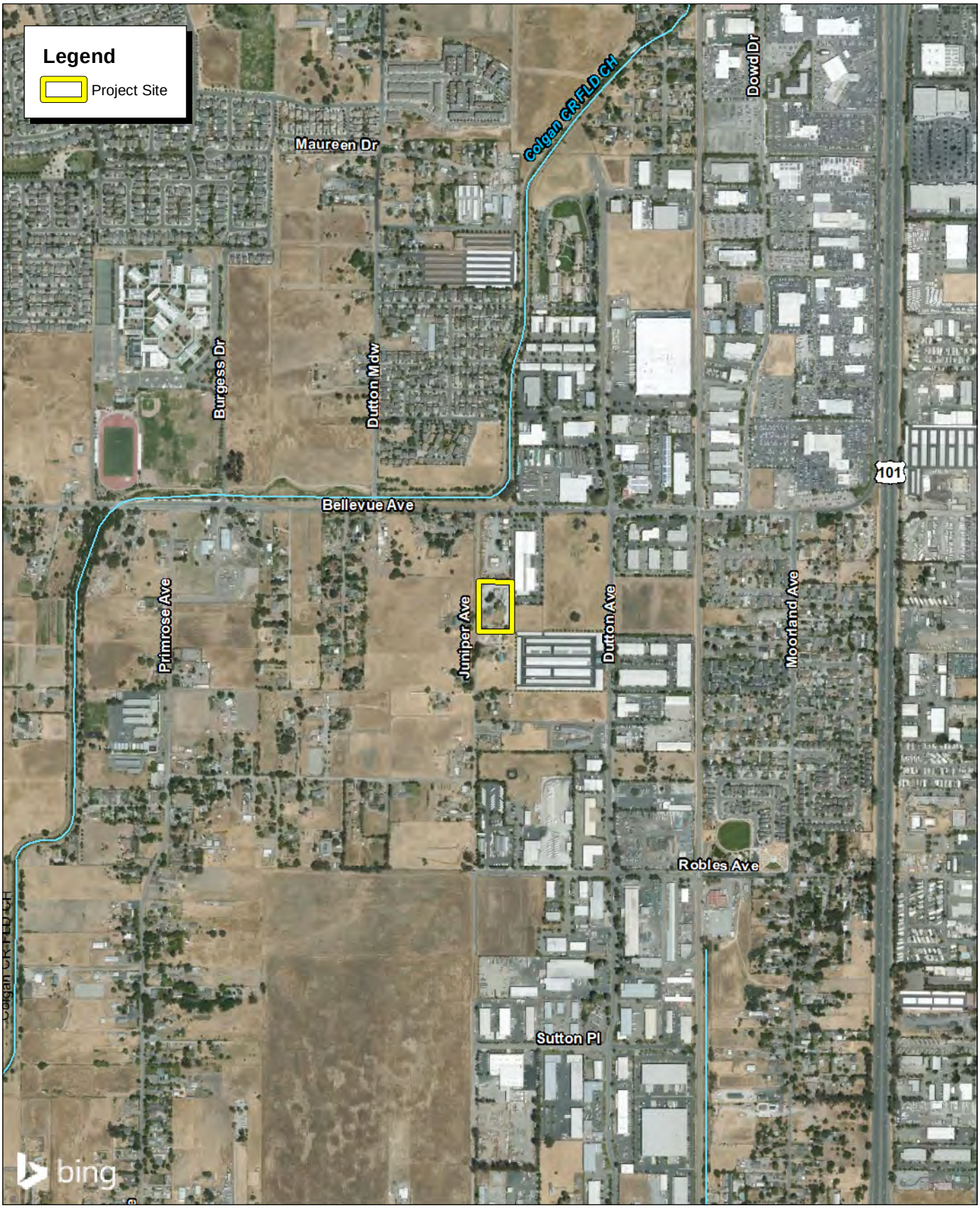

Source: Bing Aerial Imagery.

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1,000 500 0 1,000 Feet

Exhibit 2
Local Vicinity Map
Aerial Base

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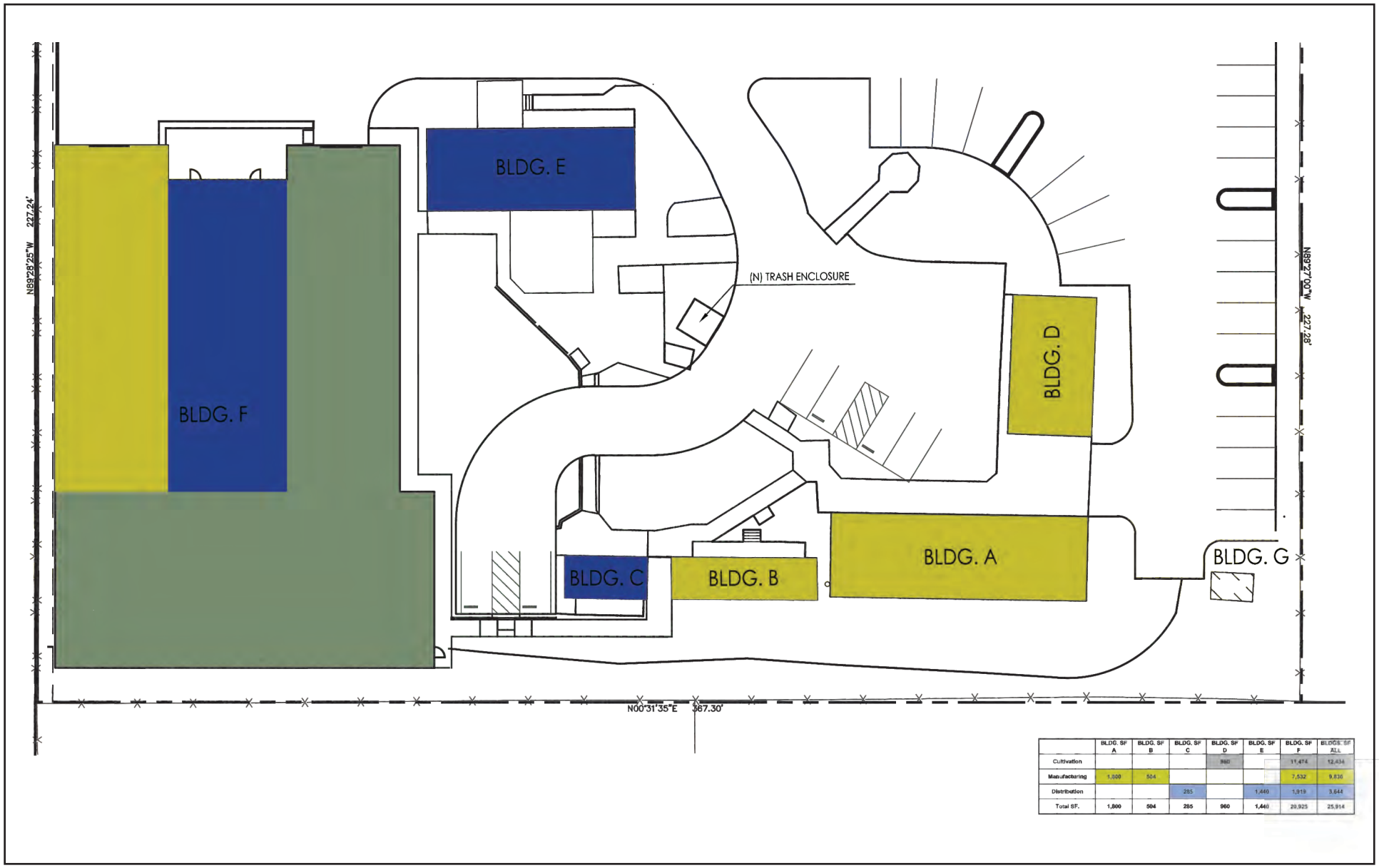

	BLDG. SF A	BLDG. SF B	BLDG. SF C	BLDG. SF D	BLDG. SF E	BLDG. SF F	BLDGS. SF ALL
Cultivation				960		11,474	12,434
Manufacturing	1,800	504				7,532	9,836
Distribution			285		1,446	1,919	3,644
Total SF.	1,800	504	285	960	1,446	20,925	25,914

Source: ARCHI|LOGIX Design and Development Strategies, July 12, 2019.

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Exhibit 3
Site Plan

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1.5 - Required Discretionary Approvals

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

- Mitigated Negative Declaration Adoption
- Major Conditional Use Permit
- Design Review

1.6 - Intended Uses of this Document

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

Conor McKay, City Planner
City of Santa Rosa
Community Development Department
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 9540
Phone: 707.543.3200
Email: ctmckay@srcity.org

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SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected					
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.					
☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Energy
☐	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards/Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Services Systems	☐	Wildfire	☐	Mandatory Findings of Significance

Environmental Determination

On the basis of this initial evaluation:

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

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

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

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

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

Date: July 31, 2020 Signed: Conor McKay, City Planner

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. 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 building 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?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

Less than significant impact. Phase 1 of the project involves repurposing the existing buildings on the project site to support cannabis production activities and install security measures including a masonry wall around the project site. Phase 2 entails the construction of a new 20,925 square-foot building in the southeast corner of the project site. The two-story building would be constructed of aluminum and concrete materials. Neighboring properties would experience little to no obstruction of Taylor Mountain and other prominent ridgelines. As such, the proposed project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

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

No impact. The segment of U.S. 101 located east of the project site is neither an Officially Designated nor Eligible State Scenic Highway. Moreover, the project site is not visible from this segment of U.S. 101. This condition precludes the possibility of the project substantially damaging scenic resources within a State scenic highway. No impact would occur.

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

Less than significant impact. Phase 1 of the project involves repurposing the existing buildings on the project site to support cannabis production activities. Phase 2 entails the construction of a new 20,925 square-foot building in the southeast corner of the project site. The two-story building would be constructed of aluminum and concrete materials. Overall, the visual appearance of the project site would change minimally and, thus, there would be no substantial visual degradation. Impacts would be less than significant.

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

Less than significant impact. The project site has existing sources of light and glare. As part of Phases 1 and 2, existing lights would be replaced and upgraded to ensure that entry points are well-lit. Additionally, a new 20,925 square-foot building would be constructed that would include new exterior light fixtures. The project would be required to comply with Santa Rosa Zoning Ordinance Section 20-30, which requires new exterior lighting fixtures to employ full cut-off fixtures or other measures to prevent light trespass. Impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2. 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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

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

No impact. The California Department of Conservation Farmland Mapping and Monitoring Program mapping for Sonoma County designates the project site as "Other Land," and therefore would not

convert any farmland protected by the state. Therefore, there would be no conversion of any farmland to non-agricultural use because of the project. No impacts would occur.

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

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

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

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

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

No impact. The project site does not contain, nor is it adjacent to, any forest land. The lack of forest land precludes the possibility of loss of forest land or its conversion to non-forest. No impact would occur.

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

No impact. The project is not adjacent to or in the immediate vicinity of any existing agricultural operations. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance adjacent to or in the vicinity of the project site. There is no forest land on or in vicinity of the project site. This condition precludes the possibility of the loss of forest land. No impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
3. 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 or) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Evaluation

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

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

Would the project:

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

Less than significant impact within mitigation incorporated. The project is located in the San Francisco Bay Area Air Basin (Air Basin), where air quality is regulated by the Bay Area Air Quality Management District (BAAQMD). The United States Environmental Protection Agency (EPA) is responsible for identifying non-attainment and attainment areas for each criteria pollutant within the Air Basin. The Air Basin is designated non-attainment for State standards for 1-hour and 8-hour ozone, 24-hour respirable particulate matter (PM_{10}), annual PM_{10}, and annual fine particulate matter ($PM_{2.5}$) (BAAQMD 2017).

To address regional air quality standards, the BAAQMD has adopted several air quality policies and plans, the most recent of which is the 2017 Clean Air Plan. The 2017 Clean Air Plan was adopted in April of 2017 and serves as the regional air quality plan (AQP) for the Air Basin for attaining federal ambient air quality standards. The primary goals of the 2017 Clean Air Plan are to protect public

health and protect the climate. The 2017 Clean Air Plan acknowledges that the BAAQMD's two stated goals of protection are closely related. As such, the 2017 Clean Air Plan identifies a wide range of control measures intended to decrease both criteria pollutants[1] and greenhouse gases (GHGs).[2] In September 2010, BAAQMD adopted their final Bay Area 2010 Clean Air Plan, which became the most recent ozone plan for the Air Basin. The 2010 Clean Air Plan identifies how the Air Basin would achieve compliance with the State 1-hour air quality standard for ozone, and how the region will reduce ozone from transporting to other basins downwind wind of the Air Basin. The 2017 Clean Air Plan updates the BAAQMD's 2010 Clean Air Plan, pursuant to air quality planning requirements defined in the California Health and Safety Code.

The 2017 Clean Air Plan also accounts for projections of population growth provided by Association of Bay Area Governments and vehicle miles traveled provided by the Metropolitan Transportation Commission and identifies strategies to bring regional emissions into compliance with federal and State air quality standards. A project would be judged to conflict with or obstruct implementation of the 2017 Clean Air Plan if it would result in substantial new regional emissions not foreseen in the air quality planning process.

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

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

Criterion 1

The primary goals of the 2017 Clean Air Plan, the current AQP to date, are to:

- Attain air quality standards;
- Reduce population exposure to unhealthy air and protecting public health in the Bay Area; and
- Reduce greenhouse gas emissions and protect the climate.

A measure for determining if the project supports the primary goals of the AQP is if the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the air quality plans. This measure is determined by comparison to the regional and localized thresholds identified by the BAAQMD for construction- and operational-related pollutants, which are used in this IS/MND in the evaluations of Impacts 3b through 3d. As discussed under Impacts 3b, 3c and 3d, the project would not create a localized violation of State or

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

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

federal air quality standards, significantly contribute to cumulative non-attainment pollutant violations, or expose sensitive receptors to substantial pollutant concentrations. The project would be required to implement the mitigation measure identified under Impact 3b and Impact 3c, specifically MM AIR-1, to be consistent with Criterion 1. The project is therefore consistent with Criterion 1 significant after incorporation of identified mitigation.

Criterion 2

The 2017 Clean Air Plan contains 85 control measures aimed at reducing air pollutants and GHGs at the local, regional, and global levels. Along with the traditional stationary, area, mobile source, and transportation control measures, the 2017 Clean Air Plan contains a number of control measures designed to protect the climate and promote mixed use, compact development to reduce vehicle emissions and exposure to pollutants from stationary and mobile sources. The 2017 Clean Air Plan also includes an account of the implementation status of control measures identified in the 2010 Clean Air Plan.

Table 1 lists the relevant Clean Air Plan policies to the project and evaluates the project's consistency with the policies. As shown below, the project would be consistent with applicable measures.

Table 1: Project Consistency with Applicable Clean Air Plan Control Measures

Control Measure	Project Consistency
Stationary Control Measures	
SS29: Asphaltic Concrete	**Consistent.** Paving activities associated with the proposed project would be required to utilize asphalt that does not exceed BAAQMD emission standards.
SS36: Particulate Matter from Trackout	**Consistent.** Mud and dirt that may be tracked out onto the nearby public roads during construction activities shall be removed promptly by the contractor based on BAAQMD's requirements. MM AIR-1, identified under Impact 3b, would implement BMPs recommended by BAAQMD for fugitive dust emissions during construction.
SS37: Particulate Matter from Asphalt Operations	**Consistent with Mitigation.** Mud and dirt that may be tracked out onto the nearby public roads during construction activities shall be removed promptly by the contractor based on BAAQMD's requirements. MM AIR-1, identified under Impact 3b, would implement BMPs recommended by BAAQMD for fugitive dust emissions during construction.
SS38: Fugitive Dust	**Consistent.** Material stockpiling and track out during grading activities as well as smoke and fumes from paving and roofing asphalt operations shall utilize best management practices to minimize the creation of fugitive dust.

Table 1 (cont.): Project Consistency with Applicable Clean Air Plan Control Measures

Control Measure	Project Consistency
Buildings Control Measures	
BL4: Urban Heat Island Mitigation	**Consistent.** The project would incorporate landscaping throughout the site. The project would provide landscaping in accordance with City standards that would serve to reduce the urban heat island effect and would include the planting of shade trees.
Energy Control Measures	
EN2: Decrease Energy Use	**Consistent.** The project applicant would be required to conform to the energy efficiency requirements of the California Building Standards Code, also known as Title 24, which was adopted in order to meet an Executive order in the Green Building Initiative to improve the energy efficiency of buildings through aggressive standards. Specifically, new development must implement the requirements of the most recent Building Energy Efficiency Standards, which is the current version of Title 24. The 2016 Building Efficiency Standards are the current regulations and went into effect on January 1, 2017. The 2016 Building Efficiency Standards are estimated to reduce electricity consumption by 281 gigawatt-hours per year and natural gas consumption by 16 million therms per year.
Natural and Working Lands Control Measures	
NW2: Urban Tree Planting	**Consistent.** The project would incorporate landscaping throughout the site. The project would provide landscaping in accordance with City standards that would serve to reduce the urban heat island effect and would include the planting of shade trees.
Source: BAAQMD, 2017.	

In summary, the project would not conflict with any applicable measures under the 2017 Clean Air Plan after the implementation of MM AIR-1; therefore, the project would be consistent with Criterion 2 after incorporation of mitigation.

