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Mercedes-Benz of Santa Rosa
Vehicle Storage Facility
Environmental Analysis
January 21, 2022
Revised June 7, 2022

Streamlined Environmental Review

This environmental review focuses on the potential project-specific significant effects that are peculiar to the Mercedes-Benz of Santa Rosa Vehicle Storage Facility (the "Project") or its site. This type of streamlined environmental review is set forth in the California Environmental Quality Act ("CEQA") Guidelines Section 15183(a) and (c) and the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Environmental Impact Report (the "Specific Plan EIR")[1]

The Specific Plan EIR evaluated the environmental impacts of the Roseland Area / Sebastopol Road Specific Plan (the "Specific Plan") and includes annexation of five unincorporated County islands in southwest Santa Rosa. The Specific Plan provides an overall vision for future development within the Plan Area (which includes the Project site), a land use diagram, circulation plan, and infrastructure improvement plan as well as goals and policies to guide development and redevelopment.

Specific Plan EIR Section 1.3 Intended Uses of the EIR states in part that "the analysis included in this EIR may also be relied upon in conjunction with the City's consideration of future development proposals, as summarized below.

> "As provided under CEQA Guidelines Section 15183(a) and (c), future projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified does not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects that are peculiar to the project or its site. Upon adoption of the General Plan and zoning amendments, the City may rely upon this EIR to streamline the environmental review of future projects, provided they are consistent with the approved specific plan and zoning."

CEQA Guidelines Section 15183(a) adds, "This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies."

The following discussion demonstrates how the Project meets the conditions set forth above, notably A) Project consistency with the Specific Plan, Santa Rosa General Plan

[1] The Council of the City of Santa Rosa adopted Resolution No. 28873 on October 18, 2016, certifying the Final Specific Plan EIR and adopting a Mitigation Monitoring and Reporting Program.

2035 (the "General Plan") and the Santa Rosa Zoning Code; B) Project relationship with the General Plan EIR; and C) General Plan and zoning amendments that were adopted to achieve consistency with those certain portions of the Specific Plan that were changes from the General Plan.

Notably, the following analysis does not include a discussion of a community plan since the Specific Plan is not a community plan. As defined by CEQA Guidelines Section 15183(i), a community plan must contain all of the mandatory elements set forth in Government Code Section 65302. The Specific Plan does not contain all of the mandatory elements (i.e. conservation, open space, noise, and safety) and, therefore, does not qualify as a community plan for streamlining of environmental review pursuant to Section 152183.

Rather, streamlining is applicable to the Project because, as discussed below, the Project is consistent Specific Plan, the General Plan and the Zoning Code; the Specific Plan (and by extension the Project) are covered by the General Plan EIR; and as mentioned in the Specific EIR, the City Council adopted General Plan Amendments to make the General Plan consistent with the Specific Plan.

A. **Project consistency with the Specific Plan, General Plan and Zoning Code.** The Project is consistent with the development density and policies of the Specific Plan, General Plan and Zoning Code, as set forth in detail *Mercedes-Benz of Santa Rosa Vehicle Storage Facility Consistency Analysis, January 21, 2022 Revised June 7, 2022* (attached). In summary, The Project is consistent with the Light Industry land use classification of the General Plan and the Specific Plan as well as goals and policies that foster economic development, support businesses and employment, and that reduce greenhouse gas emissions, traffic reduction, noise, and (through mitigation) protect high quality wetlands and habitats. Additionally, the Site is zoned IL – Light Industrial in the Santa Rosa City Code Title 20 Zoning (the "Zoning Code"). The Light Industrial Zoning District is consistent with the Light Industry land use classification of the General Plan and Specific Plan. As defined in the Zoning Code, Vehicle Storage is "A service facility for the long-term storage of operative cars, trucks, buses, recreational vehicles, and other motor vehicles, for clients." A Minor Conditional Use Permit (MUP) is required for vehicle storage in the IL Zoning District.

B. **Relationship of the Project with the General Plan EIR.** The Project site is located within the Specific Plan area and was, therefore, evaluated by the Specific Plan EIR. In turn, as described in Specific Plan EIR Section 1.4, the entirety of the Specific Plan area is within the planning area evaluated by General Plan EIR. Additionally, the Specific Plan EIR incorporates the relevant parts of the General Plan EIR by reference. Because the General Plan EIR covers the Specific Plan area, inclusive of the Project site, and because the

relevant portions of the General Plan EIR are incorporated by reference into the Specific Plan EIR, the Project has been evaluated by the General Plan EIR.

Specific Plan EIR Section 1.4 Relationship to the City of Santa Rosa General Plan and EIR states:

> "The City certified the General Plan EIR (State Clearinghouse No. 2008092114) on November 3, 2009. The EIR evaluated the potential environmental effects of buildout of the city in accordance with the General Plan. The proposed Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Projects are within the planning area evaluated in the General Plan EIR. This Draft EIR uses technical information and analyses from the General Plan EIR that is relevant to the consideration of environmental effects of the proposed project, as provided by CEQA Guidelines Section 15150 [Incorporation by Reference])."

C. **General Plan and Zoning Amendments.** As noted in Specific Plan EIR Section 2.2, Project Background, "The proposed project [i.e., the Specific Plan] would be generally consistent with the General Plan 2035 with a few exceptions, which are shown on the proposed land plan (see Figure 2.0-7) as 'areas of change.'" The seven areas of change are described in detail in EIR Section 2.4, Project Characteristics.

The 2017 Annual Review of the General Plan summarizes actions taken by the City Council to adopt the Specific Plan, certify the Specific Plan EIR and amend other documents to achieve consistency with the Specific Plan.

> "On October 18, 2016 the City Council unanimously approved the Roseland Area/Sebastopol Road Specific Plan and associated amendments to the General Plan, Zoning Code and Bicycle and Pedestrian Master Plan, and certified a program level Environmental Impact Report [the Final Specific Plan EIR]. Subsequently, City staff discovered minor clerical errors in the General Plan land use amendment resolution table and the rezoning and prezoning ordinance tables.
>
> "Specifically, three properties located on W. Hearn Avenue, which were intended to be included in the General Plan land use amendment from Low Density Residential to Very Low Density Residential, were inadvertently left off the resolution table. On January 31, 2017, the City Council approved the General Plan Amendment and Rezoning to correct these clerical errors."

In summary, the Project is consistent with the Specific Plan, General Plan and Zoning Code. The Project site was evaluated the Specific Plan EIR and the General Plan EIR

(which covers the Specific Plan area). Applicable parts of the General Plan EIR were incorporated by reference into the Specific Plan EIR. The City Council adopted amendments to the General Plan, Zoning Code and Bicycle and Pedestrian Master Plan when it adopted the Specific Plan and certified the Specific Plan EIR to make all the documents consistent.

As a result, the Project meets the conditions set forth in in the Specific Plan EIR Section 1.3, which states that "the City may rely upon this EIR to streamline the environmental review of future projects, provided they are consistent with the approved specific plan and zoning" and which further states that the Specific Plan EIR "does not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects that are peculiar to the project or its site."

To streamline the review and reduce the need to prepare repetitive environmental studies, this environmental analysis, therefore, focuses on potential project-specific significant effects.

Environmental Review Summary

As described above, the Project area is within the planning area of the Specific Plan and within the scope of the previously certified Specific Plan EIR and General Plan EIR. The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified as well as the land use plan and policies of the Specific Plan. Therefore, pursuant to the Specific Plan EIR Sections 1.3 and 1.4, together with CEQA Guidelines Section 15183, the Project does not require additional environmental review, except to examine potential project-specific significant effects that are peculiar to the Project or site.

