

ZONING AMENDMENT TO ALLOW RESIDENTIAL CARE
FACILITIES FOR THE ELDERLY WITHIN THE
CG – COMMERCIAL, GRAVENSTEIN CORRIDOR
ZONING DISTRICT

AND

RESIDENTIAL CARE FACILITY FOR THE ELDERLY &
COMMERCIAL BUILDING

ENVIRONMENTAL CHECKLIST AND INITIAL STUDY
MITIGATED NEGATIVE DECLARATION

PREPARED BY:



METROPOLITAN PLANNING GROUP
499 HUMBOLDT STREET
SANTA ROSA, CA 95404

JUNE 2019

M-GROUP

[PAGE INTENTIONALLY LEFT BLANK]

**ZONING AMENDMENT AND RESIDENTIAL CARE FACILITY FOR THE ELDERLY & COMMERCIAL BUILDING
CEQA ENVIRONMENTAL CHECKLIST AND INITIAL STUDY**

Project Title:	Zoning Amendment and Residential Care Facility for the Elderly (RCFE) & Commercial Building
Lead agency name and address:	City of Cotati Community Development Department 201 West Sierra Avenue Cotati, CA 94931
Contact person and phone number:	Jon-Paul Harries, Senior Planner 707-665-3634
Zoning Amendment to allow RCFE within CG Zoning District	
Project Location:	Parcels zoned as Commercial, Gravenstein Corridor (CG) city-wide
Description of project:	The proposed project includes a text amendment to Section 17.22.020 (Allowable Land Uses and Planning Permit Requirements) of the Cotati Municipal Code to allow Residential Care Facility for the Elderly (RCFE) within the CG Zoning District, with approval of a Use Permit.
Residential Care Facility for the Elderly & Commercial Building	
Project Location:	NW Corner of State Route 116 and Alder Avenue (APNs 144-040-011 and 144-040-021), City of Cotati, Sonoma County, CA
File Number:	PA#16/25 and PA#18/25
Project sponsor's name and address and Property Owners:	Steve Monahan Townsend Capital Partners LLC 1101 Fifth Avenue #300 San Rafael, CA 94901
General Plan Designation:	General Commercial
Zoning:	Commercial, Gravenstein Corridor (CG)
Description of project:	The proposed project includes a lot line adjustment and the construction of a 77,000-square-foot Assisted Living Facility with 88 units, a 24,100-square-foot Memory Care Facility with 34 units, and a 4,000-square-foot commercial building to be operated as a cannabis dispensary. The project includes loading areas, a paved parking area, rain garden/detention basins, a pedestrian plaza, sidewalks, and landscaping. A monument sign would be located at the corner of SR 116 and Alder Avenue. The project includes improvements to SR 116 and Alder Avenue.
Surrounding land uses and setting; briefly describe the project's surroundings:	The project site is surrounded by land designated as General Commercial to the north, east, south, and west. Medium Density Residential is located east of the project site, across Alder Avenue.
Other public agencies whose approval is required (e.g. permits, financial approval, or participation agreements):	U.S. Army Corps of Engineers, Regional Water Quality Control Board, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, Caltrans
Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?	The Federated Indians of Graton Rancheria (FIGR) was notified on January 14, 2019. The City of Cotati received an email from the FIGR on February 13, 2019, stating that they would review the project within 10 business days. The City has not received a request from FIGR for formal consultation.

[PAGE INTENTIONALLY LEFT BLANK]

TABLE OF CONTENTS**PAGE #**

1. INTRODUCTION	1
1.1. EXECUTIVE SUMMARY	1
1.2. INITIAL STUDY/MITIGATED NEGATIVE DECLARATION	1
1.3. CITY OF COTATI GENERAL PLAN AND EIR (TIERINIG)	1
1.4. 2001 SOUTH SONOMA BUSINESS PARK EIR + ADDENDA (TIERING)	2
2. PROJECT DESCRIPTION	2
2.1. ZONING AMENDMENT TO ALLOW RCFE WITHIN CG ZONING DISTRICT	2
2.2. RESIDENTIAL CARE FACILITY FOR THE ELDERLY & COMMERCIAL BUILDING	3
3. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED	17
4. DETERMINATION	18
5. EVALUATION OF ENVIRONMENTAL IMPACTS	19
5.1. AESTHETICS	19
5.2. AGRICULTURAL AND FORESTRY RESOURCES	21
5.3. AIR QUALITY	23
5.4. BIOLOGICAL RESOURCES	30
5.5. CULTURAL RESOURCES	41
5.6. ENERGY	45
5.7. GEOLOGY AND SOILS	49
5.8. GREENHOUSE GAS EMISSIONS	54
5.9. HAZARDS/HAZARDOUS MATERIALS	57
5.10. HYDROLOGY AND WATER QUALITY	62
5.11. LAND USE AND PLANNING	67
5.12. MINERAL RESOURCES	69
5.13. NOISE	70
5.14. POPULATION AND HOUSING	76
5.15. PUBLIC SERVICES	78
5.16. RECREATION	80
5.17. TRANSPORTATION	82
5.18. TRIBAL CULTURAL RESOURCES	90
5.19. UTILITIES AND SERVICE SYSTEMS	92
5.20. WILDFIRE	97
5.21. MANDATORY FINDINGS OF SIGNIFICANCE CAL. PUB. RES. CODE §15065)	99
6. REFERENCE DOCUMENTS	102
6.1. TECHNICAL APPENDICES	102
6.2. OTHER DOCUMENTS REFERENCED	103
7. MITIGATION MONITORING AND REPORTING PROGRAM	104

LIST OF FIGURES

FIGURE 1: CG ZONING DISTRICT	11
FIGURE 2: REGIONAL LOCATION.....	12
FIGURE 3: PROJECT VICINITY.....	13
FIGURE 4: GENERAL PLAN LAND USE	14
FIGURE 5: ZONING.....	15
FIGURE 5: SITE PLAN.....	16

LIST OF TABLES

TABLE 1: AIR QUALITY SIGNIFICANCE THRESHOLDS	24
TABLE 2: BAAQMD SCREENING CRITERIA FOR CONGREGATE CARE FACILITIES	26
TABLE 3: IMPACTS FROM COMBINED SOURCES AT CONSTRUCTION MEI.....	28
TABLE 4: BAAQMD GREENHOUSE GAS SCREENING.....	56
TABLE 5: VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT.....	74
TABLE 6: EXISTING PEAK HOUR INTERSECTION LOS	85
TABLE 7: BASELINE PEAK HOUR INTERSECTION LOS.....	85
TABLE 8: TRIP GENERATION SUMMARY.....	86
TABLE 9: TRIP DISTRIBUTION ASSUMPTIONS.....	86
TABLE 10: BASELINE AND BASELINE PLUS PROJECT PEAK HOUR INTERSECTION LOS.....	87
TABLE 11: TEN-YEAR HORIZON WITH AND WITHOUT PROJECT PM PEAK HOUR INTERSECTION LOS	88

APPENDICES

- A. SITE PLANS
- B. TREE PRESERVATION AND MITIGATION REPORT
- C. FIGURES C-1 THROUGH C-9
- D. EVALUATION OF AIR QUALITY AND GREENHOUSE GAS EMISSIONS
- E. BIOLOGICAL RESOURCES ANALYSIS
- F. CULTURAL RESOURCES STUDY
- G. GEOTECHNICAL FEASIBILITY EVALUATION
- H. INITIAL STORM WATER LOW IMPACT DEVELOPMENT SUBMITTAL
- I. NOISE EVALUATION
- J. FOCUSED TRAFFIC IMPACT ANALYSIS

ACRONYMS AND ABBREVIATIONS

AFY	acre feet a year
Air Basin	San Francisco Bay Area Air Basin
APN	Assessor Parcel Numbers
AQP	Air Quality Plan
APN	Assessor Parcel Number
ARB	California Air Resources
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CIP	Capital Improvement Program
CG	Commercial, Gravenstein Corridor (Cotati Zoning District)
CORP	Army Corps of Engineers
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CRHR	California Register of Historical Resources
CRPUSD	Cotati-Rohnert Park Unified School District
CTS	California Tiger Salamander
dBA	A-weighted decibel
DEIR	Draft Environmental Impact Report
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substance Control
EIR	Environmental Impact Report
FEIR	Final Environmental Impact Report
GHG	greenhouse gas
gpd	gallons per day per acre
HI	hazard index
HRA	Health Risk Assessment
HMBP	Hazardous Material Business Plan
IRWP	Incremental Recycled Water Program
IS/MND	Initial Study/Mitigated Negative Declaration

ITP	Incidental Take Permit
LID	Low Impact Development
LUST	Leaking Underground Storage Tank
LWWTP	Laguna Wastewater Treatment Plant
mgd	million gallons per day
MBTA	Migratory Bird Treaty Act
MEI	Maximum Exposed Individual
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OEHHA	California Office of Environmental Health Hazards Assessment
PPV	peak particle velocity
PRC	Public Resources Code
RCFE	Residential Care Facility for the Elderly
RAFD	Rancho Adobe Fire Protection District
RCPA	Regional Climate Protection Agency
ROG	Reactive Organic Gas
RWQCB	Regional Water Quality Control Board
SCH	State Clearinghouse
SCTA	Sonoma County Transportation Authority
SCWA	Sonoma County Water Agency
SR	State Route
SRPCS	Santa Rosa Plain Conservation Strategy
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
µg/m3	micrograms per cubic meter

1. INTRODUCTION

1.1. EXECUTIVE SUMMARY

The proposed project includes a text amendment to Section 17.22.020 of the Cotati Municipal Code to allow Residential Care Facilities for the Elderly (RCFE) within the Commercial, Gravenstein Corridor (CG) Zoning District; the RCFE uses would be allowed subject to the approval of a Use Permit. The proposed project includes the construction of an Assisted Living Facility, Memory Care Facility, and commercial building on a 5.63-acre site at the northwest corner of State Route (SR) 116 and Alder Avenue, as well as frontage improvements along SR 116 and Alder Avenue.

The City of Cotati prepared an Initial Study/Mitigated Negative Declaration that tiers from the 2013 Cotati General Plan Update EIR.

1.2. INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

This IS/MND was prepared by the City of Cotati, as the lead agency, pursuant to the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code Sections 21000 et. Seq.), the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3), and the Cotati Municipal Code.

This IS/MND describes the proposed project and its environmental setting, including the project site's existing conditions and applicable regulatory requirements. The IS/MND provides an assessment of the potential impacts to environmental resources that would result from implementation of the proposed project and includes mitigation measures to ensure that there would be no significant adverse impacts on the environment.

1.3. CITY OF COTATI GENERAL PLAN AND EIR (TIERING)

This IS/MND tiers from the 2013 Cotati General Plan Update EIR (SCH No. 2013082037), which was certified in March 2015, to examine site-specific impacts of the proposed project. All General Plan policies adopted as mitigation apply to the project analyzed herein. The General Plan EIR reviewed potentially significant environmental effects resulting from plan implementation and developed measures and policies to mitigate impacts. Nonetheless, significant and unavoidable impacts were determined to occur under the General Plan. Therefore, the City adopted a statement of overriding considerations, which balance the merits of approving the plan despite the significant environmental effects. The effects identified as significant and unavoidable in the General Plan EIR are:

Aesthetics

- Impact 3.1-1: Substantial Adverse Effects on Visual Character, including Scenic Vistas or Scenic Resources.
- Impact 4.1: Cumulative Degradation of the Existing Visual Character of the Region

Noise

- Impact 3.10-1: Traffic Noise Sources.
- Impact 3.10-7: Cumulative Noise Impacts
- Impact 4.11: Cumulative Exposure of Noise-Sensitive Land Uses to Noise in Excess of Normally Acceptable Noise Levels or to Substantial Increases in Noise.

Traffic

- Impact 3.12-1: Acceptable traffic operation at the study intersections and roadway segments controlled by the City of Cotati, though the ability to fully fund all identified improvements is uncertain.
- Impact 3.12-2: Acceptable traffic operation on Gravenstein Highway, though the funding and timing of improvements needed to accommodate regional and local growth on the highway is uncertain.
- Impact 3.12-3: Unacceptable operation on US 101 freeway facilities.

- Impact 4.13: Cumulative Impact on the Transportation Network.

Utilities

- Impact 3.13-3: Potential to exceed wastewater treatment capacity or the requirements of the RWQCB.
- Impact 4.14: Cumulative Impact on Utilities.

Other

- Impact 4.15: Irreversible Effects (Consumption of Nonrenewable Resources, Irretrievable Commitments, Irreversible Physical Changes).

A copy of the City of Cotati's General Plan and EIR are available at the Community Development Department, 201 West Sierra Avenue, Cotati, California 94931, during normal business hours and online at <http://cotati.generalplan.org/>.

1.4. 2001 SOUTH SONOMA BUSINESS PARK EIR + ADDENDA (TIERING)

This IS/MND also tiers from the 2001 South Sonoma Business Park (SSBP) EIR (SCH#2000052045), which was certified by the City of Cotati on June 13, 2001, and subsequent addenda. The SSBP EIR evaluated the impacts associated with 650,000 square feet of office and retail development on 35 acres bounded by Alder Avenue to the west, SR 116 to the south, Redwood Drive to the east, and Helman Drive to the north. The EIR also included an analysis of widening SR 116 to five lanes (2 lanes both east and west and 1 turning lane) and a signalized intersection at Alder Avenue. Alder Avenue, Helman Lane, and Redwood Drive widened was also evaluated in the SSBP EIR. Addendum #1 to the 2001 SSBP EIR was approved by City Council on December 22, 2003 and evaluated modifications to the Orchard Plan Alternative. Following certification of Addendum #1, a residential component of the project (Cotati Cottages - 46 dwelling units) was constructed in 2004. Public improvements to Alder Avenue were also constructed in 2004. Lowe's Home Improvement Store (165,382 square feet of retail) and 75,100 square feet of additional commercial space, all within the Cotati Commons Marketplace, were constructed in 2006. Addendum #2 to the 2001 SSBP EIR was prepared in November 2006 and evaluated the SR 116 Phase 2 Improvements within current and future Caltrans right-of-way.

A copy of the SSBP EIR and Addenda are available at the Community Development Department, 201 West Sierra Avenue, Cotati, California 94931, during normal business hours.

2. PROJECT DESCRIPTION

2.1. ZONING AMENDMENT TO ALLOW RCFE WITHIN CG ZONING DISTRICT

Residential Care Facilities for the Elderly (RCFE) are currently not allowed within the Commercial, Gravenstein Corridor (CG) Zoning District, per the Cotati Municipal Code. The proposed project includes an amendment to Section 17.22.020 (Allowable Land Uses and Planning Permit Requirements) of the Cotati Municipal Code to allow RCFE within the CG Zoning District; the use would be allowed subject to the approval of a Use Permit. Table 2-3: Allowed Land Uses and Permit Requirements for Mixed Use Corridors and Districts in Section 17.22.020 would be amended to add "Use Permit" to allow the RCFE land use within the CG Zoning District. **Figure 1: CG Zoning District**, shows all the parcels, city-wide, that are zoned as CG and subject to the proposed zoning text amendment.

All future development projects that seek to construct a RCFE within the CG Zoning District will be subject to a Use Permit and Design Review (Section 17.62.040), which are discretionary actions that trigger review in accordance with the California Environmental Quality Act (CEQA).