Criterion 3

The 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 AQP control measures. As shown in Table 1 above, the project would incorporate several AQP control measures as project design features. Considering this information, the project would not disrupt or hinder implementation of any AQP control measures. The project is therefore consistent with Criterion 3.

Summary

As addressed above, the project would be consistent with all three criteria after the incorporation of MM AIR-1. Thus, the project would not conflict with the 2017 Clean Air Plan. Therefore, impacts associated with conflicting with or obstructing implementation of the 2017 Clean Air Plan would be less than significant with mitigation.

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

Less than significant impact with mitigation incorporated. This impact relates to localized and regional criteria pollutant impacts from project construction and operation. Potential localized and regional impacts would result in exceedances of State or federal standards for oxides of nitrogen (NO_X), particulate matter (PM_{10} and $PM_{2.5}$), or carbon monoxide (CO). NO_X emissions are of concern because of potential health impacts from exposure to NO_X emissions during both construction and operation and as a precursor in the formation of airborne ozone. PM_{10} and $PM_{2.5}$ are of concern during construction because of the potential to emit exhaust emissions from the operation of off-road construction equipment and fugitive dust during earth-disturbing activities (construction fugitive dust). CO emissions are of concern during project operation because operational CO hotspots are related to increases in on-road vehicle congestion.

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

Construction Emissions

During construction, fugitive dust (PM_{10} and $PM_{2.5}$) would be generated from site grading and other earth-moving activities. The majority of this fugitive dust would remain localized and would be deposited near the project site. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from this source. Exhaust emissions would also be generated from the operation of the off-road construction equipment, as shown in Table 2.

Construction Fugitive Dust

BAAQMD does not recommend a numerical threshold for fugitive dust particulate matter emissions. Instead, BAAQMD bases the determination of significance for fugitive dust on a consideration of the control measures to be implemented. If all appropriate emissions control measures are implemented for a project as recommended by BAAQMD, then fugitive dust emissions during construction are not considered significant.

As required by MM AIR-1, the project would implement BMPs recommended by BAAQMD for fugitive dust emissions during construction. Therefore, with mitigation, short-term construction

impacts associated with violating an air quality standard or contributing substantially to an existing or projected air quality violation would be less than significant.

Construction Air Pollutant Emissions: ROG, NO_X, PM_{10}, $PM_{2.5}$

Version 2016.3.2 of the California Emissions Estimator Model (CalEEMod) was used to estimate the project's construction emissions. CalEEMod provides a consistent platform for estimating construction and operational emissions from a wide variety of land use projects and is the model recommended by the BAAQMD for estimating project emissions. Estimated construction emissions are compared with the applicable thresholds of significance established by the BAAQMD to assess ROG, NO_X, exhaust PM_{10}, and exhaust $PM_{2.5}$ construction emissions to determine significance for this criterion.

It is anticipated that the project will be developed in two phases, with the first phase consisting of repurposing the existing buildings for use as a commercial cannabis operation. Phase 1 construction activities include the installation of security cameras, the installation of additional lighting, and site improvements. Site improvements will include a perimeter masonry wall and landscaping. Phase 2 includes construction of a new 15,000 square-foot building on the southeast corner of the site.

For the purpose of this analysis, construction of the project was assumed to begin in January of 2019 and conclude in July of 2019. It was assumed that construction of Phase 1, Phase 1 operations, construction of Phase 2, and operations of Phase 2 would all occur in 2019. Construction emissions would likely decrease because of improvements in technology and more stringent regulatory requirements if the construction schedule moves to later years. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA guidelines. Average daily construction emissions are compared with the significance thresholds in Table 3.

Table 2: Annual Construction Emissions (Unmitigated)

Construction Activity	Tons/Year			
	ROG	NO_X	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
2019				
Site Preparation	0.01	0.05	<0.01	<0.01
Grading	<0.01	0.01	<0.01	<0.01
Building Construction	0.05	0.54	0.03	0.03
Paving	<0.01	0.02	<0.01	<0.01
Architectural Coating	0.11	<0.01	<0.01	<0.01
Total Construction Emissions	**0.18**	**0.62**	**0.03**	**0.03**

Notes:
ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
Unrounded numbers from the CalEEMod output were used for all calculations.
Source: CalEEMod Output (see Appendix A).

Table 3: Construction Emissions (Unmitigated Average Daily Rate)

Parameter	Air Pollutants			
	ROG	NO_X	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
Total Emissions (tons/year)	0.18	0.62	0.03	0.03
Total Emissions (lbs/year)	351	1,244	69	63
Average Daily Emissions (lbs/day)[1]	2.31	8.19	0.45	0.42
Significance Threshold (lbs/day)	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
[1] Calculated by dividing the total lbs by the total 152 working days of construction for the duration of construction (2019–2020).
Calculations use unrounded totals.
lbs = pounds ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
Source: CalEEMod Output (see Appendix A).

As shown in Table 3, the construction emissions from all construction activities are well below the recommended thresholds of significance; therefore, the construction of the project would have less than significant impact in regards to emissions of ROG, NO_X, exhaust PM_{10}, and exhaust $PM_{2.5}$. As previously discussed, the project would implement MM AIR-1 with BMPs recommended by the BAAQMD to reduce potential impacts related to fugitive dust emissions from use of the construction equipment. Therefore, project construction would have a less than significant impact after implementation of mitigation.

Operational Emissions

Operational Carbon Monoxide Hotspot

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

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

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans; or
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; or

- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

As indicated in Section 16, Transportation/Traffic, the project would not conflict with the applicable congestion management plan. No intersections impacted by the project would experience traffic volumes of 44,000 vehicles per hour. According to the Focused Traffic Study prepared for the project by W-Trans (2020), the proposed project would be expected to result in an average of 102 new trips per day including 15 trips during the AM peak-hour and 13 trips during the PM peak-hour. The nearest intersection to the project site with data available from the Sonoma Traffic Surveys (Sonoma 2018) is Dutton Avenue and West Robles Avenue. With the intersection of Dutton Avenue and West Robles Avenue only carrying approximately 6,519 daily trips, none of the intersections near the project site would have peak-hourly traffic volumes exceeding 44,000 vehicles per hour. Furthermore, the adjacent roadways are not located in an area where vertical or horizontal atmospheric mixing is substantially limited. Therefore, based on the above criteria, the project would not exceed the CO screening criteria and would have a less than significant impact related to CO.

Operational Air Pollutant Emissions: ROG, NO_X, PM_{10}, $PM_{2.5}$

Pollutants of concern include ROG, NO_X, PM_{10}, and $PM_{2.5}$. Operational emissions are those emissions that occur when the project commences operations. Operations were analyzed assuming full-buildout of Phase 1 and Phase 2 in 2019. Approximately 3,524 square feet of existing building space and an existing 1,140-square-foot modular home would be converted as part of the project; therefore, the existing emissions were included in the analysis baseline to estimate the net increase in emissions. Assumptions used to estimate existing on-site emissions were consistent with those presented in the Focused Traffic Study for the Good Onward Cannabis Processing Project (W-Trans 2020). The major sources for existing and proposed operational emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$ are summarized in Appendix A. The project operational emissions for the respective pollutants were calculated using CalEEMod version 2016.3.2. For reasons previously discussed, the BAAQMD Criteria Air Pollutant Significance thresholds were used. The operational emissions were modeled for summer and winter seasons. The results for the estimated maximum daily net emissions are presented in Table 4, while annual net emissions from project operations are presented in Table 5.

Table 4: Daily Operational Emissions (Unmitigated)

Emissions Source	Pounds per Day			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area	0.49	0.01	<0.01	<0.01
Energy	0.01	0.05	<0.01	<0.01
Mobile (Motor Vehicles)	0.23	1.07	0.52	0.15
Estimated Maximum Daily Project Emissions	*0.72*	*1.12*	*0.52*	*0.15*
Estimated Maximum Daily Existing Emissions	0.20	0.45	0.20	0.06

Table 4 (cont.): Daily Operational Emissions (Unmitigated)

Emissions Source	Pounds per Day			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Estimated Maximum Daily Net Emissions	0.52	0.67	0.32	0.09
Thresholds of Significance	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	No	No	No	No

Notes:
ROG = reactive organic gases NO_X = nitrous oxides
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
The highest daily project emissions occurred in the winter run for NO_X, PM_{10}, and $PM_{2.5}$. The highest ROG emissions occurred in the summer run.
Calculations use unrounded results.
Source: CalEEMod Output (see Appendix A).

Table 5: Annual Operational Emissions (Unmitigated)

Emissions Source	Tons per Year			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area	0.09	<0.01	<0.01	<0.01
Energy	<0.01	0.01	<0.01	<0.01
Mobile (Motor Vehicles)	0.04	0.19	0.09	0.03
Estimated Annual Project Emissions	*0.13*	*0.20*	*0.09*	*0.03*
Estimated Annual Existing Emissions	0.03	0.07	0.03	0.01
Estimated Annual Net Emissions	0.10	0.13	0.06	0.02
Thresholds of Significance	**10**	**10**	**15**	**10**
Exceeds Significance Threshold?	No	No	No	No

Notes:
ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
Source: CalEEMod Output (see Appendix A).

As shown in Table 4 and Table 5, the project would not result in operational-related air pollutants or precursors that would exceed BAAQMD's thresholds of significance, indicating that ongoing project operations would not be considered to have the potential to generate a significant quantity of air pollutants. Therefore, long-term operational impacts associated with criteria pollutant emissions would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. A sensitive receptor is defined by the BAAQMD as the following: "Facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals, and residential areas." Existing sensitive receptors are located adjacent to the project site to the south, adjacent to the project site to west, and across Bellevue Avenue to the north of the project site.

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

- **Criterion 1:** Construction of the project would not result in an exceedance of the health risk significance thresholds.
- **Criterion 2:** Operation of the project would not result in an exceedance of the health risk significance thresholds.
- **Criterion 3:** The cumulative health impact would not result in an exceedance of the cumulative health risk significance thresholds.
- **Criterion 4:** A CO hotspot assessment must demonstrate that the project would not result in the development of a CO hotspot that would cause an exceedance of the CO ambient air quality standards.

Criterion 1: Project Construction Toxic Air Pollutants

An assessment was made of the potential health impacts to surrounding sensitive receptors resulting from the emissions of toxic air contaminants (TACs) during construction. A summary of the assessment is provided below, while the detailed assessment is provided Appendix A of this IS/MND.

Diesel particulate matter (DPM) has been identified by the California Air Resources Board (ARB) as a carcinogenic substance. Major sources of DPM include off-road construction equipment and heavy-duty delivery truck and worker activities. For purposes of this analysis, DPM is represented as exhaust emissions of $PM_{2.5}$.

Estimation of Construction DPM Emissions

Construction DPM emissions (represented as $PM_{2.5}$ exhaust) were estimated using CalEEMod version 2016.3.2, as described under the discussion for Impact 3b. Construction was assumed to occur in two phases, with Phase 2 beginning immediately following the completion of Phase 1. The total construction duration was assumed to last approximately seven months. The construction DPM emissions were assumed to be distributed over the project area with a working schedule of eight hours per day and five days per week.

Construction exhaust emissions of DPM are shown in Table 6.

Table 6: Project DPM Construction Emissions—No Mitigation

Year	On-site DPM (as $PM_{2.5}$ Exhaust) (tons/year)	Off-site DPM[(1)] (as $PM_{2.5}$ Exhaust) (tons/year)	Total $PM_{2.5}$ (tons/year)
Annual Construction Emissions (Without Mitigation)[(1)]			
2019	3.117E-02	5.147E-05	3.122E-02

Note:
(1) The off-site emissions are estimated over the construction vehicle travel route from the project, north along Juniper Avenue and east along Bellevue Avenue to HW 101 (approximately 0.83 miles)
Source: Appendix A.

Estimation of Cancer Risks

The BAAQMD has developed a set of guidelines for estimating cancer risks that provide adjustment factors that emphasize the increased sensitivities and susceptibility of young children to exposures to TACs (BAAQMD 2016). These adjustment factors include age-sensitivity weighting factors, age-specific daily breathing rates, and age-specific time-at-home factors. The recommended method for the estimation of cancer risk is shown in the equations below with the cancer risk adjustment factors provided in Table 7 for several types of sensitive/residential receptors (infant, child, and adult).

$$\text{Cancer Risk} = C_{DPM} \times \text{Inhalation Exposure Factor} \qquad \text{(EQ-1)}$$

Where:

Cancer Risk = Total individual excess cancer risk defined as the cancer risk a hypothetical individual faces if exposed to carcinogenic emissions from a particular source for specified exposure durations; this risk is defined as an excess risk because it is above and beyond the background cancer risk to the population; cancer risk is expressed in terms of risk per million exposed individuals.

C_{DPM} = Period average DPM air concentration calculated from the air dispersion model in $\mu g/m^3$

Inhalation is the most important exposure pathway to impact human health from DPM and the inhalation exposure factor is defined as follows:

$$\text{Inhalation Exposure Factor} = CPF \times EF \times ED \times DBR \times AAF/AT \qquad \text{(EQ-2)}$$

Where:

CPF = Inhalation cancer potency factor for the TAC: 1.1 (mg/kg-day)-1 for DPM
EF = Exposure frequency (days/year)
ED = Exposure duration (years of construction)
AAF = set of age-specific adjustment factors that include age sensitivity factors (ASF), daily breathing rates (DBR), and time at home factors (TAH)—see Table 7.
AT = Averaging time period over which exposure is averaged (days)

The OEHHA-recommended values for the various cancer risk parameters, shown in EQ-2, above, are provided in Table 7.

Table 7: Exposure Assumptions for Cancer Risk

Receptor Type	Exposure Frequency		Exposure Duration (years)	Age Sensitivity Factors (ASF)	Time at Home Factor (TAH) (%)	Daily Breathing Rate (DBR) [1] (L/kg-day)
	Hours/day	Days/year				
Sensitive/Residential—Infant						
3rd Trimester	24	350	0.25	10	85	361
0 to 1 year	24	350	1	10	85	1,090
1 to 2 years	24	350	1	10	85	1,090
Sensitive Receptor—Child						
3 to 16 years	24	350	1	3	72	572
Sensitive Receptor—Adult						
> 16 years	24	350	1	1	73	261

Notes:
[1] The daily breathing rates recommended by the BAAQMD for sensitive/residential receptors assume the 95th percentile breathing rates for all individuals less than 2 years of age and 80th percentile breathing rates for all older individuals.
(L/kg-day) = liters per kilogram body weight per day
Source: BAAQMD 2016. Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/rules-and-regs/workshops/2016/reg-2-5/hra-guidelines_clean_jan_2016-pdf.pdf?la=en.

Estimation of Non-Cancer Chronic Hazards

An evaluation of the potential non-cancer effects of chronic chemical exposures was also conducted. Adverse health effects are evaluated by comparing the annual receptor concentration of each chemical compound with the appropriate reference exposure limit. Available reference exposure limits promulgated by the California Office of Environmental Health Hazards Assessment were considered in the assessment.

Risk characterization for non-cancer health hazards from TACs is expressed as a hazard index. The Hazard Index is a ratio of the predicted concentration of the project's emissions to a concentration considered acceptable to public health professionals, termed the reference exposure limit.

The hazard index assumes that chronic sub-threshold exposures adversely affect a specific organ or organ system (toxicological endpoint). For each discrete chemical exposure, target organs presented in regulatory guidance were used. To calculate the hazard index, each chemical concentration or dose is divided by the appropriate toxicity reference exposure level. For compounds affecting the same toxicological endpoint, this ratio is summed. Where the total equals or exceeds 1, a health hazard is presumed to exist. For purposes of this assessment, the TAC of concern is DPM for which the OEHHA has defined a reference exposure limit for DPM of 5 $\mu g/m^3$. The principal toxicological endpoint assumed in this assessment was through inhalation.

Estimation of Health Risks and Hazards from Project Construction

The estimated health and hazard impacts at the maximum impacted sensitive receptor (MIR) from the project's construction emissions are provided in Table 8. The maximum impacted sensitive receptor was found at an existing residence located approximately 50 feet south of the southern border of the project site, off Juniper Avenue.

Table 8: Estimated Health Risks and Hazards: Project Construction

Source	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[(2)]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Risks and Hazards at the Maximum Impacted Sensitive Receptor: Infant[(1)]	7.8	0.01	0.05
Risks and Hazards at the Maximum Impacted Sensitive Receptor: Child[(1)]	1.0	0.01	0.05
Risks and Hazards at the Maximum Impacted Sensitive Receptor: Adult[(1)]	0.15	0.01	0.05
BAAQMD Thresholds of Significance	10	1	0.30
Exceeds Individual Source Threshold?	No	No	No

Notes:
(1) Maximum impacted sensitive receptor is an existing residence located approximately 50 feet south of the project near Juniper Avenue
(2) Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the REL of 5 $\mu g/m^3$.
Source: Appendix A.

As shown above in Table 8, the project's construction DPM emissions would not exceed the BAAQMD's cancer risk threshold of significance at the maximum impacted receptor would not exceed the BAAQMD's cancer risk, chronic non-cancer hazard index, and annual $PM_{2.5}$ thresholds of significance at the maximum impacted receptor. Therefore, the project's construction emissions would not result in significant health impacts to nearby sensitive receptors.