This environmental review focuses on the effects found to be potentially significant in the Specific Plan EIR and which may be peculiar to the Project or site, such as traffic, hazardous site conditions, cultural resources, wetlands, and endangered plants and animals. The significant impacts and mitigations identified in the Specific Plan EIR are set forth in the City of Santa Rosa Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Mitigation Monitoring and Reporting Program SCH No. 2016012030, prepared by Michael Baker International, August 2016 (the "Mitigation Monitoring and Reporting Program") (attached).

For the Project, studies were prepared by subject matter experts to determine potential impacts to cultural resources, wetlands and biological resources as a result of the Project, and a Phase 1 Environmental Site Assessment was prepared to document any potential hazardous site conditions.

The following summarizes potential environmental effects of the Project:

- Traffic and related impacts. The Project reduces vehicle miles driven every month, which reduces air, traffic and noise impacts as well as potential for accidents, thereby increasing traffic safety. This is an environmental benefit.

- Hazardous site conditions. No identified recognized environmental conditions or *de minimis* conditions are present at the Site.

- Cultural resources. No cultural resources of significance were identified at the Site. Mitigations are included in the event that archaeological artifacts or human remains are encountered during earth disturbing activities.

- Wetlands and endangered plants. The Site has seasonal wetlands which have been degraded by past disturbances and which do not contain and special-status plant species. However, the seasonal wetlands are still considered suitable habitat for federally listed vernal pool plant species: Sebastopol meadowfoam, Sonoma sunshine and Burke's goldfields. Mitigation is required in accordance with the Programmatic Biological Opinion ("PBO") for impacts to these federally endangered plants. Wetlands and endangered plants mitigation credits were purchased.

- California tiger salamander. The Site does not provide suitable California tiger salamander breeding habitat but provides potential suitable aestivation habitat despite barriers to migration by surround urban development. Mitigation is required in accordance with the Programmatic Biological Opinion ("PBO") for impacts to endangered CTS habitat. CTS habitat Mitigation credits were purchased.

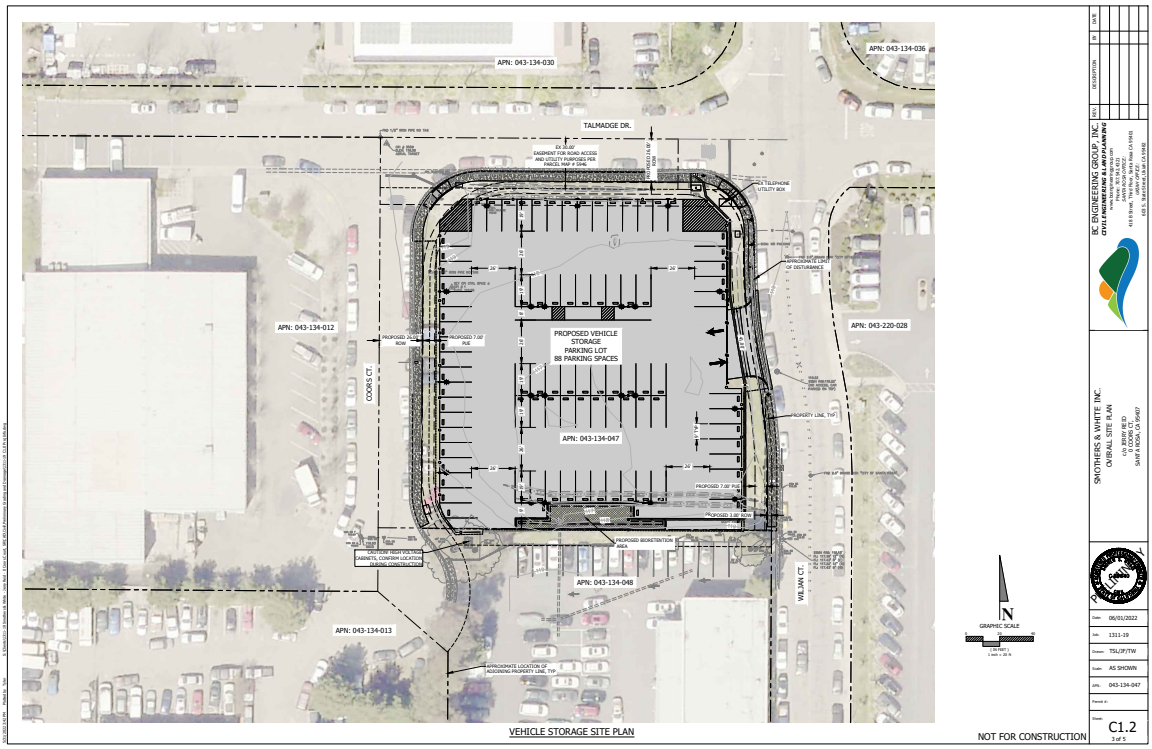
- Nesting Birds. Site development has the potential to impact native nesting birds, if construction activities are initiated during bird nesting season, which is February 1 through August 31.

The Project will implement all applicable mitigations set forth in the Mitigation Monitoring and Reporting Program as well as the mitigations for potential significant effects which are peculiar to the project.

Project Description

As shown in Figure 1, the Project is a vehicle storage facility for 88 vehicles on a 1.18-acre parcel, composed of an asphalt parking area; a landscaped bioretention area along a portion of the southern property line; new landscaping along Talmadge Drive, Wiljan Court and Coors Court; sidewalks along the three street frontages; a 6-foot black chain-link perimeter security fencing; owner controlled entry/exit gate on Wiljan Court; security lighting; and address signage. No parking signs will be posted on Wiljan Court north of the parking access to Talmadge and south of the parking access for 20 feet.

Figure 1. Project Site Plan



The site is located at 0 Coors Court, bordered by Coors Court to the west, Talmage Drive to the north, Wiljan Court to the east, and the parking lot of the auto collision center to the south in the city of Santa Rosa, Sonoma County, California, Assessor's Parcel # 043-134-047, near the Mercedes-Benz of Santa Rosa dealership showroom on Corby Avenue and directly across Wiljan Ct. from the dealership's Service Center (the "Site"). The Project will support the dealership.

Context

The Site is located within the planning area of the Specific Plan within the auto row area of Santa Rosa along Corby Avenue and Dowd Drive / Wiljan Court. The Project is similar to auto storage facilities for other dealerships in the vicinity, notably north of the Project Site. Figure 2 shows the vicinity of the Project Site, and Figure 4 shows the Site and surrounding land uses.

Figure 2: Site Vicinity Aerial

The Site is designated Light Industrial on the Land Use Classification Graphic of both the Specific Plan and Santa Rosa General Plan 2035 (the "General Plan") (see Figure 3). Properties in the vicinity to the north west and south are also designated General Industry. Properties to the east are designated Retail and Business Service.

The Site is zoned IL – Light Industrial in the Santa Rosa City Code Title 20 Zoning (the "Zoning Code"). The Light Industrial Zoning District is consistent with the Light Industry General Plan land use classification.

As demonstrated in the accompanying Mercedes-Benz of Santa Rosa Vehicle Storage Facility Consistency Analysis, the Project is consistent with the land use diagram, goals and policies of the General Plan and Specific Plan and with the Zoning Code. No amendments are required.