The subject zoning amendment is limited to an update to the Cotati Municipal Code to allow RCFE within the CG Zoning District. As an update to the City's Municipal Code, the proposed project does not grant any right that allows physical development. Rather, it establishes that a Use Permit shall be required to consider Residential Care Facilities for the Elderly within the CG Zoning District. In accordance with Section 17.62.050, development application subject to a Use Permit are considered by the Planning Commission.

2.2. RESIDENTIAL CARE FACILITY FOR THE ELDERLY & COMMERCIAL BUILDING

Project Location

The proposed project is located at the northwest corner of SR 116 (Gravenstein Highway) and Alder Avenue within the City of Cotati, Sonoma County, California (**Figure 2: Regional Location**). The 5.63-acre project site consists of two parcels, APN 144-040-011 and 144-040-021 (**Figure 3: Project Vicinity**).

General Plan and Zoning

The City of Cotati General Plan identifies the City's vision for the future and provides a framework that will guide decisions on growth, development, and conservation of open space and resources in a manner consistent with the quality of life desired by the City's residents and businesses. To ensure that this desired vision is realized, the General Plan has been designed to be internally consistent and cross-referenced with other documents, including the City's Zoning Ordinance. The project site exhibits a General Plan land use designation of General Commercial (**Figure 4: General Plan Land Use**).

The City of Cotati Zoning Ordinance implements the General Plan. Several different districts are identified in the Zoning Ordinance that are intended to, among other things, provide for a wide range of uses and implement the City's vision to conserve open space and resources. The project site is zoned Commercial, Gravenstein Corridor (**Figure 5: Zoning**). The current zoning designation allows commercial cannabis uses with a Commercial Cannabis Permit. With the proposed zoning text amendment included as part of this proposed project, Residential Care Facilities for the Elderly will be allowed within the Commercial, Gravenstein Corridor Zoning Designation, with a Use Permit.

Existing Conditions

State Route 116, which fronts the subject property, is a California state highway that is maintained by the California Department of Transportation (Caltrans), connecting US 101 in Cotati to SR 1 on the Sonoma Coast in Jenner. At the project site frontage SR 116 (Gravenstein Highway) is a two-lane road with a posted speed limit of 45 miles per hour (mph). Alder Avenue, which borders the subject property to the east, is a two-lane roadway that runs north-south, bound by Blodgett Street on the north and SR 116 on the south. Within the project vicinity Alder Avenue is approximately 28 feet wide and has a posted speed limit of 35 mph.

The project site currently contains several existing structures. The structures are unoccupied and include two single-family residences with detached garages, an old tavern, a workshop/barn structure, and a few small sheds located in the southeast corner of the property. Landscaping around the existing buildings include horticultural species such as cottonwood (*Populus sp.*), black walnut (*Juglans hindsii*), Mexican fan palm (*Washingtonia filifera*), blackwood acacia (*Acacia melanoxydon*), thuja (*Thuja sp.*), English ivy (*Hedera helix*) and periwinkle (*Vinca major*). Additionally, there are scattered native oaks that occur on the project site (*Quercus garryana* and *Q. lobata*). Due to the history of intensive site disturbance, only two distinct plant communities were identified on the project site: ruderal vegetation and seasonal wetlands.

Due to past cultivation of lavender fields and grading disturbance, very few native plant species remain on the project site. The remaining native plant species found in the ruderal vegetation community include California poppy (*Eschscholzia californica*), Spanish clover (*Acmispon americanus ssp. americanus*), willow herb (*Epilobium brachycarpum*), cleavers (*Galium aparine*), summer cottonweed (*Epilobium brachycarpum*) and creeping wildrye (*Elymus triticoides ssp. triticoides*). Weed abatement and plowing was performed from 2009 to 2012 on the project

site, but annual disking ceased when the tenant vacated the property in 2012. In mid-January 2018, as requested by the Rancho Adobe Fire District to minimize wildland fire hazards, the dry grass and weeds were removed, and the property disked. The weed abatement conducted in January 2018 did not impact the onsite sensitive biological resources including seasonal wetlands.¹

One seasonal wetland (0.06 acre) occurs in a slight topographic low area in the northern portion of the project site and is subject to the U.S. Army Corps of Engineers jurisdiction pursuant to Section 404 of the Clean Water Act. This low area remains saturated/inundated throughout the winter as indicated by the dominance of hydrophytic vegetation, presence of hydric soils and indicators of wetland hydrology (i.e. presence of standing water, saturation and oxidized rhizospheres). During large storm events, this seasonal wetland overflows and conveys water overland east to the drain inlet along Alder Avenue where it enters the City storm drain system. Formal rare plant surveys were conducted on the project site in 2015 and have occurred annually since (2015-2019). No special status plant species have been observed onsite.

The project site and vicinity are known to have supported California tiger salamander (CTS) (*Ambystoma californiense*) in the past and are located within the established Critical Habitat for the California tiger salamander. In 2001 the adjacent Sonoma Business Park project site was mass graded and all impacts to CTS were fully mitigated to the satisfaction of the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). In 2003/2004, as a subsequent phase of the Sonoma Business Park development, a CTS recovery/salvage project was carried out under the direction of the USFWS and the CDFW. The CTS recovery/salvage project included the translocation of individuals to the Gobbi Bank Site and the Alton Lane Conservation Preserve. A report summarizing the recovery/salvage project was submitted to the USFWS and CDFW in September 2007 titled *California Tiger Salamander Survey and Salvage Summary of the "Nibe" and "Reds" Project Site, Santa Rosa, California, September 20, 2007*. The subject project site is formerly known as the "Red's" Project Site. The report concluded that 12 adult CTS were captured on the Red's Project site and surrendered to CDFW for translocation. See additional discussion on CTS in Section 5.4 Biological Resources and Appendix E: Biological Resource Analysis.

Land uses surrounding the subject property include ruderal annual grassland and ranchette style housing to the north and an existing residential townhouse development (Cotati Cottages subdivision) to the northeast. Additional residential and commercial development is currently proposed and was previously evaluated in the South Sonoma Business Park EIR (SCH No. 2000052045) for the property directly east of the project site. To the south of the property, across SR 116, is Shamrock Materials, Inc., a business specializing in stone and concrete building supplies. The Cotati Large Animal Hospital and Cotati Small Animal Hospital are located directly west of the project site.

Project Description

The proposed project includes a lot line adjustment to expand APN 144-040-011 from 2.25 acres to 4.78 acres and reduce APN 144-040-021 from 3.37 acres to 0.84 acre. The proposed project includes the construction of an approximately 77,000-square-foot Assisted Living Facility, a 24,100-square-foot Memory Care Facility, and a 4,000-square-foot commercial building. The project also includes loading areas, a paved parking area, a rain garden/detention basin, a pedestrian plaza, sidewalks, and landscaping. A monument sign would be located at the corner of SR 116 and Alder Avenue. **Figure 6: Site Plan** shows the locations of proposed facilities onsite and the area of frontage improvements along State Route 116.

¹ Letter from Monk & Associates to City of Cotati, November 21, 2018.

New Structures

The proposed project site plan, architecture, preliminary improvement plans, and landscaping plans are provided in the Sterling Senior Communities Planning Re-Submittal dated December 3 and 5, 2018 (**Appendix A**) and include the following:

Assisted Living Facility

The 77,000-square-foot Assisted Living Facility would be located within the northeastern portion of the subject property and as proposed would contain 88 assisted living units, 14 of which would accommodate two beds. The units would range in size from 484 to 770 square feet and the facility would be able to accommodate up to 102 residents. The Assisted Living Facility would also include two internal landscaped courtyards, a dining hall, kitchen, laundry, library, living room, coffee shops, game rooms, theater, and an administrative office. The two-story facility would have a maximum height of 38 feet.

Memory Care Facility

The 24,100-square-foot Memory Care Facility would be located west of, and connected to, the Assisted Living Facility via two covered walkways and a courtyard. The Memory Care Facility would provide 34 units, approximately 450 square feet in size. Each unit would accommodate two beds; therefore, the facility will be able to accommodate up to 68 residents. The facility would contain an internal landscaped courtyard, two common areas, and an administrative office. The one-story facility would be 28 feet in height.

Commercial Building

The 4,000-square-foot commercial building would be located in the southwestern portion of the site, along the frontage of SR 116 and set back approximately 30 feet from the proposed property line. The one-story building would be approximately 17' 3" in height. The commercial building will house a Cannabis Dispensary.²

Architecture

The architectural design for the Assisted Living and Memory Care buildings would incorporate multi-paned windows, glass entrance doors, and covered entryways (Porte Cochères). The finish materials for the building façades include cement plaster with paint finish (earth-tone colors) and board and batten siding. Stacked stone would be incorporated into the building design to accentuate the building entryway. Roof materials are proposed to consist of asphalt shingles with standing seam metal at entryways.

The architectural design for the commercial building would incorporate multi-paned windows and glass entrance doors. The finish materials for the building façades include cement plaster with paint finish (earth-tone colors), board and batten siding, and stacked stone at the entrance. Roof material consists of asphalt shingles.

Frontage Improvements

Proposed frontage improvements include the following:

- A pedestrian plaza east of the commercial building with walkways and a trellis. The trellis would be approximately 9 feet high and include 8" x 8" stained wood finish posts
- Monument sign at the corner of SR 116 and Alder Avenue, 4'10" in height, with finish materials of cement plaster and stone veneer
- Concrete sidewalk, 6 feet in width, parallel to SR 116, and located within the 15.6-foot-wide proposed public sidewalk access easement, to be offered to the City of Cotati (see Sheet C2.0: Site Map)

² City Council approved dispensary license in June 2018.

- Dedication of approximately 19 feet along the site frontage of SR 116 to State of California for the planned future widening of SR 116 (see Sheet C2.0: Site Map)
- Construction of an approximately 250-foot eastbound left-turn taper from SR 116 to Alder Avenue
- Construction of a westbound right-turn taper from SR 116 to Alder Avenue
- Construction of frontage improvements along Alder Avenue including paving, striping, sidewalks, curbs and street parking
- Dedication of approximately 34 feet of right-of-way and ultimately up to 47 feet of right-of-way along the eastern boundary of the subject property to the City of Cotati to accommodate future construction of the cul-de-sac (see Sheet A-3: Proposed Future Site Plan)
- Dedication of a 36-foot-wide strip of land at the western property line for the future construction of a Public Street consistent with the City of Cotati General Plan

Access and Parking

In the near term, the project site will be accessed through a new 26-foot-wide asphalt concrete paved driveway from Alder Avenue. The driveway will lead to a new asphalt concrete paved parking lot that would provide a total of 118 new parking spaces for cars, two parking spaces for motorcycles, and 16 parking spaces for bicycles. Five of the parking spaces would be equipped with electric vehicle charging equipment. A hammerhead fire truck turnaround will be provided at the western-most end of the parking lot and provide a stub out to the future driveway at the Future Public Street. Two covered drop-off areas will be constructed along the northern edge of the parking lot, one at the entrance to the Assisted Living Facility and one at the entrance to the Memory Care Facility. The commercial building will be accessed from the parking lot and associated walkways.

A 24-foot wide emergency vehicle access (EVA) and parking area will extend along the northern edge of the property line and be constructed of pervious pavement. A fire truck turnaround will be provided at the northeast corner of the Memory Care Facility. Parking stalls and trash enclosures would be located along the EVVA drive aisle. An 8-foot wide landscaping strip would provide for tree planting along the north property line.

Pedestrian access will be accommodated throughout the site via dedicated pedestrian walkways. A 7-foot-wide sidewalk is proposed along the EVA and provides access from parking areas to the proposed Assisted Living and memory Care buildings. A 5-foot sidewalk is proposed along the site frontage to Alder Avenue and connects to internal sidewalks at the perimeter of the parking area and along SR 116. A 6-foot sidewalk is proposed along SR 116 and provides connectivity to internal parking areas, the pedestrian plaza, and the proposed commercial building. The pedestrian walkways allow for future offsite connections that would be constructed by the Cotati Village project and other future projects under build out of the General Plan.

In the future, consistent with the City of Cotati's General Plan, Alder Avenue will be inaccessible from SR 116 and instead will terminate in a cul-de-sac. The project includes plans for the future dedication of land along Alder Avenue to accommodate the planned future construction of the Alder Avenue cul-de-sac. In the future, when Alder Avenue transitions to a cul-de-sac, site access will be provided via construction of a new public street (north-south street) adjacent to the property's western boundary and connection of the western driveway, which is stubbed out in anticipation of future connectivity. Construction of the cul-de-sac would result in the removal of approximately 10 parking spaces from the proposed onsite parking. The future north-south street is not proposed for construction at this time, but is planned to be signalized at its intersection with SR 116 in the future, once developed. The project provides adequate right-of-way dedication to accommodate planned future improvements including the Alder Avenue cul-de-sac, the future north-south street, and the planned future widening of SR 116.

Landscaping and Lighting

The Landscape Site Plan includes a mix of trees, shrubs, groundcover and grasses. Trees and other landscaping are proposed along the perimeter of the project site, throughout the parking lot, between buildings, and within the

interior courtyards (see Sheet L2.1: Tree Planting Plan and Sheet L2.2: Understory Planting Plan). Landscaping will feature drought tolerant plants and a high efficiency irrigation system, including weather-based controllers. Landscape areas will establish buffers, provide shading, and will serve as stormwater detention facilities.

Proposed lighting includes: street lights along the project site's frontage with SR 116 and Alder Avenue (City of Cotati standard light); exterior parking lot lights mounted to 14-foot poles; path pole lights (within courtyards); path lights around walkways; and exterior lighting for the buildings (see Sheet L1.1: Landscape Site Plan).

Water Supply

Potable water would be accommodated via the installation of new water laterals that would connect the new buildings to the existing 10-inch water line within Alder Avenue.

Wastewater

Wastewater would be accommodated via the installation of new sanitary sewer laterals that would connect to the existing 10-inch sanitary sewer main within SR 116. The new sanitary sewer lines would collect wastewater generated onsite and convey flows through the existing sanitary sewer system to the wastewater processing plant for treatment.

Solid Waste

Two covered solid waste containment areas are proposed; one would be situated west of the commercial building and one would be located north of the Assisted Living Facility. Each solid waste containment area would include two dumpsters, one for trash/landfill materials and one for recyclable materials, and would be enclosed by 6-foot-high concrete masonry unit walls with metal gates.

Storm Drainage Infrastructure

Storm drains would be utilized throughout the project site to direct stormwater from impervious areas to the landscaped courtyards, rain garden/detention basin located within the internal drive aisle, and other vegetated bio-retention features consistent with the requirements of Low Impact Development (LID). Stormwater runoff would either discharge to the existing swale along the western edge of the property or to the existing storm drain network along Alder Avenue.

Site Preparation and Construction

For the purpose of this analysis, it is assumed that site preparation and construction would occur within an approximately 12-month period. Site preparation would initiate with the removal of existing structures, impervious surfaces, vegetation, and trees.

A Tree Preservation and Mitigation Report was prepared by Horticultural Associates on May 17, 2016 (**Appendix B**). Of the 56 trees inventoried and evaluated in the report, project construction would involve the removal of 22 trees and the preservation of 34 trees. The 22 trees proposed for removal include: two (2) Coast Redwoods; 13 Valley Oaks; one (1) Black Walnut; one (1) Arborvitae; one (1) Western Cottonwood; three (3) Black Acacias; and one (1) Silver Maple. Five of the trees proposed for removal are in poor health or have an unstable structure.