Criterion 2: Project-Specific Operation Toxic Air Pollutants

The project proposes to develop a commercial cannabis operation and would not have on-site TAC sources during operation. As described in the Focused Traffic Study prepared for the Good Onward Cannabis Processing, the project is expected to generate a net increase of 102 daily vehicle trips per. The proposed project would primarily generate trips for residents, visitors, employees, and customers traveling to and from the project site. The daily travel trips to and from the project site would primarily be generated by passenger vehicles. Because nearly all passenger vehicles are gasoline-combusted, the project would not generate significant amounts of DPM emissions during operation. Therefore, the project would not result in significant health impacts to nearby sensitive receptors during operation.

Criterion 3: Cumulative HRA

The BAAQMD recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project. As a result, a cumulative HRA was performed that examined the cumulative impacts of the project's construction emissions and sources of TAC emissions within 1,000 feet of the project. Based on proximity to the project site, the MIR was determined to be a residence located approximately 50 feet south of the project, off Juniper Avenue. Therefore, the cumulative health impacts were estimated at this location.

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

- **Surface Street Screening Tables.** BAAQMD pre-calculated potential cancer risks and $PM_{2.5}$ concentration increases for each county within their jurisdiction for roadways that meet BAAQMD's "major roadway" criteria of 10,000 vehicles or 1,000 trucks per day. Risks are assessed by roadway volume, roadway direction, and distance to sensitive receptors. There are no major roadways located within 1,000 feet of the site boundary.
- **Freeway Screening Analysis Tool**. BAAQMD prepared a Google Earth file that contains pre-estimated cancer risk, hazard index, and $PM_{2.5}$ concentration increases for highways within the Bay Area. Risks are provided by roadway link and are estimated based on direction and distance to the sensitive receptor. There are no freeways located within 1,000 feet of the site boundary.
- **Stationary Source Risk and Hazard Screening Tool**. BAAQMD prepared a Google Earth file that contains the locations of all stationary sources within the Bay Area that have BAAQMD permits. For each emissions source, BAAQMD provides conservative estimates of cancer risk, non-cancer hazards, and $PM_{2.5}$ concentrations. There is one existing stationary source located within 1,000 feet of the site boundary. The cumulative health risk results, including health risks from the existing stationary source, are summarized during project construction in Table 9.

Table 9: Summary of the Cumulative Health Impacts at the MIR during Construction

Source	Source Type	Distance from MIR[(1)] (feet)	Cancer Risk (per million)	Chronic HI	$PM_{2.5}$ Concentration ($\mu g/m^3$)
Project					
Construction	Diesel Construction Equipment	50	7.8	0.01	0.05
Existing Stationary Sources (BAAQMD Facility Number)[(2)]					
4934	Custom Wood Finishing	1,090	0.0	0.05	0.0
Cumulative Health Risks					
Cumulative Total with Project Construction			7.8	0.06	0.05
BAAQMD's Cumulative Thresholds of Significance			**100**	**10**	**0.8**
Threshold Exceedance?			No	No	No

Notes:
(1) The maximum impacted sensitive receptor is an existing residence located approximately 50 feet south of the project near Juniper Avenue
(2) Assumes emissions remain constant with time
Source: Appendix A.

As noted in Table 9, the cumulative impacts from the project construction and existing sources of TACs would be less than the BAAQMD's cumulative thresholds of significance. Thus, the cumulative health risk impacts from project construction would be less than significant.

Criterion 4: CO Hotspot

As discussed under Impact 3b, the operational CO hotspot impact as a result of project operations would be less than significant.

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

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

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

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

Two circumstances have the potential to cause odor impacts:

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

Project Construction

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

Project Operation

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. 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. Consistent with City requirements, 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. Therefore, with adherence to regulation, potential operational-source odor impacts are considered to be less than significant.

Mitigation Measures

MM AIR-1 During construction activities, the following air pollution control measures shall be implemented:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All roadways, driveways, and sidewalks shall be paved as soon as possible.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Biological Resources *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, and 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 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?	☐	☒	☐	☐

Environmental Evaluation

This section is based on a Biological Resources Assessment prepared by WRA and dated December 2017. The complete report is provided in Appendix B.

Would the project:

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

Less than significant impact with mitigation incorporated. The project site is located within designated critical habitat of California tiger salamander, and three listed plant species (Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam) were found to have a moderate ranking for potential presence on the project site. These four species are all covered by the Santa Rosa Plain Conservation Strategy and the Programmatic Biological Opinion. In addition, Allen's hummingbird, a special-status wildlife species, was found to have a moderate potential to occur within the project site.

The project site is bordered by rural residential development to the south and west and industrial development to the north and east. Current land use has been for light industrial operations with activities carried out by employees daily in the various buildings that are present and throughout the yard. Undeveloped portions of the project site are routinely and continuously disturbed by mowing.

The Programmatic Biological Opinion and Santa Rosa Plain Conservation Strategy considers seasonal wetlands to be potential suitable habitat; however, based on data gathered and observations over several years for the project site, these species were considered unlikely to be present, along with the remaining species being unlikely or having no potential to be present, based on factors that include the following:

- The species have a very limited range of endemism and has never been observed in the project site;
- Vegetation communities commonly associated with the special-status species (e.g., vernal pools, chaparral, marshes and swamps) are absent from the project site;
- Specific edaphic characteristics, such as soil derived from serpentine or volcanics, are absent from the project site;
- Specific hydrologic characteristics, such as perennial saline, are absent from the project site;
- Very unique pH characteristics, such as alkali scalds or acidic bogs and fens, are absent from the project site;
- The disturbance regime (i.e., previous and continued plowing or discing) likely precludes the species from persisting in the project site;
- The species was not observed during protocol surveys or site visits, some of which were conducted during the documented bloom period of the species.

A habitat assessment was conducted on the property in 2006 by WRA, and a report was prepared as part of the federal Clean Water Act Section 404 wetlands permitting and Endangered Species Act Section 7 consultation process. The conclusion of the assessment was that the property was not considered suitable habitat for California tiger salamander because: (1) lack of upland and aquatic habitat would make the project site unsuitable for habitation by California tiger salamander, (2) barriers to dispersal, including roads, residential and commercial developments, likely preclude

California tiger salamander from dispersing to and from the project site, (3) the project site is mostly developed and mostly disturbed, (4) no suitable breeding habitat is located in the project site, (5) the seasonal wetland and drainage ditch along the side of the road are not expected to pond water long enough for California tiger salamander larval development, and (6) there is limited estivation habitat available due to the lack of ground squirrel burrows and expansion cracks and presence of man-made structures and graveled roads (hardscape). However, it was determined that the construction and operation of the proposed project could have an adverse effect on the California tiger salamander, either through direct impact to the species or through the modification of potential habitat.

Protocol surveys for the three listed endangered species, Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam, and other special-status plants with moderate or higher potential to be present were conducted in 2008 and 2017 with negative results (none observed). Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam, are unlikely to occur within the project site because of a lack of natural vernal pool habitat, lack of vernal pool or seasonal wetland habitat with suitable inundation duration, and high level of historic and continued disturbance (i.e., mowing) and active use of the property.

In May 2010, the U.S. Fish and Wildlife Service issued a Biological Opinion (BO)(81420-2008-F-1787) for the property in Section 7 consultation with the U.S. Army Corps of Engineers as part of the Section 404 permitting process. Measures in the Biological Opinion were provided that protected California tiger salamander and the three listed plants by requiring compensatory mitigation and minimizing risk of take through conservation measures. The Biological Opinion provided for potential incidental take of the species.

In September 2010, the California Department of Fish and Game (now Fish and Wildlife) issued a Consistency Determination (2080-2010-046-03), under the California Endangered Species Act (CESA) and 2080.1 Fish and Game Code that concurred with the opinions and measures within the Biological Opinion for protecting California tiger salamander and the three listed plants. It was determined that the opinions, conclusions and incidental take were consistent with the Biological Opinion.

The proposed project could have a substantial adverse effect on California tiger salamander, Allen's hummingbird, Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam, as well as other special-status plant species, either through direct impact to the species or through modification of habitat. While no special-status species have been observed at the project site during multiple plant surveys conducted at the site, the project site does currently support approximately 0.016 acres of seasonal wetland habitat that the United States Fish and Wildlife Services (USFWS) and California Department of Fish and Wildlife (CDFW) have formally considered to be suitable habitat for these species.

As such, the USFWS requires mitigation for loss of potential suitable habitat according to the Conservation Strategy and Programmatic Biological Opinion even though it is unlikely that the species are or will ever be present.

The Applicant purchased 1.03 acres of CTS habitat conservation credits at the Hazel Mitigation Bank and 0.03 acres of CTS habitat conservation credits at the Swift/Turner Conservation Bank, for a combined total of 1.06 acres of CTS habitat conservation credits.

The compensatory mitigation measures are effective at reducing impacts to CTS by enabling the in-perpetuity conservation of larger areas of actually occupied and suitable CTS habitat at the Hazel Mitigation Bank and the Swift/Turner Conservation Bank. Additionally, implementing the avoidance and minimization measures stated below, including biological construction monitoring and stop-work order requirements, will decrease the probability of take of potentially present individuals of CTS, thus effectively reducing potential project-related impacts to the CTS population.

Therefore, with implementation of Mitigation Measures BIO-1 through BIO-5 (including the purchase of compensatory mitigation credits), potential project-related impacts will be reduced to less-than-significant as determined by the USFWS Programmatic Biological Opinion 81420-2008-F-1787, and CDFW Consistency Determination 2080-2010-046-03.

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

Less than significant impact with mitigation incorporated. Riparian habitat is not present on the project site. The United States Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB) confirmed that a seasonal wetland on the project site covering 0.016 acre as being jurisdictional in 2008. Follow up assessments in 2015 and 2017 confirmed conditions have not changed and that the seasonal wetland is still present. Therefore, the project site contains federal or State wetlands, waters, or habitats that are potentially subject to the jurisdictional authority of the USACE, the RWQCB, and CDFW.

Construction of the proposed project has potential to permanently fill the seasonal wetland habitat. In May 2010, the USACE authorized a Section 404 permit (2006-400155-N) to allow the filling of the seasonal wetland on the project site. The North Coast Regional Water Quality Control Board (North Coast RWQCB) issued a Clean Water Act Section 401 water quality certification (WDID No. 1B08123WNSO), with conditions, that certified the project would meet California State water quality standards.

The Applicant purchased 0.05 acre of wetland creation credits from the Hazel Mitigation Bank and 0.03 acres of combined Sebastopol Meadowfoam/CTS habitat establishment and preservation credits at the Swift/Turner Conservation Bank.

The compensatory mitigation measures are effective at reducing impacts to potential project-related impacts to seasonal wetland function and perseverance by enabling the creation, establishment, and in-perpetuity preservation of a larger area of robust and valuable seasonal wetland habitat Hazel Mitigation Bank and the Swift/Turner Conservation Bank.

Therefore, project-related impacts to the seasonal wetland sensitive natural community on site would be reduced to less than significant.

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

Less than significant impact with mitigation incorporated. The USACE and RWQCB confirmed that a seasonal wetland on the project site covering 0.016 acre as being jurisdictional in 2008. Follow up assessments in 2015 and 2017 confirmed conditions have not changed and that the seasonal wetland is still present. Therefore, the project site contains federal or State wetlands, waters, or habitats that are potentially subject to the jurisdictional authority of the USACE, the RWQCB, and CDFW.

Construction of the proposed project has potential to permanently fill the seasonal wetland habitat. In May 2010, the USACE authorized a Section 404 permit (2006-400155-N) to allow the filling of the seasonal wetland on the project site. The North Coast Regional Water Quality Control Board (RWQCB) issued a Clean Water Act Section 401 water quality certification (WDID No. 1B08123WNSO), with conditions, that certified the project would meet California State water quality standards. The jurisdictional delineation used for these permitting processes expires after 5 years, and the property will therefore need to be reassessed for jurisdictional waters as part of the permitting process. The permitting process will include updated mitigations and BMPs for the project site.

The Applicant purchased 0.05 acres of wetland creation credits from the Hazel Mitigation Bank and 0.03 acres of combined Sebastopol Meadowfoam/CTS habitat establishment and preservation credits at the Swift/Turner Conservation Bank.

The compensatory mitigation measures are effective at reducing impacts to potential project-related state or federally protected wetlands by enabling the creation, establishment, and in-perpetuity preservation of a larger area of robust and valuable state and federally protected wetlands at the Hazel Mitigation Bank and the Swift/Turner Conservation Bank.

Therefore, project-related impacts to state and federally protected wetlands will be reduced to less than significant.

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

Less than significant impact with mitigation incorporated. Migratory birds protected by the Migratory Bird Treaty Act consist of common and special-status bird species that cross state and/or international borders, and the birds as well as active nests are protected by this law. Almost all bird species are included in this category, and it is likely that one or more common species and one species with a moderate potential rating for presence could be present within the project site at any given time. Construction has the potential for adverse impacts to migratory birds protected by the Migratory Bird Treaty Act. Implementation of the avoidance and minimization measures listed below,

including pre-construction nesting bird surveys and nest protection measures (MM BIO-1 and MM BIO-2), would result in avoidance or minimization of potential project-related impacts to migratory birds to a less than significant level.

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

Less than significant impact. Mature trees are present on the project site. The City of Santa Rosa recognizes the aesthetic, environmental, and economic benefits mature trees provide to the citizens of the City. Chapter 17-24, "Trees" of the Santa Rosa City Code (Tree Ordinance) regulates the protection of certain trees on public and private properties within the City limits. The Tree Ordinance defines a "heritage tree" as: valley oak (*Quercus lobata*), blue oak (*Q. douglasii*), or buckeye (*Aesculus californica*) 19 inches circumference at breast height (measured at 4.5 feet above ground; or 6 inches diameter at breast height [DBH]) or greater; madrone (*Arbutus menziesii*) 38 inches circumference (12 inches DBH) or greater; coast live oak (*Q. agrifolia*), black oak (*Q. kelloggii*), Oregon oak (*Q. garryana*), canyon live oak (*Q. chrysolepis*), interior live oak (*Q. wislizenii*), red alder (*Alnus rubra [A. oregona]*), or white alder (*A. rhombifolia*) 57 inches circumference (18 inches DBH) or greater; or redwood (*Sequoia sempervirens*), bay (*Umbellularia californica*), Douglas fir (*Pseudotsuga menziesii*), or big-leaf maple (*Acer macrophyllum*) 75 inches circumference (24 inches DBH) or greater.

A Tree Permit is generally required for the removal, alteration or relocation of any "heritage tree", "protected tree" (i.e. any tree, including a heritage tree, designated to be preserved on an approved development plan or as a condition of approval of a tentative map, a tentative parcel map, or other development approval issued by the City), or "street tree" (i.e. any tree having a single trunk circumference greater than 6.25 inches or a diameter greater than 2 inches, a height of more than six feet, and one half or more of its trunk is within a public right of way or within 5 feet of the paved portion of a City street or a public sidewalk), except as exempted in Section 17-24.030 of the Tree Ordinance. Phase 2 of the project would require the removal of at least one mature tree. If a tree proposed for removal is subject to the City of Santa Rosa Tree Ordinance, a tree permit will be required. As part of the permit's terms, replacement trees would be planted on-site. This is required by Mitigation Measure BIO-7. With implementation of BIO-7, including adequate replacement plantings and maintenance, impacts associated with conflicts with local biological ordinances would be reduced to less than significant.

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

Less than significant impact. The project site is located within the Santa Rosa Plain, an ecoregion which supports habitat for several vernal pool-associated special-status species. The USFWS developed the Santa Rosa Plain Conservation Strategy as a conservation plan for these species. The Santa Rosa Plain Conservation Strategy Area is an area established by the USFWS for the protection and continued existence of California tiger salamander and three endangered plant species: Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam. The Conservation Strategy outlines the specific species of concern for this area along with guidance for specific conservation measures. In

2007 the USACE consulted with the USFWS on Section 404 permitting within the Conservation Strategy area which resulted in a Programmatic Biological Opinion. This 2007 Programmatic Biological Opinion outlines the mitigation requirements resulting from impacts to wetlands and associated impacts to California tiger salamander and the three listed plants and can be appended to permits authorized by the USACE. The Programmatic Biological Opinion outlines the compensatory mitigation and habitat conservation requirements for California tiger salamander and the three listed plant species.

The Applicant purchased 0.05 acres of wetland creation credits from the Hazel Mitigation Bank and 0.03 acres of combined Sebastopol Meadowfoam/CTS habitat establishment and preservation credits at the Swift/Turner Conservation Bank.

The compensatory mitigation measures are effective at reducing impacts to potential project-related impacts to seasonal wetland function and perseverance by enabling the creation, establishment, and in-perpetuity preservation of a larger area of robust and valuable seasonal wetland habitat Hazel Mitigation Bank and the Swift/Turner Conservation Bank.

Therefore, impacts associated with conflicts with conservation plans would be reduced to less than significant.

Mitigation Measures

MM BIO-1 If vegetation removal occurs during the breeding season (February 1 to August 31), a qualified biologist shall conduct a nesting bird survey to determine if any active nests are present and establish a no-work buffer zone around the nest until young have fledged or the nest is no longer active. The survey shall be conducted no sooner than 14 days prior to start of work and must be repeated if work ceases for longer than 14 days during the breeding bird season. Once a nest is no longer active, work may be conducted without restriction within the buffer zone. This mitigation measure does not apply if vegetation removal occurs outside the breeding season (September 1 to January 31).