Figure 3. General Plan Land Use Classification

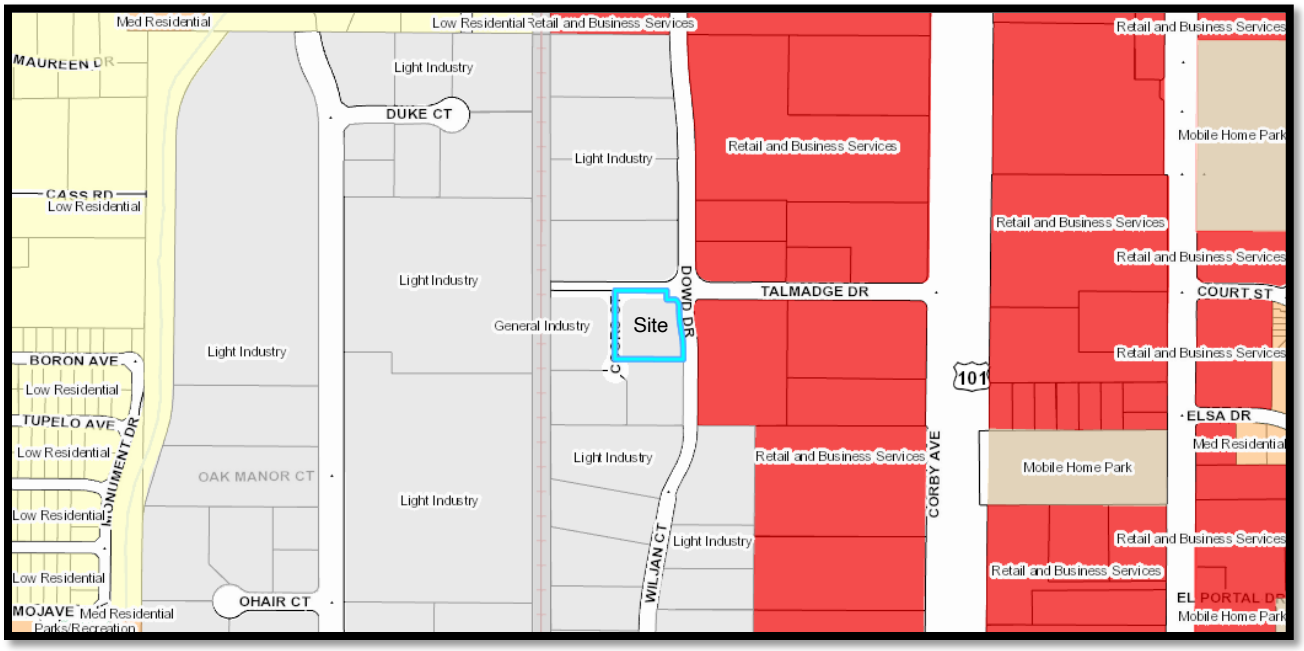


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Figure 4. Site Aerial

Environmental Analysis

The Project is within the scope of the previously certified EIR in that the use is consistent with the development density established by existing zoning, community plan (the Specific Plan), or general plan policies for which an EIR was certified. Therefore, the Project does not require additional environmental review, except to examine potential project-specific significant effects that are peculiar to the Project or Site.

The following is a summary of the cultural resources evaluation, wetlands delineation, biological assessments and a Phase 1 Environmental Site Assessment that were prepared to examine the specific effects of the Project and to provide recommended project-specific mitigations.

Environmental Mitigations include applicable mitigations set forth in the EIR Mitigation Monitoring Program as well as the project-specific mitigations.

Traffic and Related Impacts

The purpose of the Project is to enhance the operation of the nearby existing Mercedes Benz of Santa Rosa auto dealership by locating dealership vehicles close to the dealership's showroom and service center. When vehicle inventory exceeds storage capacity, the dealership needs to rely on off-site storage lots on south Santa Rosa Avenue, approximately 2.5 miles away. Two employees need to travel by car approximately 10 minutes to the remote storage lot. With no traffic or other delays, it takes at least 80 minutes of employee time driving 15 vehicle miles to bring one car from the remote lot to the dealership campus on auto row and back. At normal operation, 60 vehicles are stored at the remote lot.

The Project provides a vehicle storage facility at the dealership campus, thereby eliminating all of the vehicle trips to shuttle vehicles between the remote vehicle storage facility and the dealership campus. The Project, therefore, reduces vehicle miles driven every month, which reduces air, traffic and noise impacts as well as potential for accidents, thereby increasing traffic safety. This is an environmental benefit.

Cultural Resources Study

A Cultural Resources Evaluation of the Proposed Gravel Vehicular Storage Parking Lot at 0 Coors Court, Santa Rosa, Sonoma County, California (APN 043-134-047), submitted By Andrew Von Pinnon, M.A., Archaeological Resource Service Submitted for Smothers European, Care of Dino Bonos of Bonos Land Planning October 1, 2021 A.R.S. Project 21-033

Archaeological Resource Service conducted an archaeological evaluation of the Site including:

- A check of information on file within its office and with the Regional Office of the California Historical Resources Information System, to determine the presence or absence of previously recorded historic or prehistoric cultural resources;

- A check of appropriate historic references to determine the potential for historic era archaeological deposits;

- Contact with the Native American Heritage Commission to determine the presence or absence of listed Sacred Lands within the project area;

- Contact with all appropriate Native American organizations or individuals designated by the Native American Heritage Commission as interested parties for the project area;

- A surface reconnaissance of all accessible parts of the project area to locate any visible signs of potentially significant historic or prehistoric cultural deposits; and

- Preparation of a report describing the work accomplished, the results of the research, and making appropriate recommendations for further action, if warranted.

Archaeological Resource Service determined that the Site "does not contain any archaeological resources that warrant a finding of significance, nor will the proposed project have any impact upon the known archaeological resources of the area. As such, further archaeological investigation is not warranted at this time."

The report provides recommendations if a concentration of artifacts over fifty years in age or if human remains are encountered during earth disturbing activities. The recommendations align with the mitigations set forth in the Mitigation Monitoring and Reporting Program.

Phase 1 Environmental Site Assessment

Phase I Environmental Site Assessment, 0 Coors Court, Santa Rosa, California 95401, Prepared by Essel Environmental Engineering and Consulting, February 12, 2019

Essel Environmental engineering and Consulting ("Essel") prepared a Phase I Environmental Site Assessment ("ESA") to identify recognized environmental conditions in connection with the previous and current uses and ownership of the Site. Recognized environmental conditions are defined as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment."

The Phase I ESA did identify any recognized environmental conditions.

- No recognized environmental condition is identified in connection with the Site.
- No controlled recognized environmental condition is associated with the Site.
- No historical recognized environmental condition is present in connection with the Site.
- No *de minimis* environmental condition is present in connection with the Site.

Wetlands Delineation

Aquatic Resources Delineation, 0 Coors Court, Santa Rosa, Sonoma County, California, prepared by LSA, 157 Park Place, Pt. Richmond, California 94801, August 2019.

LSA completed a delineation of potential jurisdictional aquatic resources for the Site and found that approximately 0.203 acre of isolated seasonal wetlands are located on the Site (see Figure 5).

LSA noted that the hydrology of the Site "appears to be significantly disturbed by adjacent development and frequent vehicle traffic on the site. Deep tire ruts are present." Additionally, the report noted that soil samples "included gravelly fill, indicating past disturbance of the area, potentially as a result from construction of the surrounding roads." (See Figure 4.)

Preliminary Jurisdictional Determination for the 0 Coors Court Site, Pursuant to Section 404 of the Clean Water Act, prepared by Bryan Matsumoto, Senior Project Manager, Regulatory Division, Department of the Army, February 10, 2020.

The Preliminary Jurisdictional Determination confirmed the LSA delineation of 0.203 acre of wetlands on the Site and that the wetlands may be subject to US Army Corps of Engineers' regulatory authority under Section 404 of the Clean Water Act of 1972, as amended.