The project would achieve a balance of cut and fill. No import of soil would be necessary, as excess cut would be reused onsite. Following completion of grading activities, infrastructure improvements and building foundations would be constructed. Foundations are proposed to be slab-on-grade. Utilities, storm drains and catch basins would be installed and buildings erected. New driveways, sidewalks, curbs and gutters, striping, landscaping, and signage would be installed.

Construction equipment expected to be utilized during site preparation and grading includes tractors, backhoes, haul trucks, graders, pavers and water trucks. All material and equipment would be staged on-site or, through issuance of an encroachment permit, at abutting right-of-ways.

Construction of the proposed project will result in the fill of 0.06 acre of jurisdictional seasonal wetland regarded as waters of the U.S. and State subject to regulation by the U.S. Army Corps of Engineers and the Regional Water Quality Control Board (RWQCB).

Operation

The Assisted Living and Memory Care Facilities will operate 24 hours a day with residents living on-site full time. The use would be supported by administrative staff, culinary staff, housekeeping staff, nurses and medical professionals. Approximately 55-67 full-time personnel, operating in three daily shifts, would staff the proposed facility. The shifts are described below:

- Shift 1: 5:30am – 1:30pm (25-30 staff)
- Shift 2: 1:30pm – 9:30pm (25-30 staff)
- Shift 3: 9:30pm – 5:30am (5-7 staff)

The facility will have one 14 passenger bus which will provide transportation for the residents to outings in the community, trips to the grocery store, and to other locations such as the library and City Hall. The shuttle services will typically occur mid-day, outside of the peak commute hours.

The commercial building will operate as a cannabis dispensary, and generally be open between the hours of 10:00 am to 7:00 pm, seven days a week. The dispensary will employ approximately 10 staff per day. Two employees will serve as security, six will interact with the customers, and two will serve as managers. The dispensary anticipates serving approximately 300 customers per day.

Required Discretionary Actions

The project requires the following discretionary entitlements from the City of Cotati:

- Zoning text amendment to allow Residential Care Facilities for the Elderly within the Commercial, Gravenstein Corridor Zoning Designation, with a Use Permit
- Lot line adjustment
- Use Permit for RCFE
- Commercial Cannabis Permit to operate the dispensary (CC Resolution 2018-44)
- Design Review for the buildings and landscaping of the site
- Tree removal permit

Other Public Agency Review

The project requires approval from the following public agencies:

- U.S. Army Corps of Engineers (Clean Water Act, Section 404 permit)
- Regional Water Quality Control Board (Water quality certification, Section 401 of the Clean Water Act)
- U.S. Fish and Wildlife Service (Endangered Species Act permit)
- California Department of Fish and Wildlife Service (California Endangered Species Act permit)
- Caltrans Encroachment Permit

California Native American Tribal Consultation

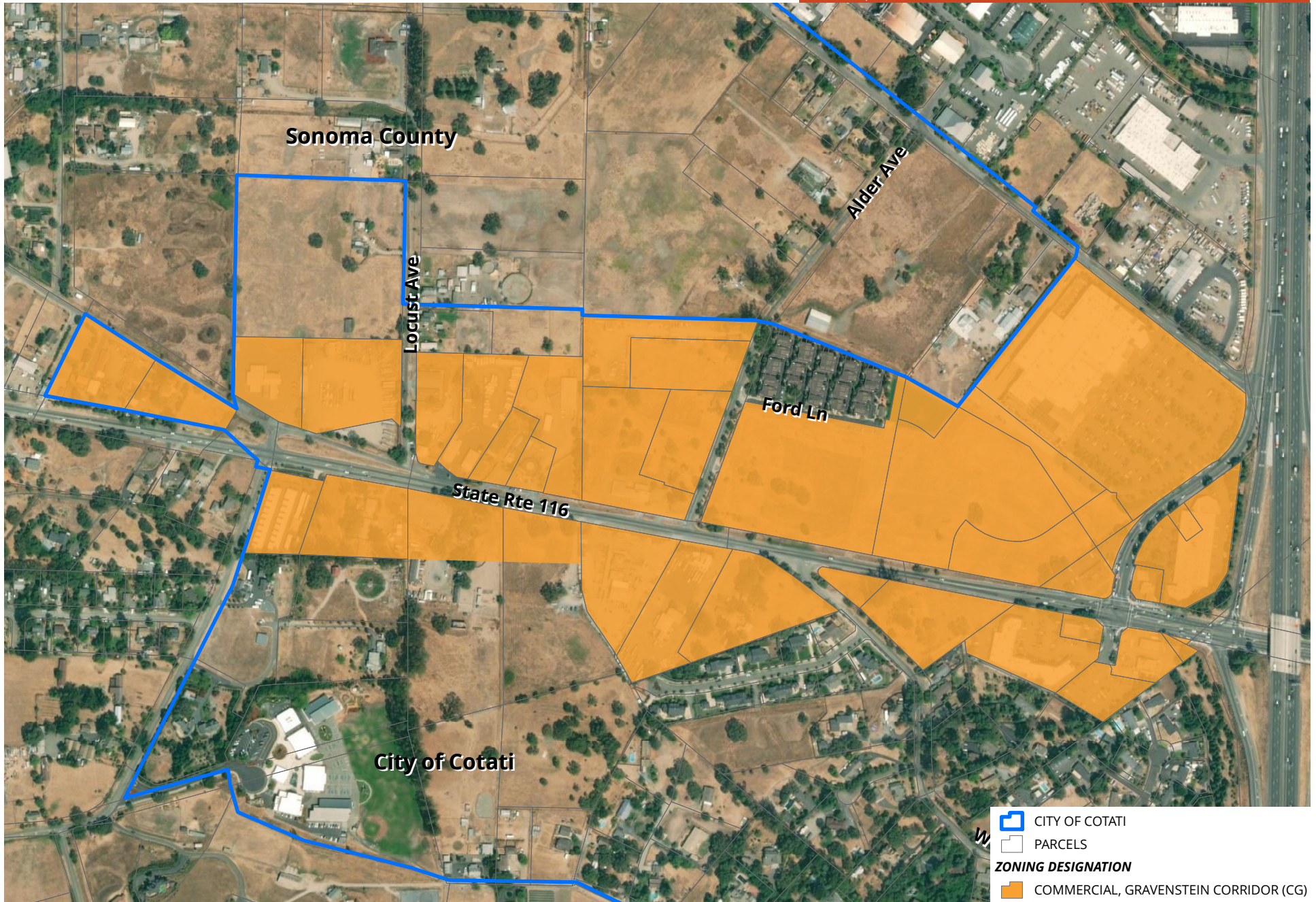
In accordance with Public Resources Code (PRC) Section 21084.2, lead agencies are required to consider Tribal Cultural Resources (TCR) including a site feature, place, cultural landscape, sacred place or object, of cultural value to the tribe and is listed on the California Register of Historic Resources (CRHR) or a local register, or the Lead

agency, at its discretion, chooses to treat resources as such. In accordance with PRC Section 21080.3.1(b)(1), the Federated Indians of Graton Rancheria, in a letter dated July 2015, stated that its tribe was traditionally and culturally affiliated with a geographic area within the City of Cotati's geographic area of jurisdiction, and requested formal notice of and information on projects for which the City of Cotati serves as a lead agency under CEQA.

In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the Federated Indians of Graton Rancheria on January 14, 2019, which included a brief description of the proposed project and its location, the City of Cotati's contact information, and a notification that the Federated Indians of Graton Rancheria has 30 days to request consultation pursuant to this section.

The City of Cotati did not receive a response requesting consultation under PRC Section 21080.3.1(b)(2) from the Federated Indians of Graton Rancheria.

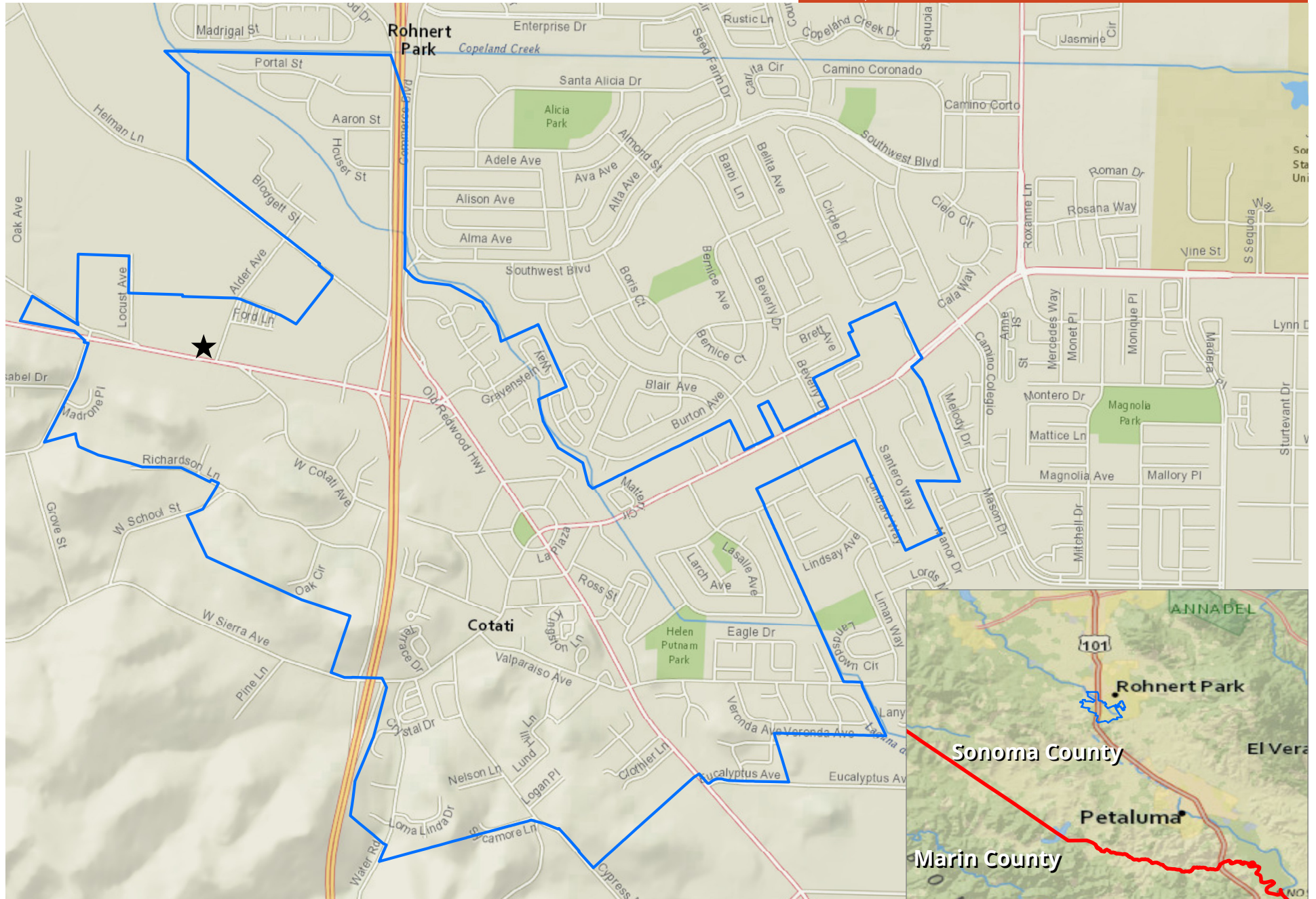
[PAGE INTENTIONALLY LEFT BLANK]