MM BIO-2 A pre-construction survey for ground-nesting birds shall be performed within 30 days prior to the start of construction. A qualified avian biologist shall conduct passerine nest surveys prior to tree pruning, tree removal, ground disturbing activities, or construction activities at the project site to locate any active nests on or adjacent to the project site. However, if land-clearing activities can be performed outside of the nesting season, that is, between August 16 and January 31, no preconstruction surveys for nesting birds are warranted.

Pre-construction surveys will be conducted no more than thirty (30) days prior to the start of construction or ground disturbing activities if the activities occur during the nesting season (generally ranging from February 1 to August 15). Preconstruction surveys will be repeated at 30-day intervals until construction has started. Active nests will be identified, located, and described and protective measures will be implemented.

Protective measures will include establishment of clearly delineated (i.e., Visi-barrier, orange construction fencing) exclusion zones around each nest site. Exclusion zone size shall be determined by a qualified biologist depending on species and disturbance level, following typically accepted standards (e.g., 15 to 50 feet for Allen's Hummingbird, depending on disturbance level). The active nest sites within exclusion zones will be monitored by a qualified biologist on a weekly basis throughout the nesting season to identify any signs of disturbance or nest abandonment. The barriers marking exclusion zones will remain in place until the young have left the nest and are foraging independently or if the nest is no longer active.

MM BIO-3 To compensate for the loss of 0.016 acre of potential CTS habitat, the Applicant shall purchase 1.03 acres of CTS habitat conservation credits at the Hazel Mitigation Bank and 0.03 acres of CTS habitat conservation credits at the Swift/Turner Conservation Bank, for a combined total of 1.06 acres of CTS habitat conservation credits.

MM BIO-4 A trained biological monitor shall be present at all times when ground disturbance work is in progress at the project site. A USFWS–approved biologist will be responsible for appropriate training of the monitor. A record of all CTS observed, and the outcome of that observation, shall be kept by the biologist and submitted to USFWS. If the biologist has requested a stop work order due to take of any listed species, USFWS and CDFW shall be notified within one working day via email or telephone.

All food and food–related trash items shall be sealed in trash containers and will be removed completely from the site once every three days. All equipment shall be maintained such that no leaks of automotive fluids such as gasoline, oils, or solvents will occur. Hazardous materials shall be stored in sealable containers in a designated location at least 200 feet from aquatic habitats. Construction workers shall attend a training session by a biologist before work is started. After the initial training session, all new personnel will also be given a training session. This training session will include pictures of CTS, information on the biology of CTS, the measures required to protect CTS, federal and state regulations, and what to do if CTS is found. If CTS are found on the project site by a construction worker, the worker will immediately inform the biological monitor. All work will halt immediately, and machinery turned off within 100 feet of the CTS. The biologist shall capture and remove the CTS from the work area. Before the start of work each morning, the biological monitor will check for CTS under any equipment such as vehicles and stored pipes.

MM BIO-5 To compensate for the loss of 0.016 acres of potentially suitable but not occupied habitat for Sebastopol meadowfoam, Sonoma sunshine, and Burke's goldfields, the applicant shall purchase 0.05 acres of wetland creation credits from the Hazel Mitigation Bank and 0.03 acres of combined Sebastopol Meadowfoam/CTS habitat establishment and preservation credits at the Swift/Turner Conservation Bank.

This mitigation for impacts to suitable habitat for the endangered plants exceeds the 1.5:1 mitigation ratio following the prescriptions in the Santa Rosa Plain Conservation Strategy Programmatic Biological Opinion.

MM BIO-6 Prior to grading permit issuance, or any ground disturbing activities, applicant shall provide evidence to the City of Santa Rosa of meeting all mitigation requirements as required by the USACE, the North Coast RWQCB, and the CDFW per the Clean Water Act Section 401 and Section 404, as well as the Endangered Species Act Section 7 permitting processes.

MM BIO-7 Prior to tree removal, applicant shall obtain a permit for such activities from the City of Santa Rosa pursuant to Zoning Ordinance Section 17-24.030. During construction, the applicant shall protect retained trees in accordance with the provisions of the permit. The applicant shall plant replacement trees required by the permit by the time of project occupancy.

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

Environmental Evaluation

This section describes the potential effects from project implementation on the project site and its surrounding area. Descriptions and analysis in this section are based on information provided by the California Native American Heritage Commission (NAHC), Northwest Information Center (NWIC), National Register of Historic Places, California Register of Historic Resources, California Historical Landmarks list, California Points of Historical Interest list, California State Historic Resources Inventory, and the University of California Museum of Paleontology Paleontological Database. Supporting information is provided in Appendix C.

Cultural Resources

Would the project:

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

Less than significant impact with mitigation incorporated. FCS requested a records search from the NWIC on May 23, 2018. The records search identified three recorded cultural resources within 0.5 mile of the project site, two of which are historic and one of which is prehistoric in nature. All of the recorded cultural resources are located outside the project area and will be unaffected by the proposed project. The project site contains five one-story structures totaling 4,964 square feet. The structures include a converted residence and outbuildings and will be repurposed to support cannabis production activities. All structures are younger than 45 years in age, and do not qualify for potential inclusion in the CRHR. A review of historic aerials dating back to 1952, and topographic maps dating back to 1919 indicate the property was used for agricultural purposes until the construction of the current buildings in late 1980s and early 1990s. As such, the likelihood of encountering undiscovered historic resources is considered low.

While unlikely, subsurface construction activities always have the potential to damage or destroy previously undiscovered cultural resources. Historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Accordingly, implementation of MM CUL-1 would reduce potential impacts to historic resources to a less than significant level.

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

Less than significant impact with mitigation incorporated. The 2.05-acre project site involves the construction of a new 20,925 square-foot building and drainage improvements. Thus, mass earthwork grading is not anticipated. As discussed above, FCS requested an updated records search from the NWIC on May 23, 2018. The records search identified three recorded cultural resources within 0.5 mile of the project site, two of which are historic and one which is prehistoric in nature. All recorded cultural resources are located outside the project area and will remain unaffected by the proposed project. The prehistoric resource (P-49-004810) consisted of two isolated artifacts: A white chert turtleback core, and a chalcedony chopper or scraper. These were recorded in 2003 and are not located in close proximity to the project area.

On June 18, 2018, FCS Senior Archaeologist Dana DePietro conducted a pedestrian survey for additional unrecorded cultural resources at the project site. The survey began in the southwest corner of the project site and moved east, using north-south transects spaced at 15-meter intervals whenever possible. Soil visibility was relatively poor across the site, ranging from 15 to 30 percent, due to grasses, ground cover and hardscaped elements. Soils in sections of poor visibility were intermittently inspected using a hand trowel, and observed soils were largely composed of light brown silty soil, interspersed with small (2 to 3-centimeter) stones primarily composed of quartz, schist, and basalt. Survey conditions were documented using digital photographs and field notes. During the survey, Dr. DePietro examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, tool-making debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and

human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics). No historic or prehistoric cultural resources or raw materials commonly used in the manufacture of tools (e.g., obsidian, Franciscan chert) were found in within the project area.

Given these factors, the likelihood of encountering undiscovered prehistoric archaeological resources over the course of project construction is considered low. While unlikely, however, development activities always have the potential to encounter undiscovered archaeological resources. Such resources could consist of but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Accordingly, this would be a potentially significant impact. Implementation of Mitigation Measure CUL-1 would ensure that this potential impact is reduced to a less-than-significant level.

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

Less than significant impact with mitigation incorporated. No human remains or cemeteries are known to exist within or near the project area. However, there is always the possibility that subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. Accordingly, this is a potentially significant impact. In the event of the accidental discovery or recognition of any humans remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. In the unlikely event human remains are discovered, implementation of MM CUL-2 would reduce this potential impact to a less then significant level.

Tribal Cultural Resources

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

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

Less than significant impact. A review of the California Register of Historical Resources, local registers of historic resources, and a records search conducted at the NWIC failed to identify any listed Tribal Cultural Resources (TCRs) that may be adversely affected by the proposed project.

On July 28, 2018, FCS sent a letter to the NAHC in an effort to determine whether any sacred sites are listed on its Sacred Lands File within the project area. A response from the NAHC was received indicating that the Sacred Lands File search indicated the presence of Native American cultural resources in the immediate project area, and that tribal representatives should be contacted for additional information. The NAHC included a list of local tribal representatives available for consultation. To ensure that all Native American knowledge and potential prehistoric concerns about the project are addressed, a letter containing project information and requesting any additional

information was sent to each tribal representative. No responses have been received to date, and no TCRs have been identified as having the potential to be adversely affected by the project. Accordingly, this would be a potentially significant impact. Should undiscovered TCRs such as Native American artifacts or burials be encountered during project construction, implementation of MM CUL-1 and MM CUL-2 would ensure any impacts are reduced to a level of less than significant.

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

Less than significant impact. Notifications of project applications under AB 52 were distributed on August 20, 2019. These notifications were issued to Lytton Rancheria of California and Federated Indians of Graton Rancheria. Lytton Rancheria responded and did not request consultation. Graton did not respond. In sum, tribal consultation efforts conducted by the City of Santa Rosa pursuant to AB-52 failed to identify significant TCRs meeting the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. As such, no known significant TCRs will be adversely affected by the proposed project.

Mitigation Measures

MM CUL-1 In the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until a qualified archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology has evaluated the situation. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction activities shall be recorded on appropriate Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified archaeologist. Potentially significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. If the resource is determined to be significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the CEQA Guidelines. The archaeologist shall also perform appropriate technical analyses, prepare a comprehensive report complete with methods, results, and recommendations, and provide for the permanent curation or repatriation of the recovered resources in cooperation with the designated Most Likely Descendant (MLD) as needed. The report shall be submitted to the City of Santa Rosa, the Northwest Information Center, and the State Historic Preservation Office (SHPO), if required.

MM CUL-2 In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94, and Section 5097.98 must be followed. If during

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

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

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

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

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
6. Energy *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?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

Less than significant impact. The proposed project would consume energy as part of building operations and transportation activities. Project energy consumption is summarized in Table 10.

Table 10: Project Energy Consumption Estimates

Consumption Activity	Variable	Consumption Rate	Annual Consumption
Building Electricity	25,914 square feet	14.6 kWh/square foot/year	378,344 kWh
Building Natural Gas	25,914 square feet	37.3 cubic-feet/square foot/year	966,952 cubic feet
Transportation Fuel	237,143 annual vehicle miles traveled	35.1 miles/gallon	6,756 gallons

Notes:
kWh = kilowatt hour
Building electricity and natural gas consumption rates provided by United States Energy Information Administration
Transportation fuel consumption rate provided by National Highway Traffic Safety Administration
Source: FCS, 2020.

Operation of the proposed project would consume an estimated 378,344 kilowatt hours of electricity and an estimated 966,952 million cubic feet of natural gas on an annual basis. The proposed project's buildings would be designed and constructed in accordance with the City latest adopted energy efficiency standards, which are based on the State's building energy efficiency standards. These are widely regarded as the most advanced energy efficiency standards and compliance would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary.

Project-related vehicle trips would consume an estimated 6,756 gallons of gasoline and diesel annually. The proposed project is located in an urbanized portion of Santa Rosa. As such, it would not require employees or vendors to make lengthy or circuitous trips to reach the project site. Accordingly, transportation fuel consumption would not be wasteful, inefficient, or unnecessary. Impacts would be less than significant.

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

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

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
7. Geology and Soils *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?	☐	☐	☒	☐
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 wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Evaluation

Would the project:

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

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

No impact. The project site is not located within an Alquist-Priolo Earthquake Fault Zone and there are no active or potentially active faults within the project boundaries. This condition precludes the possibility of the proposed project being exposed to fault rupture. No impact would occur.

ii) Strong seismic ground shaking?

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

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact. The project site is not located within an area susceptible to liquefaction. Furthermore, all project structures would be required to adhere to the latest adopted edition of the California Building Standards Code, which includes seismic design standards. (For example, building foundations would need to be adequately supported by engineered fill). Compliance with seismic design standards would ensure that persons or structures would not be exposed to undue risk of loss, injury, or death from strong liquefaction. Impacts would be less than significant.

iv) Landslides?

Less than significant impact. The project site is surrounded by flat relief and is not located in an area of unstable rock or previous landslide complex. This condition precludes the possibility of the proposed project being exposed to landsliding. No impact would occur.

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

Less than significant with mitigation incorporated. The proposed project would involve construction activities that would expose soils and potentially result in substantial soil erosion. As discussed in Section 10, Hydrology and Water Quality, the State Water Resources Control Board adopted a

National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The project applicant would be required to submit a Storm Water Pollution Prevention Plan (SWPPP) in order to obtain coverage under the Construction General Permit. The purpose of the SWPPP is to identify the sources of sediment and other pollutants that could affect the quality of stormwater discharges and to describe and ensure the implementation of Best Management Practices (BMPs) to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges resulting from construction activity. Implementation of MM HYD-1 would reduce this impact to a level of less than significant.

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

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

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

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

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

No impact. The project would be served by the City of Santa Rosa municipal wastewater service. A 4-inch diameter force sewer line would be installed to provide municipal wastewater service to the proposed project. The existing septic system would be abandoned. The project would have no impact related to soils capability to support wastewater disposal.

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

Less than significant with mitigation incorporated. On May 30, 2018, FCS consulting Paleontologist Kenneth Finger conducted a University of California Museum of Paleontology database search for

potential paleontological resources within the project area. The project area is located on the geological map consists of Holocene alluvium (Q) and the half-mile search area also includes Pleistocene alluvium (Qo). Although, Holocene deposits are too young to be fossiliferous, Pleistocene alluvium has a high paleontological sensitivity and it is most likely to be present in the subsurface of the site. The database lists four vertebrate fossil localities in the Santa Rosa quadrangle, all of which have elements of late Pleistocene. 1.5 miles the northeast of project site yielded the neural spine of a ground sloth (*Glossotherium* cf. *G. robustus*).

Mass earthwork grading is not anticipated given the project involves repurposing the existing buildings and the construction of a new 20,925 square-foot building with a 15,315 square-foot building footprint would increase the net impervious surface area by an unsubstantial amount. Furthermore, the project would modify and improve existing site drainage features. As such, the likelihood of encountering undiscovered paleontological resources during project implementation is considered low.

While unlikely, there is always the possibility that ground-disturbing activities during construction may uncover previously unknown paleontological resources. This would be considered a potentially significant impact. Potential impacts would be reduced to less than significant with implementation of MM GEO-1. This topic will not be further evaluated.

Mitigation Measures

Implement Mitigation Measure HYD-1 and:

MM GEO-1 In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted. The project contractor shall notify a qualified paleontologist to examine the discovery. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If the applicant determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the City of Santa Rosa for review and approval prior to implementation, and the applicant shall adhere to the recommendations in the plan.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
8. Greenhouse Gas Emissions *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Environmental Evaluation

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

Would the project:

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

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

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

The 2017 BAAQMD Thresholds contain the following for GHGs:

> For land use development projects (including residential, commercial, industrial, and public land uses and facilities), the threshold is compliance with a qualified GHG Reduction Strategy; or annual emissions less than 1,100 metric tons per year of carbon dioxide equivalent (CO_2e); or 4.6 metric tons CO_2e/service population/year (residents + employees).

It should be noted that the BAAQMD thresholds of significance were established based on meeting the 2020 GHG targets set forth in the AB 32 Scoping Plan. For developments that would occur beyond 2020, the threshold of 1,100 MT CO_2e per year was adjusted to a "substantial progress" threshold that was calculated based on the GHG reduction goals of SB 32/Executive Order B-30-15 and the projected 2030 Statewide population and employment levels. The bright line threshold of 660 MT CO_2e per year is used to demonstrate compliance with the 2030 target. The estimated annual operational emissions and annualized construction emissions were combined and compared with the BAAQMD's threshold of 1,100 MT CO_2e per year for the 2019 operational year, and 660 MT CO_2e per year for the 2030 operational year, to determine significance for this criterion.

Construction

The project would emit GHG emissions during construction from the off-road equipment, worker vehicles, and any hauling that may occur. BAAQMD does not presently provide a construction-related GHG generation threshold but recommends that construction-generated GHGs be quantified and disclosed. BAAQMD also recommends that lead agencies (in this case, the City of Santa Rosa) make a determination of the level of significance of construction-generated GHG emissions in relation to meeting AB 32 GHG reduction goals. Total GHG emissions generated during all phases of construction were combined and are presented in Table 11. As shown in Table 11, construction of the project is estimated to generate approximately 84.7 MT CO_2e over the entire project construction duration. In order to account for the construction emissions, the total emissions generated during construction were amortized based on the life of the development (industrial use—30 years) and added to the operational emissions. The amortized emissions from construction were added to the operational emissions to determine the total emissions of the project. These total project emissions were analyzed against the BAAQMD significance threshold standard of 1,100 MT CO_2e per year for the 2019 operational year and 660 MT CO_2e per year for the 2030 operational year.