Endangered Species Consultation Bryan Matsumoto, Senior Project Manager, Regulatory Division, Department of the Army, Letter to Ryan Olah, United States Fish and Wildlife Service Endangered Species Division, October 26, 2021.

The Corps of Engineers initiated formal Section 7 consultation with the US Fish and Wildlife Service for impacts caused by the Project to three endangered plants and California tiger salamander upon receipt of application from Wiemeyer Ecological Sciences for a permit pursuant to Section 404 of the Clean Water Act of 1972, as amended, 33 U.S.C. § 1344 et seq., to construct a the Project.

Biological Assessments

Biological Resources Assessment, 0 Coors Court (APN 043-134-047) Santa Rosa, Sonoma County, prepared by Dan Sidle, LSA, 157 Park Place, Pt. Richmond, California 94801, February 21, 2019.

LSA determined that the Site is within the range of special status vegetation species and the endangered California tiger salamander as identified in the Santa Rosa Plain Conservation Strategy and Programmatic Biological Opinion.

LSA determined that the special status plants are not likely to occur on the Site due to prior disturbances but suggested that two years of botanical surveys may need to be conducted for federally-listed species.

LSA further determined that there is no suitable CTS breeding habitat present. On-site grasslands with gopher burrows may support suitable upland habitat, but distance from breeding grounds and urban barriers make it unlikely that California tiger salamander would utilize the Site as upland habitat. The Project "would not alter Critical Habitat for California tiger salamanders or the long-term conservation value of the site….Therefore, the project does not have the potential to adversely affect Critical Habitat for the Sonoma County Distinct Population Segment of California tiger salamander."

However, LSA suggests that mitigation credits may need to be purchased for both plants and California tiger salamander habitat.

Lastly, the LSA noted that state-protected white-tailed kite "is not known to nest near the site, but suitable nesting habitat is present in trees near the site." The subsequent biological assessment performed by Wiemeyer Ecological Sciences found no suitable nesting habitat for any special-status raptors including white-tailed kite.

Figure 5. LSA Wetland Delineation

Biological Assessment, Smother's European 0 Coors Court Santa Rosa, CA, prepared by Darren Wiemeyer, Wiemeyer Ecological Sciences, 4000 Montgomery Drive, Suite L-5, Santa Rosa, CA 95405, August 3, 2021

Wiemeyer Ecological Sciences ("Wiemeyer") performed site visits on April 8, May 5 and July 17, 2020 and March 26, April 29 and May 16, 2021, to perform (1) protocol level special-status plant species surveys in accordance with state and federal plant survey protocols; (2) special-status animal species habitat assessments, (3) a California tiger salamander ("CTS") habitat assessment, (4) plant inventories and (5) wildlife inventories. The survey dates were "at the time of year when rare or endangered species are both 'evident' and identifiable".

In summary, the Site has seasonal wetlands which have been degraded by past disturbances and which do not contain and special-status plant species. However, the seasonal wetlands are still considered suitable habitat for federally listed vernal pool plant species: Sebastopol meadowfoam (*Limnanthes vinculans*), Sonoma sunshine (*Blennosperma bakeri*) and Burke's goldfields (*Lasthenia burkei*). Plant habitat mitigation is required at a 1.5:1 habitat mitigation ratio in accordance with the Programmatic Biological Opinion ("PBO")[2] for these federally endangered plants. Wetlands mitigation will be required at a ratio of 1:1. The plant and wetlands mitigations are based upon the LSA delineation of 0.203 acres of wetlands. Mitigation credits were purchased for wetlands and for the endangered plants.

The Site is within the potential range of the California tiger salamander as mapped by the United States Fish and Wildlife Service and set forth in the Santa Rosa Plain Conservation Strategy and is within the listed critical habitat for California tiger salamander (Federal Register, 2011)[3].

The Site does not provide suitable California tiger salamander ("CTS") (*Ambystoma californiense*) breeding habitat due to lack of sufficient water depth and duration as well as site degradation including deep tire ruts (see Figure 4).

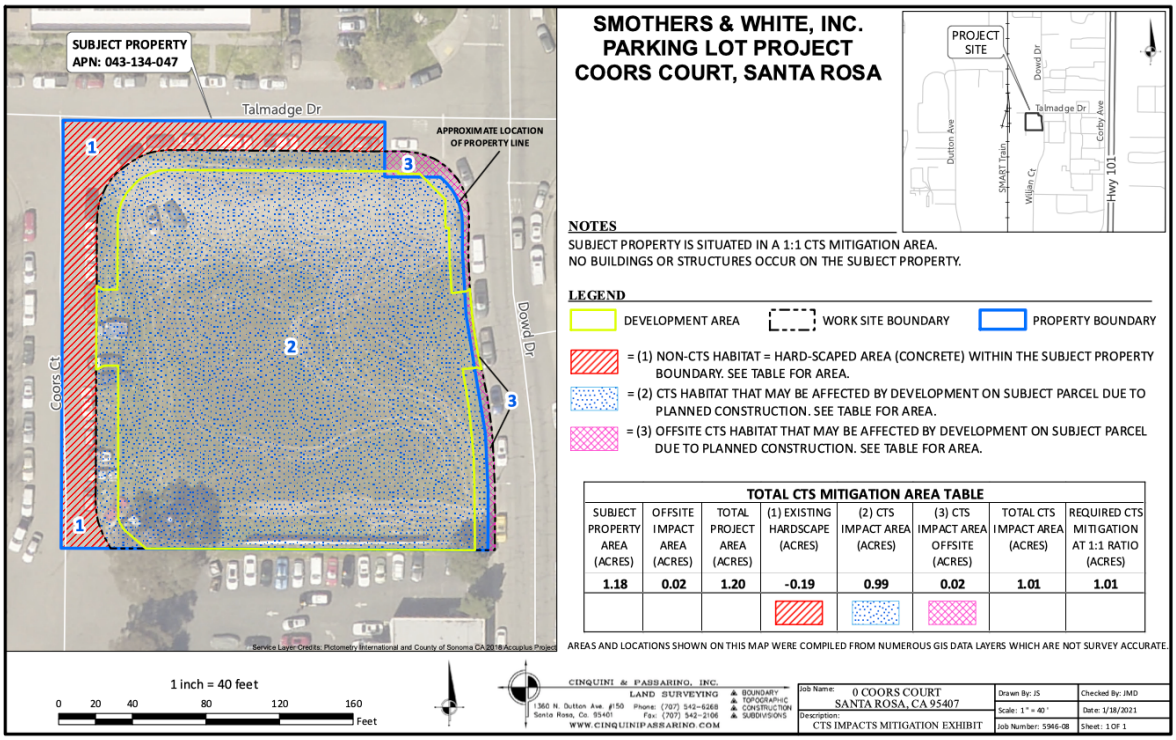
The Site provides potential upland CTS aestivation habitat. Wiemeyer determined that "there is no likelihood that CTS utilize habitats at the [S]ite" because the Site is completely isolated from larger undeveloped grassland

[2] Programmatic Biological Opinion - Reinitiation of Formal Consultation of Issuance of Clean Water Act, Section 404 Permits by the U.S. Army Corps of Engineers (Corps) on the Santa Rosa Plain, Sonoma County, California dated June 11, 2020.