CG ZONING DISTRICT

0 0.045 0.09 0.18 Miles

Data source: Sonoma County; City of Cotati: Aug 2009; ESRI Basemap

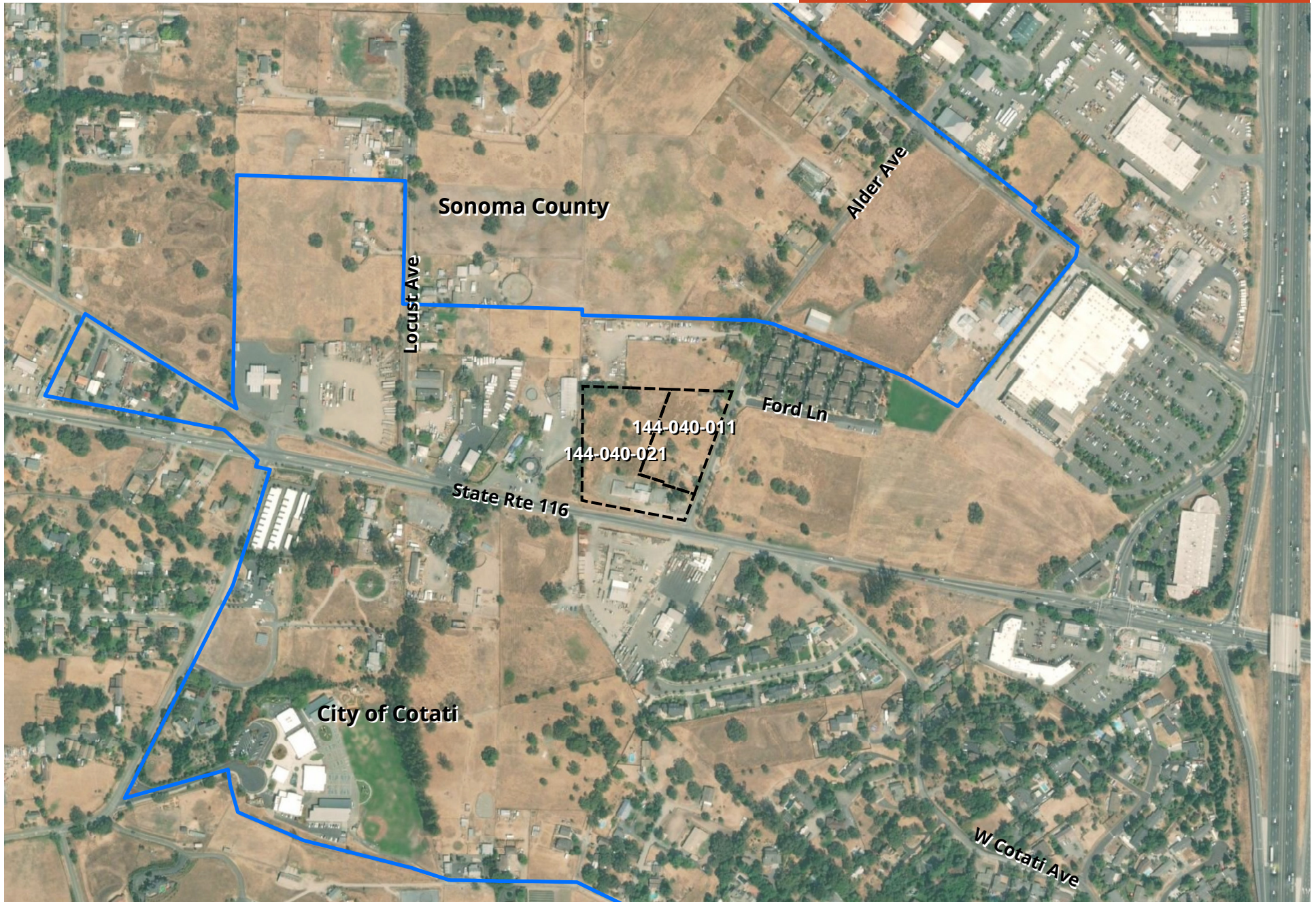


RESIDENTIAL CARE FACILITY FOR THE ELDERLY: REGIONAL LOCATION

0 0.125 0.25 0.5 Miles

Data source: Sonoma County; ESRI Basemap


- CITY OF COTATI
- SONOMA COUNTY
- ★ PROJECT LOCATION

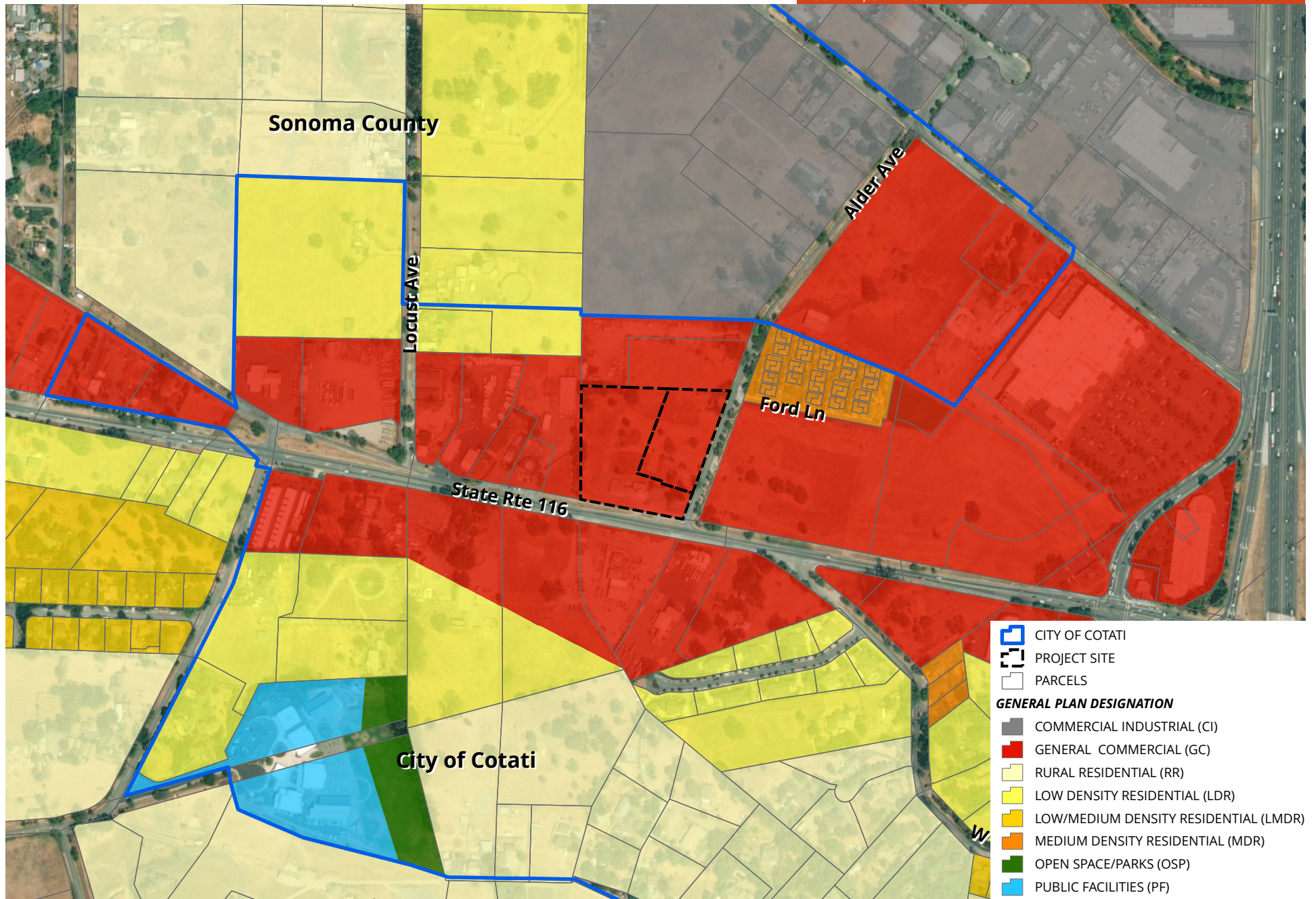


RESIDENTIAL CARE FACILITY FOR THE ELDERLY: PROJECT VICINITY

0 0.045 0.09 0.18 Miles

Data source: Sonoma County; ESRI Basemap

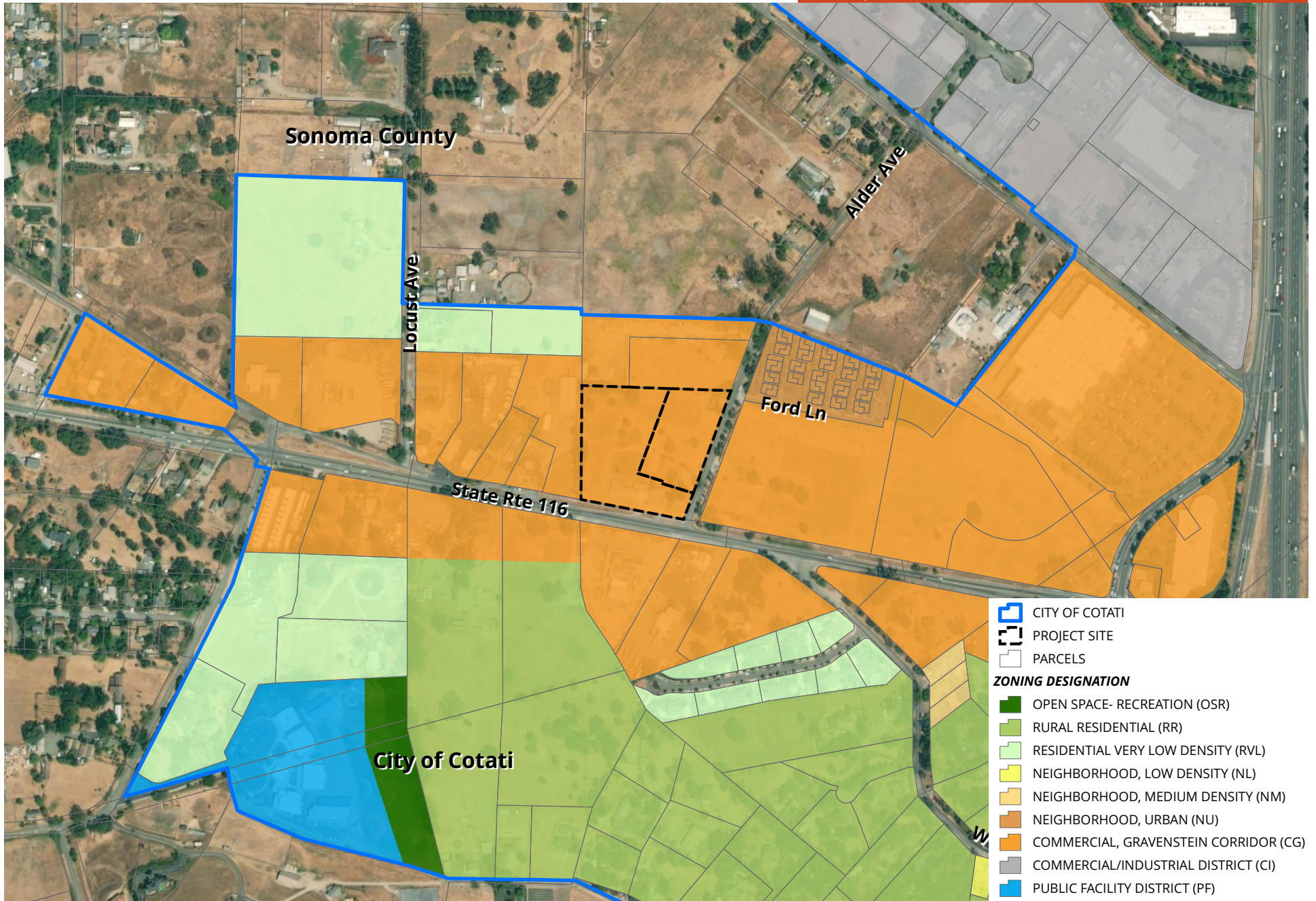
 CITY OF COTATI
 PROJECT SITE



RESIDENTIAL CARE FACILITY FOR THE ELDERLY: GENERAL PLAN LAND USE

0 0.045 0.09 0.18 Miles

Data source: Sonoma County; City of Cotati: March 24, 2015; ESRI Basemap



RESIDENTIAL CARE FACILITY FOR THE ELDERLY: ZONING

0 0.045 0.09 0.18 Miles

Data source: Sonoma County; City of Cotati: Aug 2009; ESRI Basemap



RESIDENTIAL CARE FACILITY FOR THE ELDERLY: SITE PLAN

0 55 110 220 Feet

Data source: Sonoma County; SGPA Architecture and Planning Proposed Site Plan Sheet A-2 dated 12/5/2018; ESRI Basemap



AREA OF FRONTAGE IMPROVEMENTS

See Cotati Village - Offsite Improvements plans submitted to the City of Cotati for more information on frontage improvements



3. 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 Unless Mitigation is Incorporated" as indicated by the checklist on the following pages.

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

The CEQA Initial Study (IS) Checklist and written explanations are provided in Section 4 below. The IS Checklist and narrative indicate the level of significance of the potential environmental effects of the proposed project upon each of the noted environmental resources.

4. DETERMINATION**(TO BE COMPLETED BY THE LEAD AGENCY)**

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment. 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.	X
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier 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.	

Signature: Jon-Paul Harries, Senior Planner, City of Cotati

Date

5. EVALUATION OF ENVIRONMENTAL IMPACTS

The following discussion addresses the potential level of impact relating to each aspect of the environment.

5.1. AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; Biological Resource Analysis, prepared by Monk & Associates, November 26, 2018; Tree Preservation and Mitigation Report, prepared by Horticultural Associates, May 17, 2016; Project Plans dated December 5, 2018; Preliminary Site Improvement Plans December 3, 2018; Landscape Plans dated December 3, 2018; and California Scenic Highway Mapping System, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, Accessed October 11, 2018.

Existing Aesthetics Setting:

The City of Cotati is located in the southern portion of Sonoma County where it is surrounded by the Sonoma Mountains, old growth oaks and vineyards. Cotati is bisected by Highway 101, north of Petaluma and south of Rohnert Park. The City of Cotati exhibits a historic city core with traditional urban forms featuring minimal setbacks and large sidewalks. The remainder of the City, near the periphery, most closely resembles modern suburban patterns of development comprised primarily of detached houses with a limited number of townhomes, apartments and some retail/commercial uses. The more suburban areas of the City exhibit a uniformity that is generally absent from the downtown core.

The project site where the Residential Care Facility for the Elderly (RCFE) & Commercial Building is proposed exhibits relatively flat topography and contains several existing structures, including two single-family residence and detached garages, an old tavern, a workshop/barn structure, and a few small sheds located mainly in the southeast corner of the property. The remainder of the project site is undeveloped and contains ruderal vegetation, a seasonal wetland, an isolated drainage ditch, and 56 trees, including a number of scattered native oak trees (*Quercus garryana*, *Q. kelloggii*, *Q. agrifolia*, and *Q. lobata*).

Ruderal annual grassland and ranchette style housing occurs to the north of the project site. Beyond Alder Avenue to the east, is the existing residential townhouse development; the Cotati Cottages subdivision. Additional

residential and commercial development is currently under consideration and was previously evaluated in the South Sonoma Business Park EIR (SCH No. 2000052045) for the property directly east of the project site. To the south of the property, across SR 116, is Shamrock Materials, Inc., a business specializing in stone and concrete building supplies. The Cotati Large Animal Hospital and Cotati Small Animal Hospital are located directly west of the project site.

Aesthetics Impact Discussion:

Zoning Text Amendment to Allow RCFE within CG Zoning District

5.1(a-d) (Scenic Vista, Scenic Resources, Degrade Visual Character, Conflict with Regulations Governing Scenic Quality, Light and Glare) No Impact: As shown in Figure 1, the parcels that are zoned as CG are located along SR 116 and within the City limits. The built-up nature of the areas surrounding these parcels obscures existing views of the Sonoma Mountains to the east, which are identified as major scenic resources in the Cotati General Plan. The proposed zoning text amendment would allow for future development applications to be received for Residential Care Facilities for the Elderly within the CG Zoning District. Future RCFE development within the CG district would introduce new buildings that are expected to be similar in size and character to those that are currently allowed in the District (e.g., commercial, retail, and lodging). Further, any future RCFE applications within the CG Zoning District would be subject to a Use Permit that would consider compatibility with surrounding uses and Design Review that would consider that the architectural style, massing, color and materials, and outdoor lighting. The proposed zoning text amendment is consistent with the General Plan and would allow RCFE in the CG Zoning District where similar types of uses are already allowed. Therefore, there would be no aesthetic impacts from the proposed zoning text amendment.

Residential Care Facility for the Elderly & Commercial Building

5.1(a) (Effect a Scenic Vista) Less Than Significant Impact: Scenic vistas viewed from the project site are largely confined to views of the Sonoma Mountains east of Cotati. The Cotati General Plan EIR (Figure 3.1-1) also identifies SR 116 and the hills west of the City limits and west of the project site as scenic resources. The project proposes the demolition of existing dilapidated and boarded up structures onsite and development of three new buildings, one- and two-stories in height, and associated site improvements. The project site is currently underutilized and surrounded by a mix of suburban, light industrial, commercial and rural uses. Development of the proposed project site will extend the existing urban landscape observed in the project vicinity. Views of the Laguna de Santa Rosa watershed, Sonoma Mountains, local hillsides, natural resources, open space and agricultural lands will not be substantially impact by the proposed development project. Therefore, impacts associated with scenic vistas will remain below significant levels.

5.1(b) (Scenic Resources from Designated Scenic Highway) No Impact: Natural scenic resources in and around Cotati consist primarily of agricultural lands, undeveloped hillsides, undeveloped watershed habitat (open space) and creek corridors. Sonoma County has also designated various highways and roadways throughout the unincorporated County as Scenic Corridors. In the vicinity of the project site, SR 116 from Madrone Avenue to SR 1, is a Sonoma County Designated Scenic Corridor; therefore, the project site is not located near any scenic roadways.

There are no state designated scenic highways within the City of Cotati. While SR 116 is a designated scenic highway, only the portion from SR 1 to Sebastopol, outside of Cotati city limits, is designated as such. Introduction of the proposed project will not damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings viewable from a designated (or eligible) State scenic highway. Therefore, the project will have no impacts to scenic resources visible from designated scenic highways.

5.1(c) (Degrade Visual Character, Conflict with Regulations Governing Scenic Quality) Less Than Significant Impact: Construction of the proposed project would change the project site from undeveloped land containing ruderal vegetation, a seasonal wetland, abandoned and dilapidated structures, and an isolated drainage ditch, to a

developed condition containing one- and two-story buildings, parking and landscaping. New development introduced onsite would be visible from SR 116, Highway 101, local roadways and adjacent land uses.

The proposed project is subject to Design Review in order to ensure that the architectural style, massing, color and materials, and other design elements of the proposed buildings are compatible with the existing character.