Table 11: Construction Greenhouse Gas Emissions

Construction Phase	On-site MT CO_2e/year	Off-site MT CO_2e per year	MT CO_2e per year
Site Preparation	7.7	4.6	12.4
Grading	1.1	0.1	1.1
Building Construction	51.6	16.2	67.7
Paving	2.4	0.3	2.7
Architectural Coating	0.6	0.1	0.7
		Total Construction Emissions	**84.7**
		Amortized over 30 years	**2.8**

Notes:
MT CO_2e = metric tons of carbon dioxide equivalent
Totals calculated using unrounded numbers.
Source: CalEEMod and FirstCarbon Solutions (see Appendix A)

Operation

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

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

Table 12 shows operational GHG emissions by source in year 2019. Total project operational emissions at project buildout, when both Phase 1 and Phase 2 would be operational, were estimated at 165.7 MT CO_2e. The analysis includes construction emissions amortized over the life of the project (30 years). As presented in Table 11, project construction emissions were calculated as 84.7 MT CO_2e. If annualized over 30 years, construction emissions equal 2.8 MT CO_2e. Approximately 3,524 square feet of existing building space and an existing 1,140-square-foot modular home would be converted as part of the project; therefore, the existing emissions were included in the analysis baseline to estimate the net increase in emissions. Assumptions used to estimate existing on-site emissions were consistent with those presented in the Focused Study for the Good Onward Cannabis Processing Project. The project would generate an additional 110.4 MT CO_2e in the year 2019.

Table 12: Operational Greenhouse Gas Emissions (2019)

Emission Source	Project Total MT CO_2e per year
Area	0.04
Energy	35.7
Mobile (Vehicles)	107.2
Waste	9.9
Water	12.8
Total Project Operational Emissions	165.7
Annualized Construction Emissions	2.8
Total Project Emissions	168.5
Emissions from Existing Uses	(58.1)

Emission Source	Project Total MT CO_2e per year
Net Emissions	**110.4**
BAAQMD Threshold	**1,100**
Does project exceed threshold?	**No**
Notes: MT CO_2e = metric tons of carbon dioxide equivalent. Unrounded results used to calculate totals. Source of Emissions: CalEEMod Output (see Appendix A)	

As shown in Table 12, the project's combined long-term net operational emissions and amortized construction emissions would not exceed the BAAQMD's threshold of 1,100 MT CO_2e per year.

Table 13 shows operational GHG emissions by source in year 2030. Total project operational emissions in the year 2030 were estimated at 119.8 MT CO_2e. Accounting for amortized construction emissions and including existing emissions in the analysis baseline, the project would generate a net increase of 80 MT CO_2e in the year 2030.

Table 13: Operational Greenhouse Gas Emissions (2030)

Emission Source	Project Total MT CO_2e per year
Area	0.04
Energy	21.4
Mobile (Vehicles)	79.4
Waste	9.9
Water	9.1
Total Project Operational Emissions	119.8
Annualized Construction Emissions	2.8
Total Project Emissions	122.6
Emissions from Existing Uses	(42.6)
Net Emissions	**80**
BAAQMD Threshold	**660**
Does project exceed threshold?	**No**
Notes: MT CO_2e = metric tons of carbon dioxide equivalent. Unrounded results used to calculate totals. Source of Emissions: CalEEMod Output (see Appendix A)	

As shown in Table 13, the project's combined long-term net operational emissions and amortized construction emissions would not exceed the BAAQMD's threshold of 660 MT CO_2e per year in the

year 2030. The project's generation of GHG emissions would not exceed the applicable threshold at project buildout or in the operational year 2030; therefore, impacts related to the project's generation of GHG emissions would be less than significant.

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

Less than significant impact. Significance for this impact is determined by project compliance with the City of Santa Rosa Climate Action Plan (CAP) ARB adopted 2017 Climate Change Scoping Plan Update. The project is also assessed for consistency with the City of Santa Rosa General Plan 2035 and City Council Resolution RES-2020-002.

The CAP was a qualified GHG Reduction Plan, according to the AB 32-based BAAQMD's 2017 guidelines. However, the CAP ensures consistency with AB 32 GHG reduction goals but does not address SB 32 GHG reduction goals. Since AB 32 GHG goals are based on GHG targets for the year 2020, the CAP can no longer solely be relied upon to determine project significance. To address post-2020 GHG reduction goals, the project is assessed for compliance with the ARB adopted 2017 Climate Change Scoping Plan Update. This would be achieved with an assessment of the project's compliance with applicable Scoping Plan measures.

City of Santa Rosa Climate Action Plan

The City of Santa Rosa adopted its CAP in June 2012. The CAP identifies policies to achieve the State-recommended GHG reduction target of 15 percent below 2008 levels by the year 2020 in compliance with AB 32, and the locally adopted reduction goal of 25 percent below 1990 levels. The CAP provides goals, measures, and associated actions in the topical areas of energy efficiency and conservation, renewable energy, parking and land use management, improved transport options, optimized vehicular travel, waste reduction, recycling and composting, water and wastewater, agriculture and local food, and off-road vehicles and equipment. It is acknowledged that the CAP's planning horizon of 2020 has passed at the time of this analysis and that an increased level of emission reductions are required for the State and City to meet the SB 32 year 2030 goals. Nevertheless, the actions and measures from the Santa Rosa CAP are still applicable to the proposed project. In February 2019, the City Council designated implementation of the City's CAP as a Tier One Council priority. A Climate Action Subcommittee was formed in 2019 to provide guidance and oversight of the implementation of the City's Municipal CAP and the Community CAP with a goal of reducing the local GHG emissions and ensuring long-term sustainability and resilience from climate change and its effects.

According to the City of Santa Rosa's Planning Department, a new checklist is currently being developed; however, the checklist in the adopted CAP is appropriate for present use. The City's Planning Department has previously required this checklist to show compliance with the City's CAP. While the Planning Department no longer requires this checklist, it is still strongly recommended that all measures be addressed. A Checklist is provided in Appendix A, documenting the project's compliance with the CAP.

As shown in the CAP checklist included as part of Appendix A, the project incorporates a number of features that would minimize GHG emissions. These features are consistent with project-level action items identified by the City of Santa Rosa CAP. As discussed in Impact 7(a), the project would have a less than significant generation of GHG emissions.

Santa Rosa General Plan 2035

The Santa Rosa General Plan 2035 contains GHG reduction goals and policies. The CAP and the General Plan work in conjunction to facilitate GHG emissions reductions. Measures and policies that reduce community-wide GHGs presented in the CAP are aligned with the goals and policies in the General Plan. In addition, the General Plan provides the basis for analyzing proposed development to determine consistency with the CAP goals and measures. The following GHG emissions reduction policies from the General Plan are applicable to the project.

- LUL-M Ensure new development and streetscape projects provide pedestrian and bicycle circulation improvements.
- LUL-Y-4 Require new development be oriented to the street and pedestrian friendly.
- LUL-BB-1 Require that new development provide pedestrian connections and public open spaces.
- UD-A-10 Relate landscape design to the natural setting. Require that graded areas within new development be revegetated.
- UD-A-12 Promote green building design and low impact development projects.
- UD-H-6 Minimize vegetation removal in hillside areas, and preserve large trees that partially screen development or help blend new development into views.
- T-H-3 Require new development to provide transit improvements, where a rough proportionality to demand from the project is established.
- T-L-8 Require new development to dedicate land and/or construct/install bicycle facilities, and provide bicycle parking as specified in the Zoning Code, where a rough proportionality to demand from the project is established. Facilities such as showers and bicycle storage shall also be considered.
- OSC-H Conserve significant vegetation and trees and plant new trees.
- OSC-K Reduce energy use in existing and new commercial, industrial, and public structures.
- OSC-K-1 Promote the use of site planning, solar orientation, cool roofs, and landscaping to decrease summer cooling and winter heating needs. Encourage the use of recycled content construction materials.
- OSC-K-5 Implement measures of the CAP which increase energy efficiency, including retrofitting existing buildings and facilitating energy upgrades.
- OSC-M Reduce greenhouse gas emissions.
- OSC-M-1 Meet local, regional and state targets for reduction of greenhouse gas emissions through implementation of the CAP.

As previously noted, the CAP and the General Plan work in conjunction to facilitate GHG emissions reductions. A CAP Checklist is provided in Appendix A, documenting the project's compliance with the CAP. As shown in the CAP Checklist included as part of Appendix A, the project incorporates a number of features that would minimize GHG emissions. The project would install bicycle parking consistent with regulations, comply with the City's tree preservation ordinance, and provide public and private trees in compliance with the Zoning Code. The project would reduce GHG emissions during construction by increasing diversion of construction waste, minimizing construction equipment idling time to 5 minutes or less, and maintaining construction equipment per manufacturer's specs. The project would reduce GHG emissions during operations by complying with

CALGreen Tier 1 standards, installing real-time energy monitors to track energy use, and providing outdoor electrical outlets for charging lawn equipment. The project would not conflict with the GHG emissions reduction policies of the City's General Plan.

Sonoma County Regional Climate Action Plan

In July 2016, the Sonoma County Regional Climate Protection Authority (RCPA) adopted the Sonoma County Regional Climate Action Plan, also known as Climate Action 2020 and Beyond, which applies to the County, including the City of Santa Rosa. However, the EIR for the Sonoma Regional CAP was invalidated in 2017. The Sonoma County Regional CAP focuses on relatively short-term actions to reduce emissions by 25 percent below 1990 levels by 2020 to a degree that is beyond current State mandate (AB 32). The City of Santa Rosa supports the regional GHG emissions reduction target of 25 percent below 1990 countywide emissions by 2020. Section 5.6 of the Sonoma County Regional CAP includes the community GHG emissions profile specific to the City of Santa Rosa, and the goals and state, regional, and local measures that the City of Santa Rosa will support as part of the regional approach to reducing GHG emissions. However, due to the invalidation of the Sonoma Regional CAP EIR, these goals and measures are not used as the basis for this analysis.

Santa Rosa City Council Resolution Number RES-2020-002

In January 2020, the Santa Rosa City Council adopted Resolution Number RES-2020-002, which endorses the declaration of a climate emergency and immediate emergency mobilization to restore a safe climate. Adoption of RES-2020-002 commits to City to:

- Work with RCPA on 2030 Climate Emergency Mobilization Strategy;
- Reevaluate existing policies through the lens of the climate emergency;
- Educate its employees and residents about the climate crisis and the work needed to catalyze equitable emergency climate mobilization; and
- Identify a Climate Emergency Liaison.

Additionally, the City Council commits to contributing to the development of a countywide 2030 Climate Emergency Mobilization Strategy that focuses on identifying key local actions – including a ten-year Emergency Policy Package prioritizing a short list of the most impactful local policies that will drive systems change and identify the key areas for state level advocacy. The commitments made in RES-2020-002 apply to the City and not individual development projects. As shown in the CAP checklist included as part of Appendix A, the project incorporates a number of features that would minimize GHG emissions. The proposed project would not preclude the implementation of any strategies put forth in this resolution.

SB 32 2017 Scoping Plan Update

The 2017 Climate Change Scoping Plan Update addressing the SB 32 targets was adopted on December 14, 2017. Table 14 provides an analysis of the project's consistency with the 2017 Scoping Plan Update measures. As shown in Table 14, many of the measures are not applicable to the project, while the project is consistent with strategies that are applicable.

Table 14: Consistency with SB 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Project Consistency
SB 350 50 percent Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33percent in 2020 to 50 percent in 2030.	**Not applicable.** This measure would apply to utilities and not to individual development projects. The project would purchase electricity from a utility subject to the SB 350 Renewable Mandate.
SB 350 Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	**Not applicable**. This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency over time. The project would comply with the applicable Title 24 Energy Efficiency Standards in effect at the time building permits are received.
Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	**Not applicable.** This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, vehicles accessing the project site would benefit from the standards.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million ZEVs on the road by 2030 and increasing numbers of ZEV trucks and buses.	**Not applicable.** This measure is not applicable to the project; however, vehicles accessing the project site would be benefit from the increased availability of cleaner technology and fuels. Future employees and visitors can be expected to purchase increasing numbers of more fuel efficient and zero emission cars and trucks each year. Furthermore, delivery trucks that would serve the project will be made by increasing numbers of ZEV delivery trucks.
Sustainable Freight Action Plan The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	**Not applicable.** This measure applies to owners and operators of trucks and freight operations. It is expected that deliveries throughout the State would be made with an increasing number of ZEV delivery trucks, including deliveries that would be made to the project site.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	**Consistent.** The project would not include major sources of black carbon. This measure revolves around ARB's SLCP Reduction Strategy that was released in April 2016 as a result of SB 650. SB 650 required the State to develop a strategy to reduce emissions of SLCPs. DPM reductions have come from strong efforts to reduce on-road vehicle emissions. Car and truck engines used to be the largest sources of anthropogenic black carbon emissions in California, but the State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years. These policies are based on existing technologies.

2017 Scoping Plan Update Reduction Measure	Project Consistency
SB 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita vehicle miles traveled.	**Not applicable.** The project does not include the development of a Regional Transportation Plan. Furthermore, the project is not within an SCS priority area.
Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	**Not applicable.** The project is not one targeted by the cap-and-trade system regulations, and, therefore, this measure does not apply to the project. However, the post-2020 Cap-and-Trade Program indirectly affects people and entities who use the products and services produced by the regulated industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers.
Natural and Working Lands Action Plan. The ARB is working in coordination with several other agencies at the federal, State, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor's Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California's natural and working land.	**Not Applicable**. The project site is in a developed urban area and would not be considered natural or working lands.
Source: California Air Resource Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. November. Website: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed January 13, 2020.	

As discussed in Table 14, the project would not conflict with any applicable 2017 Scoping Plan

The project would comply with the California Green Building Standards Code, including requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, and other measures that will reduce GHG emissions. Motor vehicle emissions associated with the project would be reduced through compliance with mandatory State regulations on fuel efficiency and fuel carbon content. Emissions related to project electricity consumption would be reduced as the electric utility, Sonoma Clean Power, is required to comply with the Renewable Portfolio Standard, which required utilities to increase its mix of renewable energy sources to 33 percent by 2020.

The project is 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. As discussed in Impact 7(a), the project would have a less than significant generation of GHG emissions. Therefore, the project would not conflict with any applicable plan, policy, or regulation adopted to reduce GHG emissions. The impact would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
9. Hazards and Hazardous Materials *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?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

Less than significant impact. The project site would be used to develop a commercial cannabis operation on the project site. Activities would include manufacturing, indoor cultivation, nursery, and distribution with transportation. Project construction and operations would involve the minor

routine transport and handling of minimal quantities of hazardous substances such as diesel fuels, lubricants, solvents, asphalt, pesticides, and fertilizers. Handling and transportation of these materials could result in the exposure of workers or residents to hazardous materials. However, the project would not create a significant hazard to the public or the environment, because project construction and operations would comply with applicable federal, State, and local laws pertaining to the safe handling and transport of hazardous materials.

The project applicant proposes the use of ethanol extraction, using CO_2 as a primary extraction process. To ensure safety, the project applicant would work closely with the City of Santa Rosa's Building and Fire Departments. The project would include rated rooms, systems, and ventilation to meet the inside storage and handling standards of the Building and Fire Code Requirements for Cannabis Related Occupancies. The project applicant would obtain required permits from the City of Santa Rosa Fire Department for all ethanol storage and handling. Additionally, the project applicant would implement controls that include but are not limited to engineering controls, safe work practices, administrative controls and OSHA Hazardous Prevention and Controls. Some of those measures include installing a sprinkler system, fire extinguishers, spill management systems, flammable safety storage cabinets, as well as air quality and ventilation systems. Prior to installing a sprinkler system, the project applicant will obtain all the necessary permits from the City of Santa Rosa Building and Fire Departments. The proposed project shall comply with applicable State and local fire codes and NFPA.

In addition, the project applicant would utilize engineering controls to prevent the release of flammable vapors and eliminate ignition sources from any electrical wiring and equipment. Installation of exhaust hoods would ensure that the concentration of ethanol is within acceptable standards within the facility. The little byproduct remaining after the extraction process would be stored in an industry standard waste safety can, until a local hazardous waste disposal service company picks it up.

By following all regulations and standards for storage and handling of ethanol, the applicant would be able to ensure a safe facility and workplace for employees. Training would educate staff on the proper methods for storage, handling, and safety procedures. The applicant will also have protocols and standard operating procedures in place to provide a safe workplace. Therefore, impacts associated with the routine transport, use, or disposal of hazardous materials would be considered less than significant.

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

Less than significant impact. As discussed under Impact 8a, the proposed project would utilize engineering controls to prevent the release of flammable vapors and eliminate ignition sources from any electrical wiring and equipment. Installation of exhaust hoods would ensure that the concentration of ethanol is within acceptable standards within the facility. The little byproduct remaining after the extraction process would be stored in an industry standard waste safety can, until a local hazardous waste disposal service company picks it up. The proposed project shall

comply with applicable State and local fire codes and NFPA. By following all regulations and standards for storage and handling of ethanol, the applicant would be able to ensure a safe facility.

For Phase 2, which proposes the construction of a new 20,925 square-foot building, the proposed project would involve the minor use of hazardous materials typically required during construction, such as diesel fuel and other motor lubricants. Contractors would comply with applicable federal, State, and local laws pertaining to the safe handling and transport of hazardous materials, which would minimize potential spill occurrences. Spills that may occur during construction activities would likely be minimal and potential adverse effects would be localized. Impacts would be less than significant.