[3] Federal Register. 2011. 76 FR 54346 54372. 50 CFR Part 17. Endangered and Threatened Wildlife and Plants; Revised Designation of Critical Habitat for the Sonoma County Distinct Population Segment of California Tiger Salamander; Final Rule.

habitat and because urban development of adjacent lands would be considered a significant barrier to the movement of CTS." Therefore, "there is no chance of 'take' of this species under the state definition. However, because the site has been identified as 'May adversely affect listed plants and would likely adversely affect CTS' according to the PBO (USFWS, 2020) and because the site provides suitable upland aestivation habitat for CTS, habitat mitigation is required at a ratio of 1:1 based on a determination of 1.01 acres of potential CTS habitat (see (Figure 6 below). CTS habitat mitigation credits were purchased.

Figure 6. Wiemeyer Ecological Sciences California tiger salamander habitat



Wiemeyer further determined that if construction activities are initiated during bird nesting season, the proposed Project has the potential to impact native ground nesting birds although the Site provides no suitable nesting habitat for any special-status raptors, including but not limited to white-tailed kite (*Elanus leucurus*).

Potential Impacts

Wiemeyer determined that the proposed Project will result in the following specific impacts:

(1) Loss of non-native annual grassland habitat and 0.203- acres of seasonal wetland habitat at the Site (per LSA delineation and confirmation by the Corps of Engineers) and loss of 0.203-acres of suitable seasonal wetland habitat for federally endangered vernal pool plant species.

(2) Loss of 1.01-acres of suitable upland aestivation habitat for California tiger salamander.

(3) Potential to impact native ground nesting birds if construction activities are initiated during bird nesting season.

401 Water Quality Certification Tier 3 Alternatives Analysis - Smothers European Long Term Vehicle Storage Facility 0 Coors Court, Santa Rosa, CA - Prepared By: Darren Wiemeyer, Wiemeyer Ecological Sciences, 4000 Montgomery Drive, Suite L-5, April 21, 2022

Wiemeyer also prepared a Tier 3 Alternatives Analysis pursuant to Section 401 of the Clean Water Act. He analyzed four alternatives in order to identify the Least Environmentally Damaging Practicable Alternative (LEDPA). An alternative is practicable, as cited in the analysis, if it is "available and capable of being done after taking into consideration cost, technology, and logistics in light of the overall project purpose."

Alternatives analyzed include:

- Alternative 1: No Action Alternative – This alternative results in no impacts, but it does not achieve the overall project purpose.

- Alternative 2: Offsite Project Site Alternatives – The identified offsite alternative that meets the project needs was unable to be purchased by the applicant and development of this site would result in significantly more permanent impacts to seasonal wetlands at the site.

- Alternative 3: Proposed Original Project Alternative – This alternative satisfies the project purpose and results in loss of 0.203 acres of seasonal wetlands, 0.203 acres of suitable habitat for Sonoma sunshine and Sebastopol meadowfoam, and 1.01 acres of suitable upland aestivation habitat for California tiger salamander.

- Alternative 4: Reduced On-Site Alternative – This alternative reduces the the size of the development area from 1.01 acres to 0.64 acres in an effort to decrease the amount of permanent impacts to seasonal wetland habitat at the Site from 0.203 acres to approximately 0.15 acres depending on site development. It further isolates the seasonal wetlands that would remain on the parcel, which is impractical for the small acreage of the Site and the fact that this parcel is completely isolated from larger undeveloped open space land. This alternative also reduces the number of parking spaces and, therefore, does not meet the project need.

Wiemeyer determines that Alternative 3, the Proposed Original Project Alternative, met screening for practicability and was found to be in compliance with the restrictions on discharge in accordance with Appendix A of the Procedures (Section 230.10). Alternative 3, the Original Project alternative, was found to comply with the Guidelines because it is the LEDPA that would have the least adverse effect on the aquatic ecosystem while not having other serious adverse environmental consequences.

To compensate for the impacts associated with the Proposed Original Project Alternative, Wiemeyer states that applicant has purchased the following mitigation credits to compensate for the impacts to plant and wildlife habitat: the purchase of 0.25-acres of seasonal wetland habitat at the Laguna Valley Mitigation Bank; the purchase of 0.16-acres of Sonoma sunshine plant mitigation at the Desmond Mitigation Bank; the purchase of 0.16-acres of Sebastopol meadowfoam plant mitigation at the Swift/Turner Conservation Bank and the Margaret West Conservation Bank; and the purchase of 1.01-acres of California tiger salamander mitigation at the Swift/Turner Conservation Bank.

Wiemeyer notes that as a result of these habitat mitigations, there will be an overall increase in the functions and values of seasonal wetland/vernal pool habitat on the Santa Rosa Plain. In addition, there will be an increase in habitat quality of suitable habitat for Sonoma sunshine and Sebastopol meadowfoam and an increase in habitat quality of suitable upland aestivation habitat for California tiger salamander.

Mitigation Measures

The Project will comply with and implement the applicable mitigations set forth in the EIR Mitigation Monitoring and Reporting Program as well as specific wetlands and biological mitigations.

Mitigation Monitoring Table

This table shows the Mitigation Measure from the Mitigation Monitoring and Reporting Program, the applicability of each mitigation to the Project and a discussion.

Project-specific wetlands and biological mitigations are referenced in the Mitigation Monitoring Table and set forth below it.

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Mercedes-Benz of Santa Rosa Vehicle Storage Facility Mitigation Monitoring Table			
Mitigation Measure	**Applicability to Project**	**Summary of Mitigation Measure**	**Discussion**
Air Quality			
MM 3.3.3	Applicable	Where projects in the project area are subject to subsequent CEQA review, the City of Santa Rosa must ensure that in addition to the BAAQMD basic construction mitigation measures from Table 8-1 of the BAAQMD CEQA Air Quality Guidelines (or subsequent updates), BAAQMD additional mitigation measures from Table 8-2 of the BAAQMD CEQA Air Quality Guidelines (or subsequent updates) are noted on the construction documents and implemented. These measures include the following: 1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. 2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity. 4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. 5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction	The Project will incorporate construction-related air quality mitigations set forth in MM 3.3.3 on construction documents and implement the mitigation measures.

		activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. 6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel. 8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. 9. Minimizing the idling time of diesel powered construction equipment to two minutes. 10. The project shall develop a plan demonstrating that the off- road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet- average 20 percent NOX reduction and 45 percent PM reduction compared to the most recent CARB fleet average. 11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings). 12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. 13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.	

MM 3.3.5	Not Applicable	Projects within the project area that have a construction area greater than 5 acres and which are scheduled to last more than two years shall be required to prepare a site-specific construction pollutant mitigation plan in consultation with Bay Area Air Quality Management District (BAAQMD) staff prior to the issuance of grading permits. A project-specific construction- related dispersion model acceptable to the BAAQMD shall be used to identify potential toxic air contaminant impacts, including diesel particulate matter. If BAAQMD risk thresholds (i.e., probability of contracting cancer is greater than 10 in one million) would be exceeded, mitigation measures shall be identified in the construction pollutant mitigation plan to address potential impacts and shall be based on site-specific information, such as the distance to the nearest sensitive receptors, project site plan details, and construction schedule. The City shall ensure construction contracts include all identified measures. Construction pollutant mitigation plan measures shall include but not be limited to limiting the amount of acreage to be graded in a single day, requiring the use of advanced particulate filters on construction equipment, and requiring the use of alternative fuels, such as biodiesel, to power construction equipment.	The Mitigation Measure is applicable to projects with a construction area greater than 5 acres. The Site is less than 2 acres. Therefore, MM 3.3.5 is not applicable to the Project.