The project would be located within the City Limits and would be compatible with the existing visual character of the area which includes an existing residential townhouse development (east), residential and commercial development associated with the SSBP (east), Shamrock Materials, Inc. (south), and the Cotati Large Animal Hospital and Cotati Small Animal Hospital (west). Consistent with the City's General Plan the proposed project would introduce residential and commercial uses on an underutilized parcel within the City's existing urbanized area. Therefore, potential impacts to the existing visual character of the site and its surroundings would be less than significant.

5.1(d) (Light and Glare) Less Than Significant: The project site is adjacent to existing development and roadways that are current sources of light and glare that contribute to the ambient light conditions. Current sources of light and glare in the vicinity include SR 116, Alder Avenue, street lighting, and surrounding residential development.

The project will introduce new sources of light and glare including new interior lighting as well as street lights and exterior lighting for the buildings, courtyards, and parking areas. New building materials and windows have the potential to increase glare if not properly oriented and/or glazed. Vehicles accessing the project site will introduce glare and light from headlights, which could adversely impact existing and future residents if not properly screened.

Exterior lights installed in conjunction with the proposed project will result in a minimal increase of artificial light in the immediate vicinity. The proposed project is subject to Design Review to ensure that outdoor lighting and exterior materials/colors minimize the amount of light and glare that would be introduced by the project. A Lighting Schedule has been provided and shows the location and type of lighting proposed (see Sheet L1.1: Landscape Site Plan). The Lighting Schedule indicates that all proposed lighting within the project property minimizes light spillage onto adjacent areas (see Sheet L5.0: Photometric Study).

With the proposed project, the level of activity and use will increase such that additional automobile headlights will be introduced to the project site and vicinity relative to the existing condition. The introduction of the new buildings onsite will block glare from headlights and preclude light intrusion onto adjacent properties. While new lighting will be introduced as part of the development, the additional lighting will not adversely affect day or nighttime views in the area and impacts from light and glare will be less than significant.

Mitigation Measures: None Required.

5.2. AGRICULTURAL AND FORESTRY RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

Sources: City of Cotati 2013 General Plan; General Plan EIR; and California Department of Conservation Farmland Mapping and Monitoring Program.

Agricultural and Forestry Resources Setting:

The City of Cotati contains approximately 1,104 acres of "Urban and Built-up Land," 77 acres of "Other Land," and 36 acres of "Farmland of Local Importance." According to the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), the RCFE and Commercial Building project site is designated as "Urban and Built-up Land." Lands adjacent to and surrounding the project site are designated as "Urban and Built-up Land" and "Other Land" (see **Figure C-1 in Appendix C**). "Unique Farmland" is located north and northeast of the project site, separated from the project site by "Urban and Built-up Land." No portion of the project site is under a Williamson Act contract.

In accordance with the definition provided in California Public Resources Code Section 12220(g), "forest land" is land that can support, under natural conditions, 10 percent native tree cover of any species, including hardwoods, and that allows for the preservation or management of forest-related resources such as timber, aesthetic value, fish and wildlife, biodiversity, water quality, recreational facilities, and other public benefits. The RCFE and Commercial Building project site contains a mix of native and ornamental trees, as well as ruderal vegetation, and does not meet the definition of forest land pursuant to Section 12220(g) of the Public Resources Code (see **Figure C-2 in Appendix C**). None of the land within the project site is zoned as forest land, timberland zone, or timberland zoned Timberland Production.

Agricultural and Forestry Resources Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.2(a-e) (Farmland Conversion, Williamson Act, Forestland, Timberland) No Impact: The parcels that are zoned as CG are designated as "Urban and Built-up Land" and "Other Land." As such, these parcels do not contain important farmlands nor are they under a Williamson Act contract. There are no forestlands, timberlands or such zoning on the CG Zoning District parcels. Therefore, the proposed zoning amendment would have no impacts to agricultural resources or forest uses and would not result in the conversion of such lands since none exist within the CG Zoning District.

Residential Care Facility for the Elderly & Commercial Building

5.2(a-e) (Farmland Conversion, Williamson Act, Forestland, Timberland) No Impact: There are no forestlands, important farmlands, agricultural resources or agricultural preserves located within the project site and

surrounding properties. The project site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The 2014 Sonoma County Important Farmland map shows the project site as "Urban and Built-up Land." Lands adjacent to the project site are designated as "Urban and Built-Up Land" and "Other Land." The project site is not under a Williamson Act contract. There are no forestlands, timberlands or such zoning on the subject site or vicinity. The proposed project would have no impacts to agricultural resources or forest uses and would not result in the conversion of such lands since none exist on-site or in the immediate project vicinity. Therefore, the project would have no impact to agricultural and forestry resources.

Mitigation Measures: None Required.

5.3. AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Exposure of sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; BAAQMD 2017 Bay Area Clean Air Plan; BAAQMD CEQA Guidelines May 2017; and Evaluation of Air Quality and Greenhouse Gas Emissions, prepared by Illingworth & Rodkin, January 9, 2018.

Air Quality Setting:

The City of Cotati is located within the San Francisco Bay Area air basin regulated by the Bay Area Air Quality Management District (BAAQMD). Air quality within the Bay Area Air Basin is influenced by natural geographical and meteorological conditions as well as human activities such as construction and development, operation of vehicles, industry and manufacturing, and other anthropogenic emission sources. The Federal Clean Air Act and the California Clean Air Act establish national and state ambient air quality standards respectively. The BAAQMD is responsible for planning, implementing, and enforcing air quality standards within the Bay Area Air Basin, including the City of Cotati.

The Bay Area Air Basin is designated as non-attainment for both the one-hour and eight-hour state ozone standards; 0.09 parts per million (ppm) and 0.070 ppm, respectively. The Bay Area Air Basin is also in non-attainment for the PM10 and PM2.5 state standards, which require an annual arithmetic mean (AAM) of less than 20 µg/m³ for PM10 and less than 12 µg/m³ for PM2.5. In addition, the Basin is designated as non-attainment for the national 24-hour fine particulate matter (PM2.5) standard and will be required to prepare a State Implementation Plan (SIP) for PM2.5. All other national ambient air quality standards within the Bay Area Air Basin are in attainment.

Air quality emissions of carbon monoxide (CO), ozone precursors (ROG and NOx) and particulate matter (PM10

and PM_{2.5}) from construction and operation are evaluated pursuant to the BAAQMD CEQA Air Quality Guidelines established in May 2010³ and updated in May 2017. With release of the 2017 Bay Area Clean Air Plan (CAP) and the associated EIR, it is expected that updated thresholds and guidelines may be developed in the near term. In the absence of updated guidelines and thresholds, based upon its own judgment and analysis, the City of Cotati recognizes that these thresholds represent the best available scientific data and has elected to rely on BAAQMD Guidelines dated May 2017 in determining screening levels and significance.⁴ BAAQMD air quality thresholds are presented in **Table 1** below.

TABLE 1: AIR QUALITY SIGNIFICANCE THRESHOLDS			
Pollutant	Construction	Operational	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82	82	15
PM _{2.5}	54	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other BMP	Not Applicable	
Health Risks and Hazards for New Sources or New Receptors			
	Single-Source	Cumulative	
Excess Cancer Risk	> 10.0 per one million	> 100.0 per one million	
Chronic or Acute Hazard Index	> 1.0	> 10.0	
Incremental annual average PM _{2.5}	> 0.3 µg/m ³	> 0.8 µg/m ³	
Greenhouse Gas Emissions			
GHG Annual Emissions	Compliance with a Qualified GHG Reduction Strategy or 1,100 metric tons or 4.6 metric tons per capita		

Source: BAAQMD's May 2017 CEQA Air Quality Guidelines

Note: ROG = reactive organic gases, NO_x = nitrogen oxides, PM₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, PM_{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less; and GHG = greenhouse gas.

³ Adopted by Board of Directors of the BAAQMD in June 2010 (Resolution No. 2010-6).

⁴ In March 2012, the Alameda County Superior Court ordered BAAQMD to set aside use of the significance thresholds within the BAAQMD 2010 CEQA Guidelines and cease dissemination until they complete an assessment of the environmental effects of the thresholds in accordance with CEQA. The Court found that the thresholds, themselves, constitute a "project" for which environmental review is required. In August 2013, the First District Court of Appeal reversed the Alameda County Superior Court's decision. The Court held that adoption of the thresholds was not a "project" subject to CEQA because environmental changes that might result from their adoption were too speculative to be considered "reasonably foreseeable" under CEQA. In December 2015, the California Supreme Court reversed the Court of Appeal's decision and remanded the matter back to the appellate court to reconsider the case in light of the Supreme Court's opinion. The BAAQMD published a new version of the Guidelines dated May 2017, which includes revisions made to address the Supreme Court's opinion. The May 2017 Guidelines update does not address outdated references, links, analytical methodologies or other technical information that may be in the Guidelines or Thresholds Justification Report. The BAAQMD is currently working to update any outdated information in the Guidelines.

Air Quality Impact Discussion:***Zoning Amendment to Allow RCFE within CG Zoning District***

5.3(a-d) (Conflict with Applicable Air Quality Plan, Cumulatively Considerable Net Increase of Criteria Pollutant, Expose Sensitive Receptors to Pollutant Concentrations, Other Emissions) No Impact: The proposed zoning text amendment does not involve any physical development and would not conflict with the Air Quality Plan for the Region. The amendment provides for an additional type of residential use (RCFE) in an area where other types of residential uses (dwelling units) are already allowed by the zoning code. Allowing RCFE within the CG Zoning District could introduce new sensitive receptors (residents) near existing sources of criteria pollutants, toxic air contaminants, or odors (e.g., SR 116). However, potential air quality impacts including construction and operation as well as exposure of sensitive receptors would be evaluated on a project by project basis through the Use Permit process at the time such a development application were received. The proposed zoning text amendment would not result in any physical development, nor would it substantially change the types of uses allowed in the CG District (i.e. residential uses are currently permitted). Therefore, there would be no air quality impacts from the proposed zoning text amendment.

Residential Care Facility for the Elderly & Commercial Building

Illingworth & Rodkin prepared an Evaluation of Air Quality and Greenhouse Gas Emissions for the proposed development project (see **Appendix D**). The results of the evaluation have been incorporated into the impact discussion below.

5.3(a) (Conflict with Applicable Air Quality Plan) Less Than Significant Impact: The BAAQMD adopted the 2017 Bay Area Clean Air Plan (CAP) on April 19, 2017 to comply with state air quality planning requirements set forth in the California Health & Safety Code. The 2017 CAP includes a wide range of control measures designed to decrease emissions of the air pollutants most harmful to Bay Area residents and which include particulate matter (PM), ozone (O₃), and toxic air contaminants (TACs). The CAP further endeavors to reduce emissions of methane and other “super-greenhouse gases (GHGs)” that are potent climate pollutants in the near-term and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

The proposed control strategy for the 2017 CAP consists of 85 distinct measures targeting a variety of local, regional, and global pollutants. The CAP includes control measures for stationary sources, transportation, energy, buildings, and agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Implementation of some of the control measures could involve retrofitting, replacing, or installing new air pollution control equipment, changes in product formulations, or construction of infrastructure that have the potential to create air quality impacts.

The BAAQMD CEQA Guidelines set forth criteria for determining consistency with the CAP. In general, a project is consistent if a) the project supports the primary goals of the CAP, b) includes control measures and c) does not interfere with implementation of the CAP measures.

The proposed project would have a less than significant impact due to a conflict with the Clean Air planning efforts since, a) the project supports the goals of the CAP in that it limits urban sprawl by proposing development within city limits; b) includes control measures to protect air quality during construction by implementing best control measures set forth by BAAQMD; and c) would generate air quality emissions well below the BAAQMD criteria pollutant thresholds (see Section 5.3(b) below). Therefore, the project will have less than significant impacts due to a conflict with the regional air quality plan.

5.3(b) (Cumulatively Considerable Net Increase of Criteria Pollutant) Less Than Significant with Mitigation:

Air quality emissions associated with the proposed project would result from short-term construction activities and ongoing operation. BAAQMD Guidelines include “screening criteria” that provide a conservative estimate above which a project would be considered to have a potentially significant impact to air quality. Projects that are

below the screening criteria threshold are reasonably expected to result in less than significant impacts to air quality since pollutant generation would be minimal.

The screening level thresholds for a Congregate Care Facility is shown in **Table 2** below.

Table 2: BAAQMD Screening Criteria for Congregate Care Facilities		
Land Use Type	Operational	Construction
Congregate Care Facility	657 du (NOX)	240 du (ROG)
Pharmacy/drugstore w/o drive through	48 ksf (NOX)	277 ksf (ROG)
Source: Bay Area Air Quality Management District, CEQA Air Quality Guidelines, May 2017, Table 3-1, pg. 3-2. Note: du = dwelling unit; ksf = thousand square feet; NOX = oxides of nitrogen; ROG = reactive organic gases		

The table above shows that the screening level, from construction of a Congregate Care facility is 240 dwelling units and 277,000 square feet for pharmacy (presumed to be comparable to the proposed commercial use), above which a quantitative analysis would be warranted to determine if air quality impacts would be potentially significant. The project proposes the development of a RCFE with 122 units and 4,000 square feet of commercial uses, which is below the screening thresholds for criteria pollutants. A qualitative discussion of air quality emissions is presented below.

Construction Activities

Construction activities include grubbing for the removal of vegetation, grasses, and trees, grading to achieve level buildings pads and drainages and the construction of the new RCFE and commercial buildings, as well as associated improvements (infrastructure, parking, and landscaping). During construction the project would generate temporary air pollutant emissions associated with site preparation, ground disturbance, operation of heavy-duty construction equipment, workers traveling to and from the site, and the delivery of materials. These activities would create temporary emissions of fugitive dust from site grading, and the release of toxic air contaminants, particulate matter, and ozone precursors (ROG and NOx) from combustion of fuel and the operation of heavy-duty construction equipment.

However, given that the subject project consists of 122 units and 4,000 square feet of commercial space, which is well below the screening level established by BAAQMD, the project will result in a less than significant impact relative to construction-related emissions. The BAAQMD CEQA Air Quality Guidelines consider contributions of fugitive dust to be less-than-significant if best management practices (BMPs) are implemented. As such, **Mitigation Measure AQ-1**, which provides for a variety of dust control measures during construction activities including watering the project site, covering haul loads, limiting idling time, and temporarily halting construction when winds are greater than 15 miles per hour, is set forth below. With implementation of Mitigation Measure AQ-1 (BAAQMD-recommended best management practices), construction activities will have less than significant impacts to air quality.

Operation

The proposed project will result in both stationary and mobile sources of emissions at operation. Although there are no new stationary "point sources" proposed (large emitters such as manufacturing plants), the project will result in area source emissions from use of natural gas, consumer products such as solvents, cleaners, and paints, and landscaping maintenance equipment. A majority of the operational emissions will result from the operation of vehicles by employees as well as visitors traveling to and from the project site.

Operation of the project is not expected to result in substantial air quality emissions. Energy used for lighting, electricity, water and wastewater conveyance and treatment are expected to be minimal as the project will be required to achieve standard energy efficiency requirements under the latest building code. Therefore, impacts to air quality as a result of the project will be less than significant.