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

No impact. The nearest school the project site is Bellevue Elementary School, approximately 0.46 mile to the southwest. The proposed project would not emit or handle hazardous emissions within 0.25 mile of a school. No impacts would occur.

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

Less than significant impact. The State Water Resources Control Board GeoTracker database indicates that the project site not listed on hazardous materials sites compiled to pursuant to Government Code Section 65962.5. Furthermore, no reportable releases of hazardous materials are known to have occurred on the project site. The City will require the applicant to prepare a Phase I Environmental Site Assessment to confirm these conclusions as part of the building permit application. Impacts would be less than significant.

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

No impact. The nearest public airport to the project site is the Charles M. Schulz Sonoma County Airport, approximately 8.2 miles northwest of the project site. The distance precludes the possibility of the project creating safety hazards for persons residing or working in the project site. No impact would occur.

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

Less than significant impact. The project would not modify any existing roadways in a way that would impede emergency access or evacuation. Vehicular access is provided a paved driveway connection with Juniper Avenue. This would allow for adequate emergency response and evacuation along this roadway, including to the proposed project. Therefore, the proposed project would not impair emergency access or evacuation. No impact would occur.

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

Less than significant impact. The project site is not located in a high fire zone as delineated by CalFire. Furthermore, the applicant would install a fire hydrant along Juniper Avenue to extend fire water service to this location. Compliance with the City's adopted building and fire codes and street standards would reduce potential impacts from wildfires to less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
10. Hydrology and Water Quality *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?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

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

Construction

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

Operation

The proposed project would install a private storm drainage system consisting of a stormwater basin, which would be constructed along the Juniper Avenue frontage. A 4-inch diameter storm drain pipe would connect the basin to the drainage ditch along Juniper Avenue. Additionally, the existing culverts associated with the drainage ditch would be upgraded and extended. The storm drainage system would include Low Impact Development BMPS and would be designed to detain and meter the release of peak runoff in order to avoid inundating downstream waterways and would include stormwater treatment features. This requirement is reflected in MM HYD-2. Collectively, these features would ensure that the proposed project would not violate any water quality standards. Impacts would be less than significant.

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

Less than significant impact. The proposed project would connect to the City's municipal water system to support proposed cultivation and to provide fire water; the project would continue to use an onsite water well for landscape irrigation purposes. The proposed project includes a public water main extension that would allow for municipal water to be provided by the City of Santa Rosa. The proposed project would not substantially increase existing groundwater production to levels that would deplete groundwater supplies or interfere substantially with groundwater recharge. Impacts would be less than significant.

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

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

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

which would be constructed in order to detain runoff and pollutants. As a result, impacts would be less than significant.

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

Less than significant impact. Phase 1 of the proposed project would not increase impervious surface area of the project site, as it would utilize only the existing buildings. Phase 2 of the proposed project includes the construction of a new 20,925-square-foot building on the southeast corner of the site, increasing the net impervious surface area by an unsubstantial amount. However, the proposed project would install a stormwater basin, which would be constructed along the Juniper Avenue frontage. A 4-inch diameter storm drain pipe would connect the basin to the drainage ditch along Juniper Avenue. Additionally, the existing culverts associated with the drainage ditch would be upgraded and extended. For these reasons, the proposed project would not alter drainage patterns such that downstream flooding would occur. Impacts would be less than significant.

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

Less than significant impact. Currently, there no existing formal storm drainage facilities on the project site. Runoff either ponds on-site or sheet flows to a roadside drainage ditch along Juniper Avenue. The proposed project would install a stormwater basin, which would be constructed along the Juniper Avenue frontage. A 4-inch diameter storm drain pipe would connect the basin to the drainage ditch along Juniper Avenue. Additionally, the existing culverts associated with the drainage ditch would be upgraded and extended. For these reasons, the proposed project would not create or contribute runoff that would exceed the capacity of downstream drainage systems. Impact would be less than significant.

(iv) impede or redirect flood flows?

No impact. The Federal Emergency Management Agency (FEMA) flood maps identify areas that are prone to flooding. According to the FEMA Flood Insurance Rate Map (FIRM) Number 06097C0738F the proposed project site is located in Zone X, “Area of Minimal Flood Hazard.” As such, the propose project would not substantially alter flood flows. No impact would occur.

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

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

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

Less than significant impact. The proposed project site contains existing development. Runoff either ponds on-site or sheet flows to a roadside drainage ditch along Juniper Avenue. The proposed project would install a stormwater basin, which would be constructed along the Juniper Avenue

frontage. A 4-inch diameter storm drain pipe would connect the basin to the drainage ditch along Juniper Avenue. Additionally, the existing culverts associated with the drainage ditch would be upgraded and extended. These features would improve the existing stormwater drainage and would ensure the project does conflict with or obstruct implementation of a water quality control plan. As a result, impacts would be less than significant.

Mitigation Measures

MM HYD-1 Prior to issuance of demolition permits for the proposed project, the City of Santa Rosa shall verify that the applicant has prepared a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. The SWPPP shall be designed to address the following objectives: (1) all pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled; (2) where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges (e.g., chemicals) are identified and either eliminated, controlled, or treated; (3) site Best Management Practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and (4) stabilization BMPs installed to reduce or eliminate pollutants after construction are completed. The SWPPP shall be prepared by a qualified SWPPP developer. The SWPPP shall include the minimum BMPs required for the identified Risk Level. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site BMPs Manual.

MM HYD-2 Prior to issuance of building permits for the proposed project, the City of Santa Rosa shall verify that the project applicant has prepared operational stormwater quality control measures that comply with the requirements of the current Municipal Regional Permit. Responsibilities include but are not limited to designing BMPs into project features and operations to reduce potential impacts to surface water quality and to manage changes in the timing and quantity of runoff (i.e., hydromodification) associated with operation of the project. These features shall be included in the design-level drainage plan and final development drawings. Specifically, the final design shall include measures designed to mitigate potential water quality degradation and hydromodification of runoff from all portions of completed developments. Low Impact Development features—including minimizing disturbed areas and impervious cover and then infiltrating, storing, detaining, evapotranspiring, or biotreating stormwater runoff close to its source—shall be used at each development covered by the Municipal Regional Permit. Funding for long-term maintenance of all BMPs must be specified. For each development project, the project sponsor shall establish a self-perpetuating Operation and Maintenance of Stormwater Treatment Systems plan (Municipal Regional Permit provision C.3.h). This plan shall specify a regular inspection schedule of stormwater treatment

facilities in accordance with the requirements of the Municipal Regional Permit. Reports documenting inspections and any remedial action conducted shall be submitted regularly to the City for review and approval.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
11. Land Use and Planning *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?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

a) Physically divide an established community?

No impact. The proposed project would repurpose the existing buildings on-site and construct a new 25,914 square-foot building within the southeast corner of the site. The project site is currently enclosed with a chain link fence and does not serve as a linkage between established communities. This condition precludes the possibility of division of an established community. No impact would occur.

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

Less than significant impact. The project site is currently designated as "General Industry" by the City of Santa Rosa General Plan 2035. This designation is intended for areas for manufacturing and distribution activities for creating nuisances, along with accessory offices and retailing. The project site is zoned "General Industrial" by the Santa Rosa Zoning Ordinance. This zoning is intended for areas appropriate for industrial and manufacturing activities, warehousing, wholesaling and distribution uses. The proposed project's activities would include manufacturing, indoor cultivation, nursery, and distribution with transportation, which would consistent with the General Plan and Zoning Ordinance designation. The project applicant is seeking approval of a Conditional Use Permit for the cultivation activities, which is required in order for the project to advance. As such, this is a self-mitigating aspect of the proposed project. As such, no impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
12. Mineral Resources *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

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

No impact. The project site has not supported mineral resource extraction. The Mineral Resource Zones and Resources Sectors map for Sonoma County has classified the project site in either Mineral Resource Zone 1 or Mineral Resource Zone 4, defined as area that indicate no significant mineral deposits exist or the information is inadequate for assignment. Therefore, implementation of the project would not result in the loss of availability of a known resource that would be of value to the region and the residents of the State. No impact would occur.

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

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

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
13. Noise *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?	☐	☐	☐	☒

Environmental Evaluation

Would the project result in:

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

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

Temporary Increase in Ambient Noise Levels

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

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

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

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

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

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

The noise-sensitive receptor closest to the project site is a single-family residential home located west of Juniper Avenue. This home would be located approximately 120 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment could potentially operate, simultaneously, at the project site. At this distance, worst-case construction noise levels could range up to approximately 82 dBA L_{max}, intermittently, and could have an hourly average of up to 78 dBA L_{eq}, at the façade of the nearest noise-sensitive receptor.

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

Permanent Increase in Ambient Noise Levels

Traffic Noise Impacts

A significant impact would occur if project-generated traffic would result in a substantial increase in ambient noise levels compared with those that would exist without the project. The City of Santa Rosa's General Plan has established criteria for new projects that could result in a permanent substantial increase in ambient noise levels. According to this policy, new projects should be discouraged if they have the potential to create ambient noise levels more than 5 dBA L_{dn} above existing background, within 250 feet of sensitive receptors. Therefore, for purposes of this analysis, a significant impact would occur if the project would cause traffic noise levels in the project vicinity to increase by more than 5 dBA.

A characteristic of noise is that a doubling of sound sources with equal strength is required to result in a perceptible increase (defined to be a 3 dBA or greater) in noise levels. The proposed project would generate 102 daily trips, 15 AM peak-hour trips, and 13 PM peak-hour trips. This increase in traffic volume would not double the peak hour or daily average total traffic volumes along any roadway segment in the project vicinity. Therefore, project traffic would result in a less than 3 dBA increase in existing traffic noise levels in the project vicinity. As a result, the project-related traffic volumes would not result in a substantial increase (defined to be an increase of more than 5 dBA) in ambient noise levels above existing ambient noise levels, as measured at any noise sensitive receptor in the project vicinity. Therefore, project-related traffic noise levels would have a less than significant impact.

Operational/Stationary Source Noise Impacts

Santa Rosa's City Code 17-16.120 states that "it is unlawful for any person to operate any machinery, equipment, pump, fan, air-conditioning apparatus or similar mechanical device in any manner so as to create any noise, which would cause the noise level at the property line of any property to exceed the ambient base noise level by more than five decibels (+5 dBA)." Furthermore, the City of Santa Rosa's General Plan has established criteria for new projects that could result in a permanent substantial increase in ambient noise levels. According to this policy, new projects should be discouraged if they have the potential to create ambient noise levels more than 5 dBA L_{dn} above existing background, within 250 feet of sensitive receptors. Therefore, for purposes of this analysis, a

significant impact would occur if the project would cause ambient noise levels in the project vicinity to increase by more than 5 dBA as measured at the property line of a receiving sensitive land use.

The proposed project would include new stationary noise sources such as parking lot activities and exterior mechanical equipment. Noise impacts from these stationary noise sources are discussed below.

Parking Lot Activities

Parking activities, including vehicles cruising at slow speeds, doors shutting, or cars starting, would generate noise levels of approximately 60 dBA to 70 dBA L_{max} at 50 feet. Parking lot activities would be expected to occur sporadically throughout the day as employees arrive and leave the parking lot areas. Parking lot activities could be located as close as 220 feet from the property line of the nearest noise-sensitive receptor, which is the single-family residential home located west of the project site, adjacent to Juniper Avenue. At this distance, parking lot activities could result in intermittent noise levels ranging up to 57 dBA L_{max} at the property line of this nearest residence. However, site plans indicate that the project proposes to construct a masonry wall around the perimeter of the project site that would block the line of site between this receptor and proposed parking area providing, at minimum, an additional 5 dBA of noise attenuation. With inclusion of the proposed wall, noise levels from parking lot activities would attenuate to less than 52 dBA L_{max} at the property line of the nearest noise-sensitive receptor. Even if these maximum noise levels were sustained over the entire daytime period when parking lot activity would occur, it would only result in a 24-hour average noise level of 53 dBA L_{dn} as measured at the property line of the nearest noise-sensitive receptor. According to the traffic noise contour map contained in the City's General Plan, noise levels at the project site range up to 60 dBA L_{dn} from traffic along U.S. Route 101 (City of Santa Rosa, 2009). Therefore, noise levels generated by parking lot activities would not increase existing ambient noise levels by more than 5 dBA L_{dn} above existing background noise levels. The impact of noise produced by project-related parking lot activities to sensitive off-site receptors would be less than significant.

Mechanical Equipment Operations

At the time of preparation of this analysis, details were not available pertaining to proposed rooftop mechanical ventilation systems for the project; therefore, a reference noise level for typical commercial-grade rooftop mechanical ventilation systems was used (the type of systems that would be used for a facility of this type and size). Noise levels from typical mechanical ventilation equipment are anticipated to range up to approximately 60 dBA L_{eq} at a distance of 25 feet. Proposed mechanical ventilation systems could be located as close as 100 feet from the property line of the nearest noise-sensitive receptor, which is the single-family residential home located west of the project site, adjacent to Juniper Avenue. At this distance, operational noise levels generated by this equipment would attenuate to approximately 48 dBA L_{eq} at the property line of the nearest noise-sensitive receptor. As noted previously, traffic noise levels in the project vicinity range up to 60 dBA L_{dn}. Therefore, noise levels resulting from the operation of mechanical ventilation equipment at the project site would not increase existing ambient noise levels by 5 dBA at any property lines adjacent to the site. The impact of mechanical ventilation equipment operational noise levels on sensitive off-site receptors would be less than significant.

Therefore, operational noise levels generated by stationary noise sources at the proposed project site would have a less than significant impact on receptors in the project vicinity.

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

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

Short-term Construction Vibration Impacts

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

The off-site structure nearest to the proposed construction areas is a building located on a residential property south of the project site. The facade of this nearest building would be located approximately 45 feet from the proposed construction footprint where heavy equipment would operate (the area where the new warehouse would be developed). At this distance, groundborne vibration levels would attenuate to less than 0.042 PPV from the operation of a small vibratory roller. This is below the industry standard vibration damage criteria of 0.2 PPV for this type of structure, a building of non-engineered timber construction. Therefore, construction-related groundborne vibration impacts would be considered less than significant.

Operational Vibration Impacts

Implementation of the project would not include any new permanent sources that would generate 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. Additionally, there are no active sources of groundborne vibration in the project vicinity that would produce vibration levels that would be perceptible without instruments within the project site. Lastly, the project would not result in a substantial increase in heavy vehicle traffic on surrounding roads such that nearby structures may experience perceptible vibration. Therefore, project operational groundborne vibration level impacts would be considered less than significant.

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

No impact. The airport nearest to the project site is the Charles M. Schulz–Sonoma County Airport, located approximately 8.2 miles northwest of the project site. Because of its distance from the airport runways, the project site is located well outside of the 55 dBA Community Noise Equivalent

Level (CNEL) airport noise contours. Therefore, implementation of the project would not expose people residing or working in the project area to excessive noise levels associated with public airport noise, and there would be no impacts associated with airport noise.

Mitigation Measures

MM NOI-1 During construction, the following noise abatement measures shall be implemented:

- The construction contractor shall ensure that all internal combustion engine-driven equipment is equipped with mufflers that are in good condition and appropriate for the equipment.
- The construction contractor shall ensure that unnecessary idling of internal combustion engines (i.e., idling in excess of 5 minutes) is prohibited.
- The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- At all times during project grading and construction, the construction contractor shall ensure that stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from the nearest residential land uses.
- The construction contractor shall designate a noise disturbance coordinator who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (starting too early, bad muffler, etc.) and establishment reasonable measures necessary to correct the problem. The construction contractor shall visibly post a telephone number for the disturbance coordinator at the construction site.
- The construction contractor shall limit construction hours to standard city conditions of project approval. Standard city conditions limit the hours of construction from 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays. No construction is permitted on Sundays and holidays.

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

Environmental Evaluation

Would the project:

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

Less than significant impact. The proposed project would develop a cannabis operation on the project site. The proposed project does not include any dwelling units and, thus, would not directly induce population growth. Phase 1 of the proposed project would require six full-time employees and Phase 2 would require four additional employees. The project would create a net total of 10 jobs, which would be expected to be filled from the local labor pool. Therefore, the project would not directly or indirectly induce substantial population growth. Impacts would be less than significant.

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

No impact. The existing residential structure, which was previously converted to non-residential use, would be repurposed as part of the project. No persons would be displaced and no replacement housing would be constructed. No impact would occur.

Mitigation Measures

None.

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

Environmental Evaluation

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

a) Fire protection?

Less than significant impact. The Santa Rosa Fire Department currently provides and would continue to provide fire protection services to the project site. The closest fire station to the project site is Fire Station No. 10, located approximately 1.9 miles northwest. Using an average travel speed of 25 miles per hour, it would take an engine 4 minutes 34 seconds to reach to the project site from Fire Station No. 10, which would be an acceptable emergency response time. Additionally, the proposed project would comply with all applicable fire prevention and emergency access provisions set forth in the California Building Standards Code. Overall, the project would be expected to result in a *de minimis* impact on fire protection and, thus, new or expanded police facilities would not be required. Impacts would be less than significant.

b) Police protection?