MM 3.3.6	Not Applicable	The following measures shall be utilized in site planning and building designs to reduce TAC and PM2.5 exposure where new receptors are located within 1,000 feet of emissions sources: • Future development in the project area that includes sensitive receptors (such as residences, schools, hospitals, daycare centers, or retirement homes) located within 1,000 feet of US 101 and/or stationary sources shall require site-specific analysis to determine the level of health risk. This analysis shall be conducted following procedures outlined by the BAAQMD. If the site-specific analysis reveals significant exposures from all sources (i.e., health risk in terms of excess cancer risk greater than 100 in one million, acute or chronic hazards with a hazard Index greater than 10, or annual PM2.5 exposures greater than 0.8 µg/m3), measures shall be employed to reduce the risk to below the threshold (e.g., electrostatic filtering systems or equivalent systems and location of vents away from TAC sources). • Future nonresidential developments projected to generate more than 100 heavy-duty truck trips daily and/or include the need for a BAAQMD permit to operate a stationary source shall include measures to protect public health to ensure they do not cause a significant health risk in terms of excess cancer risk greater than 10 in one million, acute or chronic hazards with a Hazard Index greater than 1.0, or annual PM2.5 exposures greater than 0.3 µg/m3.	The Mitigation Measure is applicable to 1) projects that locate new sensitive receptors (such as residences, schools, hospitals, daycare centers, or retirement homes) within 1,000 feet of emissions sources or 2) projects that generate more than 100 heavy-duty truck trips daily and/or include the need for a BAAQMD permit to operate a stationary source. The Project is a vehicle storage facility and does not involve new receptors, nor generate more than 100 daily heavy-duty truck trips, nor require a stationary source permit from BAAQMD. Therefore, MM 3.3.6 is not applicable to the Project.

Mercedes-Benz of Santa Rosa Vehicle Storage Facility Mitigation Monitoring Table			
Mitigation Measure	**Applicability to Project**	**Summary of Mitigation Measure**	**Discussion**
Biological Resources			
MM 3.4.1a	Applicable	Implement General Plan Mitigation Measure4.F-5: The City of Santa Rosa shall incorporate the avoidance and mitigation measures described in the Santa Rosa Plain Conservation Strategy and the USFWS Programmatic Biological Opinion, as conditions of approval for development in or near areas with suitable habitat for California tiger salamander, Burke's goldfields, Sonoma sunshine, Sebastopol meadowfoam, and manyflowered navarretia. However, in accordance with the USFWS Programmatic Biological Opinion, projects within the Southwest Santa Rosa Preserve System will be evaluated individually and mitigation may not necessarily adhere to the ratios described in the Conservation Strategy.	The Project mitigates for impacts to 0.203 acres of seasonal wetlands and 0.203 acres of habitat for endangered plant's Burke's goldfields, Sonoma sunshine, Sebastopol meadowfoam and impacts to 1.01 acres upland aestivation habitat for California tiger salamander. See below: ***Wetlands and Project-Specific Biological Mitigations:*** • Impact 1 LOSS OF 0.203-ACRES OF SEASONAL WETLAND HABITAT AND SUITABLE FEDERALLY ENDANGERED PLANT HABITAT and Mitigation Measures 1.1 – 1.5; and • Impact 2 LOSS OF 1.01-ACRES OF SUITABLE UPLAND AESTIVATION HABITAT FOR CALIFORNIA TIGER SALAMANDER and Mitigation Measures 2.1 – 2.2.
MM 3.4.1b	Applicable	If there is the potential for destruction of a nest or substantial disturbance to nesting birds or bats due to construction activities, a plan to monitor nesting birds or bats during construction shall be prepared and submitted to the USFWS and CDFG for review and approval. The City	The Project potentially impacts native ground nesting birds if construction activities are initiated during bird nesting season. See below: ***Wetlands and Project-Specific Biological Mitigations:***

		shall comply with all USFWS or CDFG guidance for protection of nesting birds. If vegetation, buildings, or bridges that potentially provide nesting sites must be removed, a qualified wildlife biologist shall conduct pre-construction surveys. If an active bird nest is found, the bird shall be identified as to species and the approximate distance from the closest work site to the nest estimated. No additional measures need be implemented if active nests are more than the following distances from the nearest work site: (a) 300 feet for raptors; or (b) 75 feet for other non-special-status bird species. Disturbance of active nests shall be avoided to the extent possible until it is determined that nesting is complete and the young have fledged. Bats shall be absent or flushed from roost locations prior to demolition of buildings. If flushing of bats from buildings is necessary, it shall be done by a qualified biologist during the non-breeding season from October 1 to March 31. When flushing bats, structures shall be moved carefully to avoid harming individuals, and torpid bats given time to completely arouse and fly away. During the maternity season from April 1 to September 30, prior to building demolition or construction, a qualified biologist shall determine if a bat nursery is present at any sites identified as potentially housing bats. If an active nursery is present, disturbance of bats shall be avoided until the biologist determines that breeding is complete and young are reared.	Impact 3 CONSTRUCTION ACTIVITIES MAY IMPACT NESTING BIRDS and Mitigation Measure 3.1
MM 3.4.2a	Applicable	Implement Mitigation Measure 3.4.1a and 3.4.1b	See Discussion of MM 3.4.1a and MM 3.4.1b above

MM 3.4.2b	Applicable	A formal wetland delineation shall be conducted for areas that will be permanently or temporarily impacted by the project. If jurisdictional waters cannot be avoided, the City shall apply for a CWA Section 404 permit from the USACE and a Section 401 permit from the RWQCB. These permits shall be obtained prior to issuance of grading permits and implementation of the proposed project. The City shall ensure that the project will result in no net loss of waters of the U.S. by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact, as determined in the CWA Section 404/401 permits. Compensatory mitigation may consist of (a) obtaining credits from a mitigation bank; (b) making a payment to an in-lieu fee program that will conduct wetland, stream, or other aquatic resource restoration, creation, enhancement, or preservation activities (these programs are generally administered by government agencies or nonprofit organizations that have established an agreement with the regulatory agencies to use in- lieu fee payments collected from permit applicants); and/or (c) providing compensatory mitigation through an aquatic resource restoration, establishment, enhancement, and/or preservation activity. This last type of compensatory mitigation may be provided at or adjacent to the impact site (i.e., on-site mitigation) or at another location, usually within the same watershed as the permitted impact (i.e., off-site mitigation). The project proponent/permit applicant retains responsibility for the implementation and success of the mitigation project. Evidence of compliance with this mitigation measure shall be provided prior to construction and grading activities for the proposed project.	The Project mitigates for impacts to 0.203 acres of seasonal wetlands. See below: *Wetlands and Project-Specific Biological Mitigations:* Impact 1 LOSS OF 0.203-ACRES OF SEASONAL WETLAND HABITAT AND SUITABLE FEDERALLY ENDANGERED PLANT HABITAT and Mitigation Measures 1.1 – 1.5.