5.3(c) (Expose Sensitive Receptors to Pollutant Concentrations) Less Than Significant with Mitigation: The BAAQMD defines sensitive receptors as “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.” Sensitive receptors may include schools, hospitals and residential areas.

The project will introduce new sensitive receptors (elderly persons associated with the assisted living and memory care facilities) to an area with existing and future sources of toxic air contaminants (TACs). The BAAQMD recommends using a 1,000-foot screening radius around a project site for purposes of identifying community health risk from siting a new sensitive receptor or a new source of TACs. Substantial sources of TACs include highways, busy surface streets, and stationary sources. Sources of TACs within 1,000 feet of the project site include SR 116 and Shamrock Materials, Inc.

Sensitive receptors that could potentially be affected by dust and equipment exhaust generated by construction activities include existing surrounding residential uses to the northeast and northwest of the project site, as well as the Thomas Page Academy (0.25 mile to the southwest). Residential units are also proposed east of the project site, across Alder Avenue. Residential areas and schools are considered sensitive receptors because people are often at home/school for extended periods of time. To evaluate lifetime cancer risks and non-cancer health effects of concentrations resulting from project construction, emissions and dispersion modeling were conducted.

Construction

For expanded detail on the methodology used to measure construction related impacts to sensitive receptors, see the Evaluation of Air Quality and Greenhouse Gas Emissions prepared by Illingworth and Rodkin in **Appendix D**.

Increased cancer risks were calculated for infant exposure and adult exposure during construction of the proposed project. The maximum excess residential cancer risk at the maximally exposed individual (MEI), which is located at the existing residential units to the east of the site, would be 57.6 in one million for an infant exposure and 1.0 in one million for an adult exposure. This exceeds the BAAQMD single-source threshold of more than 10 in one million, which is a potentially significant impact. However, with mitigation (described below), the infant cancer risk is reduced to less than 5.7 in one million, which is below the BAAQMD threshold and would effectively reduce impacts to less than significant levels.

The maximum-modeled annual $PM_{2.5}$ concentration, based on combined exhaust and fugitive dust, is projected to be 0.63 ug/m^3 , occurring at the residential MEI, which exceeds the BAAQMD single source threshold of more than 0.3 ug/m^3 . However, with mitigation (described below), the maximum $PM_{2.5}$ is reduced to less than 0.16 ug/m^3 , which is below the BAAQMD threshold and would reduce impacts to less than significant levels.

The maximum computed hazard index (HI) is 0.07, which is below the BAAQMD threshold of 1.0. **Table 3** shows the combined cancer risk, $PM_{2.5}$ concentrations, and the non-cancer hazard index at the maximally exposed individual.

During construction, onsite activities will result in the emission of diesel exhaust from vehicles and heavy-duty equipment, which is a known TAC, as well as the generation of fugitive dust from grading and ground disturbing activities. To ensure that diesel exhaust and fugitive dust emissions are reduced to levels below significance, Mitigation Measure AQ-1 and AQ-2 shall be implemented. AQ-1 is set forth pursuant to BAAQMD Basic Control Strategies and requires covering haul trucks, watering during active ground disturbance, limiting idling time, proper maintenance of equipment, and other standard measures. **Mitigation Measures AQ-2** requires that off-road equipment used during construction activities achieve a fleet-wide average reduction of 80 percent, or more, in particulate matter exhaust emissions. With implementation of AQ-1 and AQ-2, potential impacts to the

surrounding sensitive receptors during construction will be reduced to levels below significance.

TABLE 3: IMPACTS FROM COMBINED SOURCES AT CONSTRUCTION MEI

SOURCE	MAXIMUM CANCER RISK (PER MILLION)	MAXIMUM ANNUAL PM _{2.5} CONCENTRATION (UG/M ³)	MAXIMUM HAZARD INDEX
<u>Project Construction</u>			
<i>Unmitigated</i>	57.6 (infant)	0.63 (infant)	0.07
<i>Mitigated</i>	5.7 (infant)	0.16	0.01
BAAQMD Single Source Threshold	>10.0	>0.3	>1.0
<u>Exceeds Threshold?</u>			
<i>Unmitigated</i>	YES	YES	NO
<i>Mitigated</i>	NO	NO	NO
SR 116 (Link 632, 6 feet elevation at 400 feet)	4.9	0.03	0.00
<u>Combined Sources</u>			
<i>Unmitigated</i>	62.5 (infant)	0.68 (infant)	0.07
<i>Mitigated</i>	10.6 (infant)	0.19	0.01
BAAQMD Combined Source Threshold	>100	>0.8	>10.0
<u>Exceeds Threshold?</u>			
<i>Unmitigated</i>	NO	NO	NO
<i>Mitigated</i>	NO	NA	NA

Source: BAAQMD's May 2017 CEQA Air Quality Guidelines and Evaluation of Air Quality and Greenhouse Gas Emissions, prepared by Illingworth & Rodkin, January 9, 2018.

Operation

At operation, the project will not generate stationary source emissions that could affect sensitive receptors. However, the project's new residents have the potential to be exposed to toxic air contaminants (TACs) released by vehicles traveling on nearby roads as well as from stationary sources permitted by BAAQMD. Although this is not an impact of the project on the environment, introducing new sensitive receptors to areas with elevated TAC levels would introduce an inconsistency with General Plan Policy CON 2.2: Minimize Exposure of sensitive receptors to concentrations of air pollutant emissions and toxic air contaminants.

The BAAQMD provides CEQA community risk and hazards screening tools for lead agencies to use when considering whether there should be further, more detailed environmental review of a project. Lead agencies may use the screening tools to assess a project's potential risk and hazard impacts, compare the results to the lead agency's applicable thresholds of significance, and determine whether additional analysis is necessary.

The BAAQMD Risk and Hazard Screening Analysis Process Flowchart directs that lead agencies should identify three (3) emission sources (i.e., highway, major roadway, stationary) within 1,000 feet of a project's boundary and compare each source individually against the screening criteria and directs that the values from all sources be compared against a cumulative screening value. The emission sources in the vicinity of the proposed project State Route 116 and Shamrock Materials.

Google Earth's *Highway Screening Analysis Tool* was used to identify screening level cancer risk, non-cancer hazards, and annual PM_{2.5} concentrations from SR 116.⁵ The health risks are presented below and show that

⁵ Link 632, at an elevation of 6 feet was selected, as the closest node to the project site (approximately 200 feet north of SR 116).

emissions from SR 116 are below the BAAQMD significance thresholds at the project site:

Cancer Risk = less than 6.42 per million* (BAAQMD threshold = 10.0)

Hazard Index = less than 0.01 (BAAQMD threshold = 1.0)

Annual PM_{2.5} = 0.053 ug/m³ (BAAQMD threshold = 0.3 ug/m³)

*Note cancer risk using infant and child sensitivity with 70-year exposure.

Shamrock Materials Inc. operates a facility south of the project site, on the opposite side of SR 116. The facility includes a gasoline storage tank that is listed as Plant #G255 by BAAQMD. This is a small facility and does not have screening levels listed by BAAQMD. Given the nature of the size and type of source, the gasoline tank likely has no effect on the project site, especially given that it is 350 feet or further from the project site.

At operation, the potential health risks associated with State Route 116 vehicle emissions is below established thresholds and, therefore, siting new sensitive receptors at the project site will not introduce a potential inconsistency with General Plan Policy CON 2.2. The proposed project, as an Assisted Living and Memory Care Facility and commercial use, will not generate emissions affecting sensitive receptors. Therefore, health risk impacts to sensitive receptors at operation of the project will be less than significant.

5.3(d) (Other Emissions) Less Than Significant Impact: There may occasionally be other emissions which could lead to localized odors during site development associated with construction equipment, paving and the application of architectural coatings. Any emissions that lead to odors generated during construction would be temporary and not likely to be noticeable beyond the immediate construction zone. As a residential care facility for the elderly and commercial use, operation of the project will not create other emissions adversely affecting a substantial number of people. Therefore, the project will have less than significant impacts to air quality due to other emissions.

Mitigation Measures:

AQ-1: Latest BAAQMD recommended Best Management Practices (BMPs) to control for fugitive dust and exhaust during all construction activities shall be incorporated into all demolition and construction plans to require implementation of the following:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times per day using recycled water.
2. All haul trucks transporting soil, sand, or other loose material shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 mph.
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper working condition prior to operation.
8. Construction equipment staging shall occur as far as possible from existing sensitive receptors (away from the northeast property line and surrounding residences).

9. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

AQ-2: To reduce potential impacts to air quality during construction, the project shall develop and implement a plan demonstrating that off-road equipment used on-site to construct the project would achieve a fleet-wide average 80 percent reduction, or more, in particulate matter exhaust emissions. Examples of how to achieve this reduction include the following:

1. Diesel-powered off-road equipment larger than 50 horsepower operating on-site for more than two days shall meet, at a minimum, U.S. EPA particulate matter emissions standards for Tier 4 engines or equivalent.
2. Require the use of construction equipment that is alternatively-fueled (i.e., non-diesel).
3. Require the use of equipment that meets U.S. EPA particulate matter emissions standards for Tier 2 or 3 engines (or equivalent) and includes CARB-certified Level 3 Diesel Particulate Filters.
4. The simultaneous occurrence of excavation, grading, and ground-disturbing construction 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.
5. Minimize the idling time of diesel-powered construction equipment to two minutes.
6. All construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM.
7. Require all contractors use equipment that meets CARB's most recent certification standard for off-road heavy-duty diesel engines.

5.4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (Formerly Fish and Game) or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife (formerly Fish and Game) or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

other means?

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

☐☐☒☐

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

☐☒☐☐

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

☐☐☒☐

Sources: City of Cotati 2013 General Plan; General Plan EIR; Santa Rosa Plain Conservation Strategy, prepared by U.S. Fish and Wildlife Service, December 2005; Recovery Plan for the Santa Rosa Plain, prepared by U.S. Fish and Wildlife Service, May 2016; Biological Resource Analysis, prepared by Monk & Associates, November 26, 2018; and Tree Preservation and Mitigation Report, prepared by Horticultural Associates, May 17, 2016.

Biological Resources Setting:

Biological resources are protected by state and federal statutes including the Federal Endangered Species Act (FESA), the California Endangered Species Act (CESA), the Clean Water Act (CWA), and the Migratory Bird Treaty Act (MBTA). These regulations provide the legal protection for plant and animal species of concern and their habitat at the state and federal level. As reported in the General Plan, the biological diversity within the City limits includes agriculture (63 acres), annual grassland (87 acres), and freshwater emergent wetland (2 acres).

The project site, like of much of Cotati and Sonoma County, is designated as critical habitat for California tiger salamander (CTS). The CTS was federally listed as endangered in 2003 and state-listed as a threatened species in 2010. In 2011, the USFWS designated revised critical habitat for the Sonoma County "Distinct Population Segment" of the California tiger salamander. In total, approximately 47,383 acres of land were designated as critical habitat for the Sonoma County "Distinct Population Segment" of the California tiger salamander under the revised Final Rule. The project site is within the mapped critical habitat.

CTS occur in grasslands and open oak woodlands that provide suitable aestivation (over summering) and/or breeding habitats. They spend most of their lives underground and typically only emerge from their subterranean refugia for a few nights each year during the rainy season to migrate to breeding ponds. The maximum migration distance of California tiger salamanders to/from their breeding pools to upland over-summering habitat is typically 1.3 miles.

In Sonoma County, subterranean refugia likely include Botta's pocket gopher (*Thomomys bottae*) burrows, deep fissures in desiccated clay soils, and debris piles (e.g., downed wood, rock piles). Stock ponds, seasonal wetlands, and deep vernal pools typically provide most of the breeding habitat used by California tiger salamanders. Occasionally, they are found breeding in slow moving streams or ditches. Seasonal wetlands that are used for breeding typically must hold water into the month of May to allow enough time for larvae to fully metamorphose. Typically, in Sonoma County pools that are 16 inches or deeper in the peak winter months will remain inundated long enough to provide good breeding conditions for California tiger salamanders. Late spring rainfall events often allow California tiger salamanders to successfully breed in shallower pools.

A site-specific Biological Resource Analysis was prepared by Monk & Associates (**Appendix E**). Monk & Associates researched the most recent version of the California Department of Fish and Wildlife's (CDFW) Natural Diversity

Data Base (CNDDDB) for reported occurrences of special-status vegetation communities, plants and animals. Based on the CNDDDB record search, Monk & Associates compiled a list of nine (9) special-status plant species and nine (9) special-status wildlife species that are known from the region of the project site. On July 15, 2016, on three days in 2017 (April 24, May 26, June 15), and on March 20, 2018, Monk & Associates biologists conducted surveys of the project site to record biological resources, conduct formal rare plant surveys, and conduct a wetland delineation.

The landscaping around the existing buildings on the project site includes horticultural species such as cottonwood (*Populus sp.*), black walnut (*Juglans hindsii*), Mexican fan palm (*Washingtonia filifera*), blackwood acacia (*Acacia melanoxylon*), thuja (*Thuja sp.*), English ivy (*Hedera helix*) and periwinkle (*Vinca major*). Additionally, there are scattered native oaks that occur on the project site as well (*Quercus garryana* and *Q. lobata*). Due to the history of intensive site disturbance, only two distinct plant communities were identified on the project site: ruderal vegetation and seasonal wetland.

A ruderal herbaceous community comprises the majority of the project site. Some of these non-native grass dominants found on the project site include Harding grass (*Phalaris aquatica*), wild oats (*Avena barbata*), soft chess (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), Italian ryegrass (*Festuca perennis*), brome fescue (*Festuca bromoides*), hare barley (*Hordeum murinum ssp. leporinum*), and tall oat grass (*Arrhenatherum elatius*). Common non-native forbs found on the project site include bristly ox-tongue (*Helminthotheca echioides*), bindweed (*Convolvulus arvensis*), Italian thistle (*Carduus pycnocephalus ssp. pycnocephalus*), purple salsify (*Tragopogon porrifolius*), Queen Ann's lace (*Daucus carota*), fennel (*Foeniculum vulgare*), prickly lettuce (*Lactuca serriola*), rough cat's ear (*Hypochaeris radicata*), spring vetch (*Vicia sativa*), wild radish (*Raphanus sativus*), cutleaf geranium (*Geranium dissectum*), mustards (*Brassica nigra*, *Hirschfeldia incana* and *Sisymbrium altissimum*) and clovers (*Trifolium incarnatum*, *Trifolium subterraneum*, *Trifolium dubium* and *Trifolium hirtum*).

Due to past cultivation of lavender fields and grading disturbance, very few native, herbaceous taxa remain on the project site. The few native plant species found in the ruderal community includes California poppy (*Eschscholzia californica*), Spanish clover (*Acemisson americanus ssp. americanus*), willow herb (*Epilobium brachycarpum*), cleavers (*Galium aparine*), summer cottonweed (*Epilobium brachycarpum*) and creeping wildrye (*Elymus triticoides ssp. triticoides*).

Animals observed or expected to occur in ruderal habitats are typically those species adapted to human disturbance such as the following species observed on the project site: northern mockingbird (*Mimus polyglottos*), European Starling (*Sturnus vulgaris*), mourning dove (*Zenaidura macroura*), house sparrow (*Passer domesticus*), house finch (*Haemorrhous mexicanus*), and black phoebe (*Sayornis nigricans*).