Less than significant impact. The Santa Rosa Police Department currently provides and would continue to provide police protection services to the project site. The applicant is proposing an extensive security plan, which is intended to prevent theft or diversion of any cannabis, as well as to discourage loitering, crime, and illegal or nuisance activities. The security plan includes a locked and secured facility and site, exterior and interior video surveillance, safety plans and procedures for employees, and a limited access key card entry system that will track employee movement within

facility. The applicant will install a professionally monitored robbery alarm system and video surveillance system. The project location will not be open to the public. The applicant will replace the existing chain link fence that encloses the perimeter of the property with a masonry wall. Two new gates will be installed. Overall, these measures would serve to deter and prevent criminal activity and the proposed project would be expected to result in a *de minimis* impact on police protection and, thus, new or expanded police facilities would not be required. Impacts would be less than significant.

c) Schools?

No impact. The proposed project would develop a cannabis operation and would not directly result in population growth that would increase K-12 enrollment in the Santa Rosa public school system. This precludes the need for new or expanded school facilities. No impact would occur.

d) Parks?

No impact. The proposed project would develop a cannabis operation and would not directly result in population growth that would increase demand for park facilities. The proposed project would create up to ten new employment opportunities, and thus, the increase in demand for parks and recreational facilities would be minimal. Impacts would be less than significant.

e) Other public facilities?

No impact. The proposed project would develop a cannabis operation and would not directly result in population growth that would increase demand for other public facilities such as libraries. The proposed project would not significantly create a new demand for a new or expanded library or other public facilities. No impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
16. Recreation				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Evaluation

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

No impact. The proposed project would develop a commercial cannabis operation and would not directly result in population growth that would increase demand for park and recreational facilities. The proposed project would create up to ten new employment opportunities, and thus, the increase in demand for parks and recreational facilities would be minimal. Impact would be less than significant.

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

No impact. The proposed project would develop a commercial cannabis operation and would not be open to the public. The project would not include recreational facilities. This condition precludes the possibility of the construction or expansion of recreation facilities having an adverse effect on the environment. No impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
17. Transportation *Would the project:*				
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project 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?	☐	☐	☐	☒

Environmental Evaluation

This section is based on a Focused Traffic Study prepared by Whitlock & Weinberger Transportation, Inc. (W-Trans). The complete report is provided in Appendix D.

Would the project:

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

Less than significant impact. The proposed project would include manufacturing, indoor cultivation, nursery, and distribution. The proposed project's trip generation is provided in Table 15. At full-buildout, the proposed project would be expected to result in an average of 102 new trips per day including 15 trips during the AM peak-hour and 13 trips during the PM peak-hour. Because the project generates less than 50 peak-hour trips, it is considered to have a *de minimis* impact on intersection operations. Impacts would be less than significant.

Table 15: Trip Generation Summary

Status	Land Use	Units	Daily	AM Peak-hour			PM Peak-hour		
				In	Out	Total	In	Out	Total
Existing	General Light Industrial	3,549 square feet	18	2	0	2	0	2	2
	Single Family Detached Housing	1 dwelling unit	9	0	1	1	1	0	1
	Subtotal		*27*	*2*	*1*	*3*	*1*	*2*	*3*
Proposed	General Light Industrial	25,914 square feet	129	16	2	18	2	14	16

Status	Land Use	Units	Daily	AM Peak-hour			PM Peak-hour		
				In	Out	Total	In	Out	Total
Net Change			**102**	**—**	**—**	**15**	**—**	**—**	**13**
Source: W-Trans 2020.									

Congestion Management Program

The Sonoma County Transportation Authority is designated as the Congestion Management Agency for Sonoma County. At full-buildout, the proposed project would be expected to result in an average of 102 new trips per day including 15 trips during the AM peak-hour and 13 trips during the PM peak-hour. Because the project generates less than 50 peak-hour trips, it is considered to have a *de minimis* impact on congestion management agency designated facilities (i.e., U.S. 101). Impacts would be less than significant.

Public Transit, Bicycles, and Pedestrians

The segment of Juniper Avenue adjacent to the project site is a very low-volume local roadway and does not have any scheduled transit service or formal bicycle or pedestrian facilities. The proposed project would not be open to the public and, therefore, would not be expected to increase use of transit, bicycle, or pedestrian modes of transportation. Thus, the absence of existing transit service or bicycle or pedestrian facilities would not conflict with adopted policies in this regard. Impacts would be less than significant.

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

Less than significant impact. In November 2017, the Governor's Office of Planning and Research (OPR) released a technical advisory containing recommendations regarding the assessment of VMT, proposed thresholds of significance, and potential mitigation measures for lead agencies to use while implementing the required changes contained in SB 743. Also in November 2017, the OPR released the proposed text for Section 15064.3, "Determining the Significance of Transportation Impacts," which summarized the criteria for analyzing transportation impacts for land use projects and transportation projects and directs lead agencies to "choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure." The OPR recommends that for most instances an efficiency metric threshold such as VMT per capita or per employee should be adopted and that a 15 percent reduction below that of existing development would be a reasonable threshold.

As noted in the OPR Guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The current deadline for adopting policies to implement SB 743 is July 2020; the change to VMT was formally adopted as part of updates to the CEQA Guidelines in 2018. However, the City has not established specific local VMT thresholds, so the guidance on how to evaluate the project in terms of VMT as set forth by OPR was referenced.

The proposed project consists of an infill intensification on an existing rural residential parcel. The project would generate 83 trips on a daily basis, and the Technical Advisory indicates that any project generating fewer than 110 daily trips "generally may be assumed to cause a less-than-significant VMT impact." Based on this guidance the project's impact would be less than significant.

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

Less than significant impact with mitigation incorporated. The project site is located on the east side of Juniper Avenue, approximately 500 feet south of Bellevue Avenue, and would continue to be accessed via two existing driveways. Juniper Avenue varies in width between approximately 15 and 18 feet and has a posted speed limit of 25 mph. As proposed in the site plan, the driveways would extend east from Juniper Avenue and connect to a drive aisle that would run along the western edge of the site. The drive aisle would provide access to a surface parking lot located at the northern end of the site. As proposed, all driveways and drive aisles would be of sufficient width to accommodate all anticipated vehicles and on-site circulation would be expected to operate acceptably.

At private roads and driveways, a substantially clear line of sight should be maintained between the driver of a vehicle waiting at the driveway and the driver of an approaching vehicle. Adequate time should be provided for the waiting vehicle to either cross, turn left, or turn right, without requiring the through traffic to radically alter their speed.

Sight distances along Juniper Avenue at the project driveways were evaluated based on sight distance criteria contained in the Highway Design Manual published by Caltrans. For the posted 25-mph speed limit on Juniper Avenue, the recommended stopping sight distance is 150 feet. Based on a review of field conditions, sight distance at both driveways extends more than 400 feet in both directions, which is more than adequate for the posted speed limit. Sight distance is adequate at both driveways to accommodate all turns into and out of the site.

Roadways with volumes of 400 vehicles per day or less are considered "Very Low Volume Roadways" under criteria published by the American Association of State Highway and Transportation Officials (AASHTO). Juniper Avenue provides access to nine single family homes and could be used to access another approximately 15 residences located on Oasis Drive. Based on standard ITE rates, these 24 properties would be expected to generate an average 227 trips per day. When the 83 daily project trips are added to the residential trips, Juniper Avenue would still have daily volumes well below 400 and would be considered a "very low volume" roadway.

In the AASHTO *Guidelines for Geometric Design of Very Low-Volume Local Roads* published in 2001, design criteria are presented that are less restrictive than those applied on higher volume roads. These standards do not compromise safety, but discourage widening of lanes and shoulders, changes in horizontal and vertical alignment, and other roadside improvements except where such changes are likely to provide substantial safety benefits.

The property north of the project site has dedicated approximately 25 feet of right-of-way to the City for the future widening of Juniper Avenue and the proposed project would do the same. The

dedicated frontage on the east side of the roadway is flat and can be used by drivers to allow opposing traffic to pass, so while the road is narrow there are numerous opportunities for vehicles to pass one another without compromising safety. Under these guidelines, a roadway width greater than 15 to 18 feet would be desirable; however, lacking any specific safety concerns, any widening or other improvements would not be necessary in the near term as the first phase of the project would be very similar to the previous concrete contractor operation, which has been operating acceptably for some time. However, upon the completion of the second phase, when the project would be expected to generate more trips, the applicant should implement half-width improvements along the frontage of Juniper Avenue , consistent with the City's future plans for the roadway. The responsibility and timing for these improvements is reflected in MM TRANS-1. These improvements would be located with an existing disturbed portion of the project site and would not result in new impacts not already evaluated and disclosed in this ISMND.

Although Juniper Avenue is narrow in width, the roadway has been operating acceptably and the proposed project would not be expected to change during Phase 1 of the project. While Juniper Avenue is substandard in terms of width, the roadway has been operating acceptably and there is room on the east side of the roadway between the project site and Bellevue Avenue for vehicles to pull over and pass one another without compromising safety. Impacts are less than significant with mitigation incorporated.

d) Result in inadequate emergency access?

No impact. Emergency access would be available from two unpaved driveway connections with Juniper Avenue. This would allow for adequate emergency response and evacuation along this roadway, including to the proposed project. Therefore, the proposed project would not impair emergency access or evacuation. No impact would occur.

Mitigation Measures

MM TRANS-1 Prior to issuance of the certificate of occupancy for the Phase 2 warehouse, the applicant shall install half-width improvements along the Juniper Avenue frontage in accordance with the applicable General Plan street section. The City of Santa Rosa shall determine that the roadway has been improved in accordance with the applicable design standard prior to issuing the certificate of occupancy.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
18. Utilities and Service Systems *Would the project:*				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater 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?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

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

Wastewater from the project would be conveyed to the Laguna Treatment Plant for treatment and disposal consistent with standards established by the North Coast RWQCB. Wastewater from the

project would consist mostly of municipal effluent and as such would not substantially increase pollutant levels in the wastewater or exceed the North Coast RWQCB standards. In addition, the project does not propose any industrial or commercial use where pollutant levels or wastewater volumes are typically high.

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

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

Less than significant impact. The proposed project would be served by the City of Santa Rosa municipal water supply system to support proposed cultivation and to provide fire water, and would continue to use an existing onsite well for landscape irrigation. The proposed project would require the construction of a new water connection to an existing off-site water line, which would cross through existing disturbed areas. The proposed project would be expected to result in a maximum daily demand of 3,124 gallons per day or 3.5 acre-feet annually, based on factors in the City of Santa Rosa 2015 Urban Water Management Plan, which estimates water demand at 1.7 acre-feet per year for commercial retail uses.

The 2015 Urban Water Management Plan projects that total potable water demand in the City of Santa Rosa will be 24,149-acre-feet in 2020 and 28,140 acre-feet in 2040. The Urban Water Management Plan indicates that potable water supplies will total 31,400-acre-feet in both 2020 and 2040. The project's demand is accounted for in these numbers because it is an existing developed site. Moreover, the project's annual demand of 3.5-acre-feet represents less than 0.001 percent of total Citywide potable water demand in both 2020 and 2040. Furthermore, the excess supply forecast by the 2015 Urban Water Management Plan for both 2020 and 2040 provide evidence that adequate long-term water supplies are available for municipal water users in Santa Rosa. Therefore, adequate water supply existing to serve the project and new water entitlements would not be required. Impacts would be less than significant.

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

Less than significant impact. The proposed project would be served by the City of Santa Rosa water supply system. The proposed project would require the construction of a new water connection to an existing off-site water connection. The proposed project would generate a maximum of 1,000 gallons of effluent per day (0.001 million gallons per day [mgd]). The Laguna Treatment Plant is a tertiary level treatment facility that has an average daily dry weather flow of 17.5 mgd and is permitted for a maximum average daily dry weather flow of 21.34 mgd. As a result, the project represents less than 1 percent of the average daily dry weather flow and permitted capacity and the treatment plant would contain sufficient capacity to serve the project. As such, the project would not create a need for new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant.

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

Less than significant impact. Solid waste from Santa Rosa is landfilled at the Redwood Sanitary Landfill in Marin County, which has 26 million cubic yards of remaining capacity. The proposed project would be expected to generate 200 cubic yards of solid waste annually. That amount of solid waste represents less than 0.001 percent of the remaining capacity of the Redwood Sanitary Landfill. As such, adequate landfill capacity exists to serve the project and the project does not create a need for new or expanded landfill capacity. Impacts would be less than significant.

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

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

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
19. Wildfire *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?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

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

No impact. Emergency access would be available from two unpaved driveway connections with Juniper Avenue. This would allow for adequate emergency response and evacuation along this roadway, including to the proposed project. Therefore, the proposed project would not impair emergency access or evacuation. No impact would occur.

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

No impact. The project site is located within an urbanized portion of the City of Santa Rosa that was not threatened by the 2017 wildfires. The 2017 Tubbs Fire limit was located more than 5 miles to the north of the project site. Furthermore, the project site is not located in a wildland urban interface zone, CAL FIRE “Very High” or “High” Fire Hazard Zone. No impact would occur.

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

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

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

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

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
20. Mandatory Findings of Significance				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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?	☐	☐	☒	☐

Environmental Evaluation

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

Less than significant impact with mitigation incorporated. With the incorporation of the identified mitigation measures, the proposed project would not degrade the quality of the environment; substantially reduce the habitats of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animals; or eliminate important examples of major periods of California history or prehistory. Impacts would be less than significant.

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

Less than significant impact. The proposed project would result in potentially significant project-specific impacts to biological resources, cultural resources and geology/soils, and could result in hazards and noise impacts. Furthermore, the Air Quality and Transportation/Traffic analyses presented in Section III and Section XVII, respectively, of this document considered cumulative impacts and determined that cumulative air quality and traffic impacts would less than significant. Each topic is discussed as follows:

Air Quality

The geographic scope of the cumulative air quality analysis is the San Francisco Bay Air Basin, which encompasses all or portions of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma counties. Air pollution is regarded as a regional issue; therefore, this would be the area most likely to be impacted by project emissions.

The Bay Area Air Quality Management District (BAAQMD) air quality plan uses the growth projections and land use information in adopted general plans to estimate future average daily trips and then vehicle miles traveled (VMT), which are then provided to BAAQMD to estimate future emissions in the AQPs. Existing and future pollutant emissions computed in the AQP were based on land uses and growth projections from area general plans. These emissions form the emissions budget used by the BAAQMD to demonstrate air quality conformity for the Regional Transportation Plan. The future emissions, combined with emissions from all other sources, are modeled in the BAAQMD's regional air quality models to determine the reductions required to attain the air quality standards by the applicable federal deadline. AQPs detail the control measures and emission reductions required for reaching attainment of the air standards.

The proposed project is consistent with the growth projections contained in the City of Santa Rosa General Plan and is consistent with the projections contained in the AQPs because adoption of the General Plan occurred after the latest AQPs were adopted. Because the proposed project is consistent with the growth assumptions contained in the AQPs, it would not have a cumulative contribution to inconsistency with the clean air plans.

Other approved and pending projects would result in new air emissions during construction or operations (or both). The proposed project would emit construction and operational emissions at levels that would not exceed the BAAQMD thresholds after the implementation of feasible emissions reductions measures. Other projects that exceed BAAQMD thresholds would also be required to implement feasible emissions reductions measures. Because the proposed project' emissions would not exceed BAAQMD thresholds, it would not cumulatively contribute to impacts related to air quality violations.

Other approved and pending projects would result in some net increase of criteria pollutants for which the Air Basin is classified as "nonattainment." Because of the small size of the proposed

project, its net increase is not considered cumulatively considerable. Emissions of criteria pollutants from other projects may or may not be considered cumulatively considerable. Because the proposed project's net increase is not cumulatively considerable, it would not have a cumulative contribution to nonattainment of criteria pollutants.

Biological Resources

The geographic scope of the cumulative biological resources analysis is the project vicinity. Biological impacts in a rural residential setting, where foraging habitats and similar areas are disrupted by farming activities, tend to be localized. Therefore, the area near the project boundaries would be the area most affected by project activities (generally within a 0.5-mile radius).

Potential project-level impacts on special-status plants and wildlife are limited to the California tiger salamander, Allen's hummingbird , Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam; therefore, the project would not have the potential to contribute to the cumulative loss of any other special-status plant or wildlife species. The proposed project would implement standard mitigation for the previously mentioned special-status species, which would involve pre-construction surveys, and if necessary, implementation of avoidance measures, which would reduce impacts to a level of less than significant. Other projects therefore, would be required to mitigate for impacts on special-status species in a manner similar to the proposed project. As, such, the proposed project, in conjunction with other projects, would not have a cumulatively considerable contribution to impacts on special-status species.

Cultural Resources

The geographic scope of the cumulative cultural resources analysis is the project vicinity. Cultural resource impacts tend to be localized because the integrity of any given resource depends on what occurs only in the immediate vicinity around that resource, such as disruption of soils; therefore, in addition to the project boundaries itself, the area near the project boundaries would be the area most affected by project activities (generally within a 500-foot radius).

Construction activities associated with development projects in the project vicinity may have the potential to encounter undiscovered cultural resources. These projects would be required to mitigate for impacts through compliance with applicable federal and state laws governing cultural resources. Even if a significant cumulative impact could be found, the proposed project would not make a cumulatively considerable impact. Most of the project site have been previously disturbed by actives such as disking and tilling of the soil. As such, the project site is in a disturbed state, which limits the potential for undiscovered resources to be encountered.