Mercedes-Benz of Santa Rosa Vehicle Storage Facility Mitigation Monitoring Table			
Mitigation Measure	**Applicability to Project**	**Summary of Mitigation Measure**	**Discussion**
Cultural Resources			
MM 3.5.2a	Applicable	Phase 1 Archaeological Resource Study. When specific projects are proposed within the project area that involve ground- disturbing activity, a site-specific Phase I archaeological resource study shall be performed by a qualified archaeologist or equivalent cultural resources professional that will include an updated records search, pedestrian survey of the project area, development of a historic context, sensitivity assessment for buried prehistoric deposits, and preparation of a technical report that meets federal and state requirements. If significant or unique resources are identified and cannot be avoided, treatment plans will be developed in consultation with the City and appropriate Native American representatives to mitigate potential impacts to less than significant based on the provisions of Public Resources Code Section 21083.2.	A Phase I archaeological resource study was performed by a qualified archaeologist. No cultural resources of significance were identified at the Site.
MM 3.5.2b	Applicable	Should any archaeological artifacts be discovered during construction of any project allowed under the Specific Plan, all construction activities shall be halted immediately within 50 feet of the discovery, the City shall be notified, and a professional archaeologist that meets the Secretary of the Interior's Standards and Guidelines for Professional Qualifications in archaeology and/or history shall be retained to determine the significance of the discovery. The professional archaeologist shall prepare a plan to identify, record, report, evaluate, and recover the resources as necessary, which shall be implemented by the developer. Construction within the area of the discovery shall not	Consistent with the recommendation of the cultural resources study, this mitigation measure addresses discovery of archaeological artifacts during earth disturbing activities. The mitigation measure set forth in the cultural resources study address discovery of prehistoric artifacts or a concentration of historic artifacts (over fifty years in age) (for example, outhouse shafts or trash pits).

		recommence until impacts on the archaeological resource are mitigated as described in Mitigation Measure MM 3.5.2a. Additionally, Public Resources Code Section 5097.993 stipulates that a project sponsor must inform project personnel that collection of any Native American artifacts is prohibited by law.	
MM 3.5.3a	Applicable	Implement Mitigation Measure MM 3.5.2a (Phase 1 Archaeological Resource Study).	See Discussion of MM 3.5.2a.
MM 3.5.3b	Applicable	Should human remains be discovered during construction of any project allowed under the Specific Plan, all construction activities shall be halted immediately within 50 feet of the discovery, the City shall be notified, and the Sonoma County Coroner shall be notified, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed.	Consistent with the recommendation of the cultural resources study, this mitigation measure addresses discovery of human remains during earth disturbing activities.

Mercedes-Benz of Santa Rosa Vehicle Storage Facility Mitigation Monitoring Table			
Mitigation Measure	**Applicability to Project**	**Summary of Mitigation Measure**	**Discussion**
Hazards and Hazardous Materials			
MM 3.8.4a	Applicable	Phase I Environmental Site Assessment. Developers shall be required to complete a Phase I environmental site assessment for each property to be developed or redeveloped. If a Recognized Environmental Condition (REC) is identified in a Phase I environmental site assessment, a Phase II environmental site assessment shall be prepared to determine whether conditions are present that require remediation or other controls to minimize the potential for hazardous materials contamination to adversely affect public health and the environment. If remediation is required, developers shall complete site remediation in accordance with OSHA standards and Santa Rosa Fire Department, Sonoma County Environmental Health Department, and State Water Resources Control Board guidelines. The Department of Toxic Substances Control (DTSC) may become involved wherever toxic levels of contaminants are found that pose an immediate hazard. Remediation shall reduce human exposure risk and environmental hazards, both during and after construction. The remediation plan shall be prepared in accordance with the environmental consultant's recommendations and established procedures for safe remediation. Specific mitigation measures designed to protect human health and the environment will be provided in the plan. Requirements shall include but not be limited to the following:	A Phase 1 Environmental Site Assessment was prepared by Essel Environmental engineering and Consulting to identify recognized environmental conditions in connection with the previous and current uses and ownership of the Site. No recognized environmental conditions were identified. • No recognized environmental condition is identified in connection with the Site. • No controlled recognized environmental condition is associated with the Site. • No historical recognized environmental condition is present in connection with the Site. • No *de minimis* environmental condition is present in connection with the Site.

		• Documentation of the extent of previous environmental investigation and remediation at the site, including closure reports for underground storage tanks (USTs) and contaminant concentrations. • A site-specific health and safety plan to be prepared by all contractors at the project site, where applicable. This includes a plan for all demolition, grading, and excavation on the site, as well as for future subsurface maintenance work. The plan shall include appropriate training, any required personal protective equipment, and monitoring of contaminants to determine exposure. The Health and Safety Plan shall be reviewed and approved by a certified industrial hygienist. • Description of protocols for the investigation and evaluation of previously unidentified hazardous materials that could be encountered during project development, including engineering controls that may be required to reduce exposure to construction workers and future users of the site. • Requirements for site-specific construction techniques that would minimize exposure to any subsurface contamination, where applicable, which shall include treatment and disposal measures for any contaminated groundwater removed from excavations, trenches, and dewatering systems in accordance with local and Regional Water Quality Control Board guidelines. • Sampling and testing plan for excavated soils to determine suitability for reuse or acceptability for disposal at a state- licensed landfill facility.	

		• Restrictions limiting future excavation or development of the subsurface by residents and visitors to the proposed development, and prohibition of groundwater development should it be determined from test results that contamination is present. The restrictions would be developed based on site-specific conditions and would reflect the requirements of the RWQCB and/or DTSC, depending on which agency is responsible for oversight of the particular site. Restrictions, which are sometimes also referred to as land use covenants, shall be recorded with the parcel(s), shall run with the land. The developer or land owner successor(s)-in-interest shall be responsible for ensuring development complies with the restrictions. Compliance with the restrictions must be demonstrated to the satisfaction of the City before a grading permit is issued.	

MM 3.8.4b	Applicable	In the event previously unknown contaminated soil, groundwater, or subsurface features are encountered or have the potential be present during ground-disturbing activities at any site, work shall cease immediately, and the developer's contractor shall notify the City of Santa Rosa Fire Department for further instruction. The City shall ensure any grading or improvement plan or building permit includes a statement specifying that if hazardous materials contamination is discovered or suspected during construction activities, all work shall stop immediately until the City of Santa Rosa Fire Department has determined an appropriate course of action. Such actions may include, but would not be limited to, site investigation, human health and environmental risk assessment, implementation of a health and safety plan, and remediation and/or site management controls. The City of Santa Rosa Fire Department shall be responsible for notifying the appropriate regulatory agencies and providing evidence to the City Planning and Economic Development Department that potential risks have been mitigated to the extent required by regulatory agencies. Work shall not recommence on an impacted site until the applicable regulatory agency has determined further work would not pose an unacceptable human health or environmental risk. Deed restrictions may be required as provided under mitigation measure MM 3.8.4a.	The Project will implement the safety and procedural protocols set forth in this mitigation measure in the event that previously unknown contaminated soil, groundwater, or subsurface features are encountered or have the potential be present during ground-disturbing activities at the Site.

Mercedes-Benz of Santa Rosa Vehicle Storage Facility Mitigation Monitoring Table			
Mitigation Measure	**Applicability to Project**	**Summary of Mitigation Measure**	**Discussion**
Traffic and Transportation			
MM 3.14.9	Applicable	Prior to construction activities, applicants seeking to construct projects in the project area shall submit a construction traffic control plan to the City of Santa Rosa for review and approval. The plan shall identify the timing and routing of all major construction-related traffic to avoid potential congestion and delays on the local street network. Any temporary road or sidewalk closures shall be identified along with detour plans for rerouting pedestrian and bicycle traffic for rerouting pedestrian and bicycle traffic. The plan shall also identify locations where transit service would be temporarily rerouted or transit stops moved, and these changes must be approved by the Santa Rosa CityBus and Sonoma County Transit before the plan is finalized. If necessary, movement of major construction equipment and materials shall be limited to off-peak hours to avoid conflicts with local traffic circulation.	The Project will implement a traffic control plan during Project construction.
MM 3.14.12	Not Applicable	The City shall widen the Dutton Avenue westbound off-ramp to extend the right turn pocket to a minimum length of 550 feet to alleviate the adverse queuing onto the mainline freeway. The City shall monitor queuing conditions on the ramp through field observations and review of development traffic impact studies and add the widening project to the Capital Improvement Program once it is determined that queues are likely to exceed storage within a five-year time frame. The City shall collaborate with Caltrans in obtaining approvals to complete the widening project.	This mitigation measure concerns the City's widening Dutton Avenue westbound off-ramp to extend the right turn pocket to a minimum length of 550 feet to alleviate the adverse queuing onto the mainline freeway. Therefore, MM 3.14.12 is not applicable to the Project.