One seasonal wetland occurs in a slight topographic low area in the northern portion of the project site. Monk & Associates biologists have examined this wetland in the winter months since it was originally documented in 2003/04. The wetland generally pools to a few inches deep before drying/draining and then refilling with successive larger storm events. A mix of common non-native and native upland and hydrophytic herbaceous species were observed within this seasonal wetland. Dominant species included annual semaphore grass (*Pleuropogon californicus*), Mediterranean barley (*Hordeum marinum ssp. gussoneanum*), meadow foxtail (*Alopecurus pratensis*), pennyroyal (*Mentha pulegium*), Italian ryegrass (*Festuca perennis*), and hawkbit (*Leontodon saxatilis*). Other associated species included brown-headed rush (*Juncus phaeocephalus ssp. paniculatus*), English plantain (*Plantago lanceolata*), prickly little sedge (*Carex echinata ssp. echinata*), tall flatsedge (*Cyperus eragrostis*), foothill clover (*Trifolium ciliolatum*), velvet grass (*Holcus lanatus*), curly leaved dock (*Rumex crispus*), and hairy cat's ear (*Hypochaeris radicata*). The shallow, highly disturbed and highly ephemeral nature of the seasonal wetland on the project site provides limited value for use by wildlife species.

A Tree Preservation and Mitigation Report was prepared by Horticultural Associates on May 17, 2016 (**Appendix B**). Of the 56 trees inventoried and evaluated in the report, project construction would involve the removal of 22 trees and the preservation of 34 trees. The 22 trees proposed for removal include: two (2) Coast Redwoods; 13

Valley Oaks; one (1) Black Walnut; one (1) Arborvitae; one (1) Western Cottonwood; three (3) Black Acacias; and one (1) Silver Maple. Five of the trees proposed for removal are in poor health or have an unstable structure.

Biological Resources Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.4(a-f) (Sensitive Species and Habitats, State or Federally Protected Wetlands, Wildlife Movement, Conflict with Local Policies or Ordinances) Less Than Significant Impact: As shown on General Plan Figure 5.1, Sensitive Habitat and Species, all parcels within the CG Zoning District are designated as critical habitat for CTS. The proposed zoning text amendment would not result in any physical development at this time. As such there would be no impacts to special-status plants, special-status wildlife, riparian habitat, wetlands, protected trees, or other biological resources. Allowing RCFE within the CG Zoning District, would conditionally permit similar uses that are currently allowed within the existing zoning regulation (e.g., commercial, retail, and lodging). In the future should RCFE uses be proposed, such a development application would be required to comply with all state and federal statutes related to the protection of biological resources, including the Federal Endangered Species Act, the California Endangered Species Act, Migratory Bird Treaty Act, and the Santa Rosa Plain Conservation Strategy Plan and the Recovery Plan. If warranted, a Biological Resources Evaluation would be required through the Use Permit process to identify site-specific biological resources and recommend mitigation measures. The parcels where the zoning text amendment would apply already allow for other types of development consistent with the General Plan. General Plan land use designation, policies, programs and mitigation provides for the protection of biological resources. The proposed zoning text amendment does not substantially alter the City's land use regulation on these parcels. Therefore, there would be no impacts related to biological resources from the zoning text amendment.

Residential Care Facility for the Elderly & Commercial Building

5.4(a-b) (Adverse Effects to Sensitive Species and Habitats) Less Than Significant with Mitigation: Certain vegetation communities and plant and animal species are designated as having special-status based on their overall rarity, endangerment, restricted distribution, and/or unique habitat requirements. In general, special-status is a combination of these factors that leads to the designation of a species as sensitive. The FESA outlines the procedures whereby species are listed as endangered or threatened and establishes a program for the conservation of such species and the habitats in which they occur. The CESA amends the California Fish and Game (Wildlife) Code to protect species deemed locally endangered and essentially expands the number of species protected under the FESA. Below is a description of the sensitive habitats and species that could occur on the project site or in the vicinity:

Special-Status Plant Species

A total of nine special-status plant species were evaluated for their potential to occur in the vicinity of the project site. Formal rare plant surveys were conducted on the project site in 2015 by Mr. Roy Buck, Senior Botanist with California Environmental Services, LLC and by Monk & Associates in 2017. No rare plants were found during the two years of rare plant surveys conducted at appropriate times when the targeted listed plants were identified in flower at reference population sites. Monk & Associates also conducted a mid-summer rare plant survey on July 15, 2016 for late-blooming species and identified no rare plants. Thus, development of the project site is not expected to impact any special-status plant species.

In compliance with new published-CDFW survey guidelines released on March 18, 2018, one additional year of surveys was conducted on the project site in 2019 to bring the previous year's surveys up to date and demonstrate the absence of special-status plants on the project site. Rare plants were not identified during the

2019 rare plant survey.⁶ In accordance with CDFW protocol, annual surveys are required until construction commences. If special-status plants are found during subsequent surveys, then the project would have the potential to adversely impact rare plants and mitigation BIO-1 and BIO-2 would be required.

Mitigation Measure BIO-1 presumes that special-status plant species are detected during future rare plant surveys. BIO-1 (only applicable if rare plants are detected) provides for avoidance of individuals or populations through site design modifications that preclude development where special-status species are present. If avoidance is not feasible, then BIO-1 requires that a mitigation plan be developed in consultation with USFWS and CDFW and as warranted an incidental take permit (ITP, 2081 agreement) be acquired. Alternatively, at the discretion of CDFW for state listed species, compensatory credits at an approved mitigation bank, onsite mitigation, or the preservation of offsite habitat may be an acceptable means of mitigation. If the plant identified is a California Native Plant Society (CNPS) Rank 1B or 2 species and is not otherwise protected pursuant to state or federal regulation, then measure BIO-2 shall apply.

Mitigation Measure BIO-2 presumes that CNPS Rank 1B or 2 special-status plant species are detected during future rare plant survey and that avoidance is not feasible. BIO-2 requires the collection and replanting of seeds and topsoil as well as long-term storage and ongoing monitoring for a 5-year period with annual reporting provided to regulatory agencies (CDFW and/or USFWS) and the City of Cotati. Alternatively, for CNPS listed species the City of Cotati may choose to accept compensatory credits from an authorized mitigation bank or the preservation of offsite habitat as an acceptable means to mitigate to loss of CEQA protected rare plant species.

If special-status plants are found onsite, implementation of **Mitigation Measures BIO-1** and **BIO-2** would reduce impacts to less than significant levels.

Vernal Pool Plant Suitable Habitat

The proposed project will result in fill to 0.06 acres of potentially suitable vernal pool habitat. Pursuant to the U.S. Fish and Wildlife Services' (USFWS) 2007 Programmatic Biological Opinion by and between the USFWS and the U.S. Army Corps of Engineers (Corps), impacts to "suitable vernal pool plant habitat" [i.e., seasonal wetlands] (even when 2 years of surveys proves absence), must nonetheless be mitigated by purchase of conservation credits. As a federal permit will be required for this project from the Corps, a federal nexus agency to the USFWS, pursuant to the USFWS' Recovery Plan for the Santa Rosa Plain, and current mitigation policy implemented by the USFWS, mitigation that compensates for impacts to "suitable seasonal wetland habitat" must be obtained from the *Limnanthes vinculans* (Sebastopol meadowfoam) Core Area.

In order to ensure that impacts to federally-listed vernal pool plant suitable habitat are reduced to levels below significance, **Mitigation Measure BIO-3** shall be implemented. BIO-3 requires the applicant to secure 0.09-acre credits for Sebastopol meadowfoam (or as otherwise allowed by the Corps/USFWS) from the Sebastopol meadowfoam Core Area for the project's impacts to approximately 0.06 acre of "suitable vernal pool rare plant habitat." This equates to a 1.5:1 replacement ratio consistent with the 2007 Programmatic Biological Opinion. The 2007 Biological Opinion is currently being revised and once released may result in changes to the replacement ratio or mitigation. BIO-3 requires that rare plant conservation credits be approved by the USFWS prior to purchase. BIO-3 further requires the applicant to provide proof that these conservation credits have been purchased to the City of Cotati prior to commencement of grading on the project site. With implementation of BIO-3, impacts to federally-listed vernal pool plants would be reduced to less-than-significant levels.

⁶ Personal communication with biologist Geoff Monk, June 25, 2019.

Special-status Animal Species

A total of nine (9) special-status animal species were evaluated for their potential to occur in the vicinity of the project site. Based on this evaluation, the project site does not provide suitable habitat for seven (7) of these species; therefore, they are not discussed further. As CTS have been captured on the site during a prior recovery/salvage project that was implemented in 2003/2004, and as there is suitable habitat for the pallid bat (*Antrozous pallidus*) on the project site, both species are discussed further below.

California Tiger Salamander (CTS)

On the project site, there is a single seasonal wetland that Monk & Associates inspected in the winter of 2003/04. This seasonal wetland does not pool water deeper than three to four inches deep and it fills and drains/dries throughout the winter months in accordance with the frequency of large storm events. No wetland on the project site is deep enough or has sufficient ponding duration to support breeding CTS; hence, there would be no impacts to California tiger salamander breeding and larval development habitat from the proposed project.

In 2003/2004, construction of the South Sonoma Business Park development project, located immediately east of the subject project site was underway. The developer was required by USFWS and CDFW to salvage California tiger salamanders presumed to be migrating from adjacent properties, including the subject project site (then called the Reds project site), to the former breeding pools (now obsolete) on the Sonoma Business Park project site. The salvage project was supervised by the CDFW and the USFWS under the assumption that all adult California tiger salamanders and their breeding habitat had been removed from the Sonoma Business Park project site when it was mass-graded in June 2002.

In September 2007, Monk & Associates prepared and submitted a report to the USFWS and CDFG summarizing the salvage trapping effort titled, *California Tiger Salamander (Ambystoma californiense) Survey and Salvage Summary "Nibe" and "Red's" Project Sites Santa Rosa, California September 20, 2007*. The report indicates that 12 adult California tiger salamanders were captured on the subject project site in the winter of 2003/2004 and were surrendered to the CDFW. Since California tiger salamanders were captured on the project site during the 2003/2004 salvage effort, the project site is regarded as habitat that could continue to support CTS. From a practical standpoint, the breeding ponds that were being used by this local population of CTS were removed by development in 2002. Thus, the possibility of CTS migrating across the project site today is very low because the project site lacks suitable habitat, the former onsite population was "salvaged" and relocated in 2003/2004 and the former breeding pools on the South Sonoma Business Park project site are no longer present. Nonetheless, the project site is regarded as habitat that could continue to support CTS.

According to the USFWS' 2007 Programmatic Biological Opinion, and as presented in the project-specific Biological Resources Analysis, impacts to over summering or migration habitat of the CTS are required to be mitigated at a 2:1 replacement to impacts ratio. Approximately 1.99 acres of the 5.63-acre project site is currently developed with buildings or hard-packed, gravel roadways and parking areas around buildings. These developed surfaces do not constitute CTS habitat and no mitigation is warranted for development of this area. However, the remaining 3.64 acres of the project site is considered potentially suitable habitat for CTS. The proposed project will result in development of the 5.63-acre site, including the 3.64 acres of potentially suitable CTS habitat.

To compensate for impacts to 3.64 acres of CTS habitat that would occur from development of the proposed project, **Mitigation Measure BIO-4** shall be implemented. BIO-4 requires that prior to grading, CTS mitigation credit from a USFWS (and CDFW) approved Conservation Bank at a ratio of 2:1 (7.28 acres) or as otherwise directed by the regulatory agencies be purchased. In accordance with the USFWS' Recovery Plan, BIO-4 requires that the applicant secure credits from the West Cotati Core California tiger salamander area (see Exhibit B of Biological Resource Analysis), and that any conservation credits purchased for the project shall be approved by the USFWS prior to the purchase of the credits. BIO-4 further requires that the applicant provide proof to the City of Cotati prior to commencement of grading on the project site that CTS conservation credits have been purchased. In addition, to ensure that migrating CTS do not move onto the project site while construction is

underway, the applicant shall install CTS exclusion fencing around the site perimeter prior to the commencement of grading. Finally, BIO-4 requires that the fencing be inspected daily by a qualified biologist or a trained construction manager, and that in the event that CTS is found trapped in the exclusion fencing, CTS shall be relocated by a qualified California tiger salamander biologist. Implementation of BIO-4 will reduce potential impacts to the California tiger salamander habitat to less-than-significant levels.

Pallid Bat

The pallid bat is a California "species of special concern." It has no federal status. The "species of special concern" status designation does not provide any special legally mandated protection for this bat species. However, this status designation meets the definition of "rare" pursuant to CEQA (14 CCR §15380(2)(A)).

The existing trees and abandoned buildings on the project site provide suitable roosting habitat for the pallid bat. This bat species is designated by the State as "species of special concern." In accordance with the CEQA Guidelines (Section 15380) which protects "rare" and "endangered" species as defined by CEQA, CDFW designated species of special concern meet this CEQA definition. Accordingly, "take" (i.e., to harm or kill) of these bats resulting from the project would be regarded as a significant impact.

If this species is present onsite, construction activities could impact pallid bat. As required by **Mitigation Measure BIO-5**, to avoid impacts to special-status bats, a qualified biologist shall conduct a pre-construction survey of the structures and trees that would be impacted by the project 15 days prior to removal or commencement of ground work. If no special-status bats are found during the surveys, then building demolition and tree removal may commence in accordance with the procedures outlined in BIO-5. If young special-status bat species are found roosting on the project site, a non-disturbance buffer installed with orange construction fencing shall be established around the maternity site, as detailed in BIO-5. Further, per BIO-5, if adults are found roosting in a tree or structure on the project site but no maternal sites are found, then the adult bats can be flushed or one-way eviction doors can be used prior to the time the tree or structure in question would be removed or disturbed. With implementation of BIO-5, potential impacts to pallid bats from the proposed project would be reduced to less-than-significant levels.

Nesting Raptors and Passerine Birds

Nesting raptors (birds of prey) and passerine (perching) birds are protected pursuant to California Fish and Game Code (Sections 3503, 3503.5, 3513), and the Federal Migratory Bird Treaty Act. The oaks present on the project site provide suitable nesting habitat for raptors and passerines. In addition, the grassland on the project site provides suitable nesting habitat for ground-nesting birds. Additionally, birds could nest on the abandoned buildings on the project site. Since typically most birds can fly out of harm's way, development of the project site would not be expected to harm adult birds. However, nesting birds are susceptible to "take" through disturbance that harms eggs or young.

If nesting birds are present onsite, construction activities could impact nesting raptors and passerine birds. As required by **Mitigation Measure BIO-6**, impacts to nesting birds will be avoided by conducting pre-construction nesting surveys and implementing avoidance measures. With implementation of BIO-6, potential impacts to nesting raptors and passerine birds would be reduced to less-than-significant levels.

5.4(c) (Adverse Effects on State or Federally Protected Wetlands) Less Than Significant with Mitigation: On May 21, 2018, the U.S. Army Corps of Engineers confirmed jurisdiction over 0.06-acre of seasonal wetland onsite. The seasonal wetland is located in a topographic depression in the northern portion of the project site. This low area remains saturated/inundated throughout the winter as indicated by the dominance of hydrophytic vegetation, presence of hydric soils and indicators of wetland hydrology (i.e. presence of standing water, saturation and oxidized rhizospheres). During large storm events, this seasonal wetland overflows and conveys water overland east to the drain inlet along Alder Avenue where it enters the City storm drain system.

Consequently, the proposed project will result in the fill of approximately 0.06 acre of jurisdictional seasonal wetland regarded as waters of the U.S. and State subject to regulation by the Corps and the RWQCB. In order to reduce impacts to potential waters of the U.S. and/or State to less-than-significant levels, the applicant shall compensate for the loss of wetlands via the purchase of wetland mitigation credits from a Corps- and RWQCB-approved Wetland Conservation Bank, as required by **Mitigation Measure BIO-7**. BIO-7 also requires that proof of the purchase of wetland mitigation credits be provided to the City of Cotati, the Corps, and the RWQCB in advance of grading activities on the project site. With implementation of BIO-7, potential impacts to jurisdictional features covered by Section 404 and 401 of the Clean Water Act will be reduced to less than significant levels.

5.4(d) (Adverse Effect to Wildlife Movement) Less Than Significant Impact: Movement corridors for wildlife through the City of Cotati include creeks, drainages, open space, as well as various low density or rural developed areas. Species using these areas include aquatic, terrestrial, and avian species.

The proposed project will not interfere with the movement of native wildlife. The project site is immediately north of SR-116 (Gravenstein Highway), a heavily-used commuter route, and west of Alder Avenue, both of which are pre-existing barriers to wildlife movement. In addition, the project site is surrounded by existing uses. As such, development of the project site will not impact any (significant or regional wildlife corridor. The project site is a formerly developed parcel that has been subjected to disturbance over the past 20 years. Overall, the project site is highly disturbed by grading and horticultural cultivation and developed with buildings or hardscape-areas. While the project site may provide movement habitat for local mammals, most of these mammals are associated with urban settings, such as house cats. Development of the project site will not adversely impact any significant or regional wildlife movement corridor. Therefore, impacts due to a conflict with a movement corridor would be less than significant.

5.4(e) (Conflict with Local Ordinances) Less Than Significant with Mitigation: The City of Cotati's Tree Preservation and Protection Ordinance (Chapter 17.54 of the Municipal Code) contains provisions to preserve and protect native and non-native trees. The provisions of the ordinance apply to the removal or relocation of any tree with a circumference of 12 inches or more, measured at 54 inches above natural grade. The removal of a native oak with a trunk circumference of 12 inches measured at 54 inches above natural grade shall be prohibited, except where approved by the council after a public hearing in compliance with Chapter 17.88 (Public Hearings) of the zoning code, in conjunction with the approval of a subdivision or other specific development project. In addition, the removal of a tree with a height of 50 feet or more shall not occur between April 15 and June 15 of any year, to provide for the nesting and stopover patterns of raptors, migratory birds, and other bird species (Cotati Municipal Code 17.54(D)).

Of the 56 trees inventoried and evaluated in the Tree Preservation and Mitigation Report, project construction would involve the removal of 22 trees and the preservation of 34 trees. The 22 trees proposed for removal include: two (2) Coast Redwoods; 13 Valley Oaks; one (1) Black Walnut; one (1) Arborvitae; one (1) Western Cottonwood; three (3) Black Acacias; and one (1) Silver Maple. Approximately 19 of the trees proposed for removal are considered protected trees under the City of Cotati's Tree Preservation and Protection Ordinance.

Prior to the removal of any protected tree, a Tree Permit must first be obtained from the City under Section 17.54.030 and mitigated in accordance with Section 17.54.050 of the Municipal Code. In accordance with the Tree Preservation and Protection Ordinance, **Mitigation Measure BIO-8** requires the replacement of the protected trees proposed for removal (approximately 19). The replacement required under BIO-8 includes approximately 140, 15-gallon Valley Oak trees and approximately 28, 15-gallon trees of a species determined by the City of Cotati, to offset the removal of the protected trees. With BIO-8, the project will be in compliance with the City's Tree Protection Ordinance and potential impacts due to removal of protected trees will be offset by replacement plantings of the same species. Therefore, impacts would be reduced to levels below significance. No other impacts relating to local policies or ordinances will occur as a result of the project.

5.4(f) (Conflicts with Habitat Conservation Plans) Less Than Significant Impact: Sonoma County does not have any California Regional Conservation Plans, as identified in the California Department of Fish and Wildlife's (CDFW) Natural Community Conservation Planning (NCCP) Map.⁷ The Santa Rosa Plain Conservation Strategy Plan (SRPCSP) and the Recovery Plan were reviewed to assess the project's potential to impact any protected plant or animal species. The SRPCSP mapping (Figure 3 dated 4.16.2007) shows that the project site is in an area designated as "Future Development." The project site is not located within a "Conservation Area" of the Santa Rosa Plain according to the Recovery Plan (Figure 1 dated 5.30.2015). Accordingly, the USFWS anticipated that this project site would be developed when it prepared the Conservation Strategy.

The USFWS 2007 Programmatic Biological Opinion is based on the biological framework presented in the Conservation Strategy. Projects that require a Corps permit, that remain consistent with objectives stated in the Conservation Strategy, can be appended to the Programmatic Biological Opinion at the discretion of the USFWS. Projects that are appended to the Programmatic Biological Opinion will be provided individual take authorization for impacts to federally-listed species.

As described in 5.4 (a-b) above, development of the proposed project will result in impacts to California tiger salamander habitat and habitat for three vernal pool plants (Sonoma Sunshine, Burke's goldfields, and Sebastopol meadowfoam). Mitigation Measures BIO-3 and BIO-4 require the applicant to purchase conservation credits for these special-status species at replacement to impacts ratios identified in the USFWS' 2007 Programmatic Biological Opinion (or any successor Programmatic Biological Opinion). Therefore, the project does not conflict with any local policies or adopted conservation plans, and impacts resulting from a conflict with an adopted conservation plan from project implementation would be considered less than significant.

Mitigation Measures:

BIO-1: In the event that the special-status survey identifies presence of rare plants, then areas onsite where special status species are present shall be avoided through site design modifications that preclude development into sensitive habitat areas. In the event that avoidance cannot be achieved then a mitigation plan shall be developed in consultation with USFWS and CDFW. If the plant is state listed (CESA) then an incidental take permits (ITP, 2081 agreement) shall be acquired from the CDFW prior to any grading activity. All provisions of the ITP shall be verified by the City of Cotati prior to the issuance of grading permits. Alternatively, at the discretion of CDFW for state listed species, compensatory credits at an approved mitigation bank or the preservation of offsite habitat may be determined to be an acceptable means of mitigation. Proof of the purchase of mitigation credits shall be provided to the City of Cotati prior to issuance of grading permits.

BIO-2: In the event that the special-status survey identifies presence of a CNPS Rank 1B or 2 plant species and removal cannot be avoided, then a qualified botanist shall collect the seeds, propagules, and top soils, or other part of the plant that would ensure successful replanting of the population elsewhere. The seeds, propagules, or other plantable portion of all plants shall be collected at the appropriate time of the year. Half of the seeds and top soils collected shall be appropriately stored in long-term storage at a botanic garden or museum (for example, Luther Burbank Home & Gardens).

The other half of the seeds, propagules, or other plantable portion of all plants shall be planted at the appropriate time of year (late-fall months) at an off-site protected property. The applicant shall retain a qualified biologist to conduct annual monitoring surveys of the transplanted plant population for a five-year period and shall prepare annual monitoring reports reporting the success or failure of the transplanting effort. These reports shall be submitted to the City of Cotati and appropriate resource

⁷ California Regional Conservation Plans, prepared by California Department of Fish and Wildlife, October 2017, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, Accessed October 12, 2018.

agency (CDFW and/or USFWS) no later than December 1st each monitoring year. Alternatively, at the discretion of the City of Cotati for CNPS species, compensatory credits at an approved mitigation bank or the preservation of offsite habitat may be determined to be an acceptable means of mitigation. Proof of the purchase of mitigation credits shall be provided to the City of Cotati prior to issuance of site grading permits.

BIO-3: Since the project requires a Corps permit, even with the two plus years of negative rare plant surveys, a 1.5:1 replacement to impacts vernal pool listed plant habitat ratio must be met by the project provided: 1) the Programmatic Biological Opinion (2007) remains valid when the project is constructed; 2) a Corps permit is required for the project; and 3) the Corps/USFWS allows use of the 2007 Programmatic Biological Opinion (or any successor Programmatic Biological Opinion). The project will impact 0.06-acre of "suitable vernal pool rare plant habitat." Thus, the applicant shall secure 0.09-acre credits for Sebastopol meadowfoam (or as otherwise allowed by the Corps/USFWS) from the Sebastopol meadowfoam Core Area (Exhibit A; USFWS 2016). Any rare plant conservation credits purchased for the project shall be approved by the USFWS prior to the purchase of the credits. The applicant shall be required to provide proof that these conservation credits have been purchased to the City of Cotati prior to commencement of grading on the project site.

BIO-4: According to the USFWS' 2007 Programmatic Biological Opinion, the portions of the 5.63-acre project that constitutes over summering or migration habitat of the California tiger salamander that are greater than 500 feet and within 2,200 feet of a known breeding site, and for projects beyond 2,200 feet from a known breeding site, but within 500 feet of an adult occurrence, would be mitigated at a 2:1 replacement to impacts ratio. Approximately 1.99 acres of the 5.63-acre project site is currently developed with buildings or hard-packed, gravel-impregnated roadways and parking areas around buildings. These developed surfaces do not constitute California tiger salamander habitat that warrants mitigation. In consideration of these mitigation ratios and the already developed surfaces that do not constitute California tiger salamander habitat on the project site, to compensate for impacts to 3.64 acres of California tiger salamander habitat that would occur from development of the project site, the Programmatic Biological Opinion (USFWS 2007) requires that applicant purchase 7.28 acres of California tiger salamander mitigation credit from a USFWS (and CDFW) approved Conservation Bank or as otherwise directed by the USFWS.

In accordance with the USFWS' Recovery Plan (USFWS 2016) the applicant shall secure credits from the West Cotati Core California tiger salamander area (see Exhibit B of Biological Resource Analysis). Any conservation credits purchased for the project shall be approved by the USFWS prior to the purchase of the credits. The applicant shall be required to provide proof that these California tiger salamander conservation credits have been purchased to the City of Cotati prior to commencement of grading on the project site. In lieu of conservation bank credits, the applicant may preserve extant occupied California tiger salamander habitat in the West Cotati Core California tiger salamander area via recordation of a perpetual conservation easement. Any preservation plan would have to be approved by the USFWS and the CDFW.

To ensure that migrating California tiger salamanders do not end up within the project site while under construction where they could be killed, prior to grading the project site, the developer shall surround the project site in California tiger salamander exclusion fencing. This fencing shall be inspected daily by a qualified biologist or a trained construction manager. In the event that a California tiger salamander is found trapped up against the fence and must be moved, it shall only be moved by a qualified 10(a)(1)(A) federally permitted and a state permitted California tiger salamander biologist. Any such relocation would be as permitted the USFWS and CDFW in their Incidental Take Permits issued to the project that address impact to the California tiger salamander. Copies of the USFWS' Biological Opinion (Incidental Take Permit) and of the CDFW's 2081 Incidental Take Permit shall be provided to the City of Cotati prior to the commencement of grading on the project site.

BIO-5: To avoid impacts to special-status bats, a qualified biologist shall conduct a pre-construction survey of the structures and trees that would be impacted by the project 15 days prior to removal or commencement of ground work. All bat surveys shall be conducted by a biologist with experience surveying for bats. If no special-status bats are found during the surveys, then building demolition and tree removal may commence. Per the recommendation of the CDFW, trees shall be trimmed and/or removed in a two-phased removal system conducted over two consecutive days. The first day (in the afternoon), limbs and branches would be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices or deep bark fissures would be avoided, and only branches or limbs without those features would be removed. On the second day, the entire tree would be removed.

If special-status bat species are found roosting on the project site, the biologist shall determine if there are young present (i.e., the biologist should determine if there are maternal roosts). If young are found roosting in any tree or structure that will be impacted by the project, such impacts should be avoided until the young are flying and feeding on their own. A non-disturbance buffer installed with orange construction fencing should also be established around the maternity site. The size of the buffer zone should be determined by a qualified bat biologist at the time of the surveys. If adults are found roosting in a tree or structure on the project site but no maternal sites are found, then the adult bats can be flushed or one-way eviction doors can be placed over any tree cavity (or structure access opening) supporting bat access for a 48-hour period prior to the time the tree or structure in question would be removed or disturbed. At that point, no other mitigation compensation would be required.

BIO-6: In order to avoid impacts to nesting birds, site preparation activities including the removal of trees and building demolition shall occur outside of the bird-nesting season (September 1- January 31), otherwise pre-construction nesting bird surveys shall be conducted. To avoid impacts to nesting raptors and passerines, a nesting survey shall be conducted 15 days prior to commencing with construction work if this work would begin between February 1 and August 31. The nesting survey shall be conducted on the project site and within a zone of influence around the project site. The zone of influence includes those areas off the project site where raptors could be disturbed by earth-moving vibrations or noise. The nesting survey should include examination of all suitable nesting habitats within 300 feet of the entire project site. A nest survey report shall be prepared upon completion of the survey and provided to the City of Cotati with any recommendations required for establishment of protective buffers as necessary to protect nesting birds.

If birds are identified nesting on or within the zone of influence of the construction project, a qualified biologist shall establish a temporary protective buffer around the nest(s). The buffer must be of sufficient size to protect the nesting site from construction-related disturbance and shall be established by a qualified ornithologist or biologist with extensive experience working with nesting birds near and on construction sites. Typically, adequate nesting buffers are 75 feet from the nest site or nest tree dripline for small birds and up to 300 feet for sensitive nesting birds that include several raptor species known from the region of the project site. The nest buffer should be staked with orange construction fencing or orange lath staking.

No construction or earth-moving activity shall occur within any established nest protection buffer prior to September 1 unless it is determined by a qualified ornithologist/biologist that the young have fledged (that is, left the nest) and have attained sufficient flight skills to avoid project construction zones, or that the nesting cycle is otherwise completed. In the region of the project site, most species complete nesting by mid-July. This date can be significantly earlier or later and would have to be determined by the qualified biologist. At the end of the nesting cycle, and abandonment of the nest by its occupants, as determined by a qualified biologist, temporary nest buffers may be removed, and construction may commence in established nesting buffers without further regard for the nest site.

BIO-7: The applicant shall compensate for the loss of wetlands via the purchase of wetland credit from a Corps- and RWQCB-approved wetland mitigation bank. The applicant shall mitigate for project- related impacts to 0.06-acre of waters of U.S./State via the purchase of 0.10-acre of wetland credit, or as otherwise necessary to mathematically round upwards in acreage to the smallest rare plant credit available that compensates at no less than a 1:1 impacts to mitigation ratio. This is the minimum mitigation acreage. This credit acreage may be modified by the Corps and/or RWQCB and will appear as a condition of issued permits from these agencies. Should the mitigation requirements differ in the conditions of issued Corps and RWQCB permits, these conditions must be implemented by the project. Proof of the purchase of wetland mitigation credits shall be provided to the City of Cotati, the Corps, and the RWQCB in advance of grading activities on the project site.

BIO-8: The project applicant/contractor shall ensure that trees to remain onsite are protected in accordance with the Section 17.54.040 of the City's Municipal Code and that trees to be removed are replaced