Although there is the possibility that previously undiscovered resources could be encountered by subsurface earthwork activities, the implementation of standard construction mitigation measures would ensure that undiscovered cultural resources are not adversely affected by project-related construction activities, which would prevent the destruction or degradation of potentially significant cultural resources in the project vicinity. Given the low potential for disruption, and the comprehensiveness of mitigation measures that would apply to this project and those in the vicinity, the residual, insignificant impacts of the projects would not combine to make a significant cumulative impact and, even if the combined impact was significant because of substantial resources

on a different project site, the proposed project would not make a cumulatively considerable contribution given previous disruptions to its ground and the lack of any known resource within its boundaries.

Geology/Soils

The geographic scope of the cumulative geology, soils, and seismicity analysis is the project vicinity. Adverse effects associated with geologic, soil, and seismic hazards tend to be localized, and the area near the project boundaries would be the area most affected by project activities (generally within a 0.25-mile radius).

Development projects in the project vicinity may have the potential to be exposed to seismic hazards. However, there is a less than significant potential of the projects in combination to expose people or structure to substantial adverse effects, including the risk of loss, injury, or death in the event of a major earthquake; fault rupture; ground shaking; seismic-related ground failure; landslide; or liquefaction. There are no active or potentially act faults in the City or project area, and although the project boundaries might be exposed to strong ground shaking during an earthquake from faults that lie further afield, continued construction of buildings and other structures consistent with current development codes would minimize the potential for severe damage and loss of life. Seismic design criteria account for peak ground acceleration, soil profile, and other site conditions, and they establish corresponding design standards intended primarily to protect public safety and secondly to minimize property damage.

Regarding soil erosion, groundbreaking could lead to increased erosion rates on site soils, which could cause unstable ground surfaces and increased sedimentation in nearby streams and drainage channels. However, project construction activities would implement standard stormwater pollution prevention mitigation measures to ensure that earthwork activities do not result in substantial erosion off-site. This mitigation, in turn, would have to comply with the National Pollution Discharge Elimination System (NPDES) stormwater permitting program, which regulates water quality originating from construction sites. The NPDES program, which governs projects statewide (and nationwide), requires the preparation and implementation of Stormwater Pollution Prevention Programs for construction activities that disturb more than 1 acre, and the implementation of Best Management Practices that ensure the reduction of pollutants during stormwater discharges, as well as compliance with all applicable water quality requirements. Thus, given the proposed Master Plans and nearby projects would have to comply with federal and state regulations that are designed to minimize impacts to projects on a wide geographic scale, this project would make no cumulatively considerable contribution to any significant cumulative impact.

Greenhouse Gas Emissions

The geographic scope of the cumulative greenhouse gas emissions analysis is the San Francisco Bay Air Basin, which encompasses all or portions of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma counties. Greenhouse gas emissions are regarded as a regional issue; therefore, this would be the area most likely to be impacted by project emissions.

Other projects would emit new greenhouse gas emissions. The proposed project was found to not exceed the adopted greenhouse gas emissions per capita and, therefore, would not have a

significant unavoidable impact. Other projects would also be required to meet this target. The proposed project would not have a related cumulative considerable impact.

The State of California and the City of Santa Rosa have adopted greenhouse gas emissions reduction strategies that are predicated on reducing VMT, energy conservation, and using non-carbon based forms of energy. The proposed project was found to be consistent with all applicable greenhouse gas reduction strategies. Other projects would be assessed for consistency with applicable greenhouse gas reduction strategies and implement appropriate ones as necessary. Therefore, the proposed project would not contribute to a cumulatively considerable greenhouse gas emissions impact.

Noise

The geographic scope of the cumulative noise analysis is the project vicinity, including surrounding sensitive receptors. Noise impacts tend to be localized because ambient noise generally tends to dissipate within 0.25 mile, and existing noise from roadways tends to have a canceling effect on noise emanating from the project boundaries; that is, the logarithmic properties of noise and distance usually mean there are no additive effects. Therefore, the area near the project site (generally 0.25 mile) would be the area most affected by project activities.

Construction activities associated with the proposed project would result in substantial sources of noise. The construction activities for proposed project would not exceed the noise thresholds for any receivers. The timing of construction activities associated with other development projects would overlap minimally, if at all, with the proposed project. Furthermore, because noise is a highly localized phenomenon, even if construction activities did overlap in time with the proposed project, the intervening distance and roadway noise would diminish any additive effects. Construction activities at these other planned and approved projects would be required to take place during daytime hours, and the City and project applicant would be required to evaluate construction noise impacts and implement mitigation, if necessary, to minimize noise impacts. Given these distances and the intervening structures and vegetation, no significant cumulative construction noise impact would be expected. Therefore, it is reasonable to conclude that construction noise from the proposed project would not combine with noise from other development projects to cause cumulatively considerable noise impacts.

The proposed project's construction and operational vibration levels would not exceed annoyance thresholds. Because vibration propagates in waves through the soil, multiple pieces of equipment operating simultaneously would each produce vibration waves in different phases that typically would not increase the magnitude of the vibration. Furthermore, vibration is a highly localized phenomenon, and tends to dissipate to insignificant levels within dozens of feet; thus, there would be no possibility for vibration associated with the project to combine with vibration from other projects because of their distances from the project boundaries. Therefore, the proposed project would not contribute to a cumulatively considerable vibration impact.

The proposed project's vehicular trips would not make a substantial incremental contribution to ambient noise levels. These noise levels account for existing vehicle trips as well as vehicle trips from future projects. Other projects would be required to evaluate roadway noise and, if necessary, mitigate for such impacts. The proposed project's contribution to off-site vehicular noise levels

would not exceed the applicable thresholds of significance, which take into account the existing noise levels and future without project noise levels. Thus, the proposed project would not contribute to a cumulatively considerable increase in ambient roadway noise.

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

Less than significant impact. Impacts related to biological resources, cultural resources, geology, hazards, noise, traffic, and tribal resources were identified. With implementation of mitigation measures, all identified impacts would be reduced to less than significant levels; therefore, the proposed project would not cause substantial adverse effects on human beings.

Mitigation Measures

Implement MM AIR-1, MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, MM BIO-5, MM BIO-6, MM BIO-7, MM CUL-1, MM CUL-2, MM CUL-3, MM NOI-1, and MM TRANS-1.

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Mitigation Monitoring and Reporting Program for the Good Onward / 3192 Juniper Avenue Project Draft Initial Study/Mitigated Negative Declaration City of Santa Rosa, Sonoma County, California

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PREFACE

Section 21081.6 of the California Environmental Quality Act (CEQA) and CEQA Guidelines Section 15097 require a Lead Agency to adopt a Mitigation Monitoring and Reporting Program (MMRP) whenever it adopts a Mitigated Negative Declaration (MND) in conjunction with a project approval. The purpose of the MMRP is to ensure compliance with the mitigation measures occurs during project implementation.

The Initial Study and Mitigated Negative Declaration (IS/MND) prepared for the Good Onward / 3192 Juniper Avenue Project concluded that project implementation could result in potentially significant effects on the environment and mitigation measures were incorporated into the proposed project or are required as a condition of project approval that reduce these potential impacts to a less than significant level. This MMRP documents how and when the mitigation measures adopted by the lead agency will be implemented and confirms that potential environmental impacts are reduced to less than significant levels as identified in the MND.

This document does not discuss those subjects that the environmental analysis demonstrates would result in less than significant impacts and for which no mitigation was proposed or necessary.

Table 1: Good Onward / 3192 Juniper Avenue Project Mitigation Monitoring and Reporting Program

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
3. Air Quality					
MM AIR-1: During construction activities, the following air pollution control measures shall be implemented: • Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All roadways, driveways, and sidewalks shall be paved as soon as possible. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. • A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.	Notes on construction plans; Site inspection	During construction	City of Santa Rosa		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
4. Biological Resources					
MM BIO-1: If vegetation removal occurs during the breeding season (February 1 to August 31), a qualified biologist shall conduct nesting bird surveys to determine if any active nests are present and establish a no-work buffer zone around the nest until young have fledged or the nest is no longer active. The first survey should be conducted at least within 7 days prior to the beginning of construction activities, and an additional survey conducted within 48 hours prior to the start of construction activities. If there is a lapse of 7 days or longer in construction activities, another focused survey should be conducted. Additional surveys for raptors may be necessary especially surveys earlier in the nesting season to document early signs of nesting when raptors are more conspicuous. Once a nest is no longer active, work may be conducted without restriction within the buffer zone. This mitigation measure does not apply if vegetation removal occurs outside the breeding season (September 1 to January 31).	Submittal of documentation; Site inspection; Notes on construction plans	No sooner than 7 days prior to construction activities between February 1 to August 31; This mitigation measure does not apply between September 1 and January 31	City of Santa Rosa		
MM BIO-2: A qualified Biologist, experienced in raptor behavior, should be required to monitor the behavior of any raptors nesting within disturbance distance of Project activities. The qualified Biologist should have authority to order the cessation of all Project activities within disturbance distance of any raptor nest if the birds exhibit abnormal nesting behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young).	As needed, based on outcome of MM BIO-1; Site monitoring by qualified biologist; Notes on construction plans	As needed, based on outcome of MM BIO-1. Monitoring would occur during construction if active raptor nesting is identified. This mitigation measure does not apply between September 1 and January 31	City of Santa Rosa		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
MM BIO-3: To compensate for the loss of potential CTS habitat, the Applicant shall purchase CTS habitat conservation credits at an agency-approved mitigation bank or create suitable mitigation habitat on-site, in accordance with the requirements of the Santa Rosa Plain Conservation Strategy.	Submittal of documentation	Prior to grading permit issuance	City of Santa Rosa		
MM BIO-4: A trained biological monitor shall be present at all times when ground disturbance work is in progress at the project site. A USFWS–approved biologist will be responsible for appropriate training of the monitor. A record of all CTS observed, and the outcome of that observation, shall be kept by the biologist and submitted to USFWS. If the biologist has requested a stop work order due to take of any listed species, USFWS and CDFW shall be notified within one working day via email or telephone. All food and food–related trash items shall be sealed in trash containers and will be removed completely from the site once every three days. All equipment shall be maintained such that no leaks of automotive fluids such as gasoline, oils, or solvents will occur. Hazardous materials shall be stored in sealable containers in a designated location at least 200 feet from aquatic habitats. Construction workers shall attend a training session by a biologist before work is started. After the initial training session, all new personnel will also be given a training session. This training session will include pictures of CTS, information on the biology of CTS, the measures required to protect CTS, federal and state regulations, and what to do if CTS is found. If CTS are found on the project site by a construction worker, the worker will immediately inform the biological monitor. All work will halt immediately, and machinery turned off within 100 feet of the CTS. The biologist shall capture and remove the CTS from the work area. Before the start of work each morning, the biological monitor will check for CTS under any equipment such as vehicles and stored pipes.	Notes on construction plans; Site inspection	During ground disturbance	City of Santa Rosa		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
MM BIO-5: To compensate for the loss of potentially suitable but not occupied habitat for Sebastopol meadowfoam, Sonoma sunshine, and Burke's goldfields, the applicant shall either create suitable habitat on-site, or purchase wetland creation credits from an agency-approved mitigation bank and shall also purchase Sebastopol Meadowfoam/CTS habitat establishment and preservation credits at an agency-approved mitigation bank.	Submittal of documentation	Prior to grading permit issuance	City of Santa Rosa		
MM BIO-6: Prior to grading permit issuance, or any ground disturbing activities, applicant shall provide evidence to the City of Santa Rosa of meeting all mitigation requirements as required by the USACE, the North Coast RWQCB, and the CDFW per the Clean Water Act Section 401 and Section 404, as well as the Endangered Species Act Section 7 permitting processes.	Submittal of documentation	Prior to grading permit issuance	City of Santa Rosa		
MM BIO-7: Prior to tree removal, applicant shall obtain a permit for such activities from the City of Santa Rosa pursuant to Zoning Ordinance Section 17-24.030. During construction, the applicant shall protect retained trees in accordance with the provisions of the permit. The applicant shall plant replacement trees required by the permit by the time of project occupancy.	Issuance of permit; Notes on construction plans	Prior to tree removal	City of Santa Rosa		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
5. Cultural and Tribal Cultural Resources					
MM CUL-1: In the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until a qualified archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology has evaluated the situation. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction activities shall be recorded on appropriate Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified archaeologist. Potentially significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. If the resource is determined to be significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the CEQA Guidelines. The archaeologist shall also perform appropriate technical analyses, prepare a comprehensive report complete with methods, results, and recommendations, and provide for the permanent curation or repatriation of the recovered resources in cooperation with the designated Most Likely Descendant (MLD) as needed. The report shall be submitted to the City of Santa Rosa, the Northwest Information Center, and the State Historic Preservation Office (SHPO), if required.	Notes on construction plans; Site inspection	During construction	City of Santa Rosa		
MM CUL-2: In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public	Notes on construction plans; Site inspection	During construction	City of Santa Rosa		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
Resources Code Section 5097.94, and Section 5097.98 must be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken: 1. There shall be no further excavation or disturbance within 100 feet of the remains until the Sonoma County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the most likely descendant of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. 2. Where the following conditions occur, the landowner or his or her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project site in a location not subject to further subsurface disturbance: • The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being notified by the commission. • The descendant identified fails to make a recommendation. • The landowner or his authorized representative rejects					

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner. Additionally, California Public Resources Code Section 15064.5 requires the following relative to Native American Remains: • When an initial study identifies the existence of, or the probable likelihood of, Native American Remains within a project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code Section 5097.98. The applicant may develop a plan for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American Burials with the appropriate Native Americans as identified by the Native American Heritage Commission.					
7. Geology and Soils					
MM GEO-1: In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted. The project contractor shall notify a qualified paleontologist to examine the discovery. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If the applicant determines that	Notes on construction plans; Site inspection	During construction	City of Santa Rosa		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the City of Santa Rosa for review and approval prior to implementation, and the applicant shall adhere to the recommendations in the plan.					
10. Hydrology and Water Quality					
MM HYD-1: Prior to issuance of demolition permits for the proposed project, the City of Santa Rosa shall verify that the applicant has prepared a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. The SWPPP shall be designed to address the following objectives: (1) all pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled; (2) where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges (e.g., chemicals) are identified and either eliminated, controlled, or treated; (3) site Best Management Practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and (4) stabilization BMPs installed to reduce or eliminate pollutants after construction are completed. The SWPPP shall be prepared by a qualified SWPPP developer. The SWPPP shall include the minimum BMPs required for the identified Risk Level. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site BMPs Manual.	Approval of SWPPP; Notes on construction plans	Prior to issuance of demolition permits	City of Santa Rosa		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
MM HYD-2: Prior to issuance of building permits for the proposed project, the City of Santa Rosa shall verify that the project applicant has prepared operational stormwater quality control measures that comply with the requirements of the current Municipal Regional Permit. Responsibilities include but are not limited to designing BMPs into project features and operations to reduce potential impacts to surface water quality and to manage changes in the timing and quantity of runoff (i.e., hydromodification) associated with operation of the project. These features shall be included in the design-level drainage plan and final development drawings. Specifically, the final design shall include measures designed to mitigate potential water quality degradation and hydromodification of runoff from all portions of completed developments. Low Impact Development features—including minimizing disturbed areas and impervious cover and then infiltrating, storing, detaining, evapotranspiring, or biotreating stormwater runoff close to its source—shall be used at each development covered by the Municipal Regional Permit. Funding for long-term maintenance of all BMPs must be specified. For each development project, the project sponsor shall establish a self-perpetuating Operation and Maintenance of Stormwater Treatment Systems plan (Municipal Regional Permit provision C.3.h). This plan shall specify a regular inspection schedule of stormwater treatment facilities in accordance with the requirements of the Municipal Regional Permit. Reports documenting inspections and any remedial action conducted shall be submitted regularly to the City for review and approval.	Approval of plans; Notes on construction plans; Site inspection	Prior to issuance of building permits	City of Santa Rosa		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
13. Noise					
MM NOI-1: During construction, the following noise abatement measures shall be implemented: The construction contractor shall ensure that all internal combustion engine-driven equipment is equipped with mufflers that are in good condition and appropriate for the equipment. • The construction contractor shall ensure that unnecessary idling of internal combustion engines (i.e., idling in excess of 5 minutes) is prohibited. • The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists. • At all times during project grading and construction, the construction contractor shall ensure that stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from the nearest residential land uses. • The construction contractor shall designate a noise disturbance coordinator who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (starting too early, bad muffler, etc.) and establishment reasonable measures necessary to correct the problem. The construction contractor shall visibly post a telephone number for the disturbance coordinator at the construction site. • The construction contractor shall limit construction hours to standard city conditions of project approval. Standard city conditions limit the hours of construction from 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays. No construction is permitted on Sundays and holidays.	Notes on construction plans; Site inspection	During construction	City of Santa Rosa		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
17. Transportation					
MM TRANS-1: Prior to issuance of the certificate of occupancy for the Phase 2 warehouse, the applicant shall install half-width improvements along the Juniper Avenue frontage in accordance with the applicable General Plan street section. The City of Santa Rosa shall determine that the roadway has been improved in accordance with the applicable design standard prior to issuing the certificate of occupancy.	Site inspection	Prior to issuance of the certificate of occupancy for the Phase 2 warehouse	City of Santa Rosa		