Project-Specific Wetlands and Biological Mitigations

Implementation of the following recommended mitigation measures, in addition to any regulatory agency conditions, will result in a finding of less than significant impacts to biological resources as a result of site development for the Project.

IMPACT 1. LOSS OF 0.203-ACRES OF SEASONAL WETLAND HABITAT AND SUITABLE FEDERALLY ENDANGERED PLANT HABITAT

Site developments will result in the loss of 0.203-acres of seasonal wetland habitat. In addition, the 0.203-acres of seasonal wetland habitat is considered suitable habitat for federally endangered vernal pool plant habitat. The seasonal wetlands at the site would fall under the jurisdiction of the State Water Resources Control Board (SWRCB) and the United States Army Corps of Engineers (USACE) under the Clean Water Act.

Mitigation Measures

Mitigation 1.1. Obtain permit authorization from the USACE under the 404 Nationwide Permit Program for the loss of 0.203-acres of seasonal wetland habitat. Implement all agency permit conditions.

Mitigation 1.2. Obtain permit authorization from the SWRCB under the 401 Water Quality Certification Program for the loss of 0.203-acres of seasonal wetland habitat. Implement all agency permit conditions.

Mitigation 1.3. Request the USACE to append the project to the USFWS Programmatic Biological Opinion - Reinitiation of Formal Consultation of Issuance of Clean Water Act, Section 404 Permits by the U.S. Army Corps of Engineers (Corps) on the Santa Rosa Plain, Sonoma County, California dated June 11, 2020. Implement all conditions required by the USFWS under the Programmatic Biological Opinion.

Mitigation 1.4. Mitigate for the loss of 0.203-acres of seasonal wetland habitat through the purchase of seasonal wetland habitat credits at a 1:1 ratio at an agency approved wetland mitigation bank. (Wetland Mitigation Credits were purchased; see Attachment 9.)

Mitigation 1.5. Mitigate for the loss of 0.203-acres of suitable federally endangered vernal pool plant habitat through the purchase of federally endangered vernal pool plant species credits at a 1.5:1 mitigation ratio at an agency approved plant preservation bank. (Plant Habitat Mitigation Credits were purchased; see Attachment 10.)

IMPACT 2. LOSS OF 1.01-ACRES OF SUITABLE UPLAND AESTIVATION HABITAT FOR CALIFORNIA TIGER SALAMANDER

Site development will result in the loss of 1.01-acres of suitable upland aestivation habitat for California tiger salamander.

Mitigation Measures

Mitigation 2.1. Request the USACE to append the project to the USFWS Programmatic Biological Opinion - Reinitiation of Formal Consultation of Issuance of Clean Water Act, Section 404 Permits by the U.S. Army Corps of Engineers (Corps) on the Santa Rosa Plain, Sonoma County, California dated June 11, 2020. Implement all conditions required by the USFWS under the Programmatic Biological Opinion. Implement all conditions required by the USFWS under the Programmatic Biological Opinion.

Mitigation 2.2. Mitigate for the loss of 1.01-acres of suitable upland aestivation habitat for California tiger salamander at a 1:1 ratio at an agency approved California tiger salamander conservation bank. (California tiger salamander mitigation credits were purchased; see Attachment 10.)

IMPACT 3. CONSTRUCTION ACTIVITIES MAY IMPACT NESTING BIRDS

Site developments have the potential to impact native nesting birds, if construction activities are initiated during bird nesting season, which is February 1 through August 31.

Mitigation Measures

Mitigation 3.1.

A qualified biologist should perform a pre-construction survey for nesting birds within 5 days prior to ground-breaking at the site if construction activities will take place between February 1 and August 31. If nesting birds are found, the qualified biologist should establish suitable buffers prior to ground-breaking activities. To prevent encroachment, the established buffer(s) should be clearly marked by highly visibility material. The established buffer(s) should remain in effect until the young have fledged or the nest has been abandoned as confirmed by the qualified biologist.

Attachments

1. ***City of Santa Rosa Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Mitigation Monitoring and Reporting Program Sch No. 2016012030, prepared by Michael Baker International, August 2016***

2. ***A Cultural Resources Evaluation of the Proposed Gravel Vehicular Storage Parking Lot at 0 Coors Court, Santa Rosa, Sonoma County, California (APN 043-134-047), submitted By Andrew Von Pinnon, M.A., Archaeological Resource Service Submitted for Smothers European, Care of Dino Bonos of Bonos Land Planning October 1, 2021 A.R.S. Project 21-033***

3. ***Phase I Environmental Site Assessment, 0 Coors Court, Santa Rosa, California 95401, Prepared by Essel Environmental Engineering and Consulting, February 12, 2019***

4. ***Aquatic Resources Delineation, 0 Coors Court, Santa Rosa, Sonoma County, California, prepared by LSA, 157 Park Place, Pt. Richmond, California 94801, August 2019.***

5. ***Preliminary Jurisdictional Determination for the 0 Coors Court Site, Pursuant to Section 404 of the Clean Water Act, prepared by Bryan Matsumoto, Senior Project Manager, Regulatory Division, Department of the Army, February 10, 2020.***

6. ***Endangered Species Consultation Bryan Matsumoto, Senior Project Manager, Regulatory Division, Department of the Army, Letter to Ryan Olah, United States Fish and Wildlife Service Endangered Species Division, October 26, 2021.***

7. ***Biological Resources Assessment, 0 Coors Court (APN 043-134-047) Santa Rosa, Sonoma County, prepared by Dan Sidle, LSA, 157 Park Place, Pt. Richmond, California 94801, February 21, 2019.***

8. ***Biological Assessment, Smother's European 0 Coors Court Santa Rosa, CA, prepared by Darren Wiemeyer, Wiemeyer Ecological Sciences, 4000 Montgomery Drive, Suite L-5, Santa Rosa, CA 95405, August 3, 2021***

8.1 401 Water Quality Certification Tier 3 Alternatives Analysis - Smothers European Long Term Vehicle Storage Facility 0 Coors Court, Santa Rosa, CA - Prepared By: Darren Wiemeyer, Wiemeyer Ecological Sciences, 4000 Montgomery Drive, Suite L-5, April 21, 2022

9. ***Wetlands Mitigation Credits - Credit Sales Confirmation/Agreement for 0.25 acre of seasonal wetlands creation purchased on November 16, 2021, at the Laguna Valley Mitigation Bank.***

10. ***Plant Habitat and California Tiger Salamander Habitat Mitigation Credits – Bills of Sale and Payment receipts, (1) Davis Preserve, LLC, 0.05 acre of plant habitat credits and 0.05 acre of CTS habitat credits purchased January 10, 2022, in the Swift/Turner Conservation Bank and (2) 0.85 acre of CTS habitat credits purchased January 10, 2022, in the Swift/Turner Conservation Bank; (3) Margaret West Conservation Preserve, LLC, 0.11 acres of plant habitat credits and 0.11 acre of CTS habitat credits purchased on January 10, 2022, in the Margaret West Conservation Bank; and (4) Desmond Mitigation Bank, 0.16 acre of plant habitat credits purchase on January 11, 2022, in the Desmond Mitigation Bank.***

11. ***Mercedes-Benz of Santa Rosa Vehicle Storage Facility Consistency Analysis, January 21, 2022, Revised June 7, 2022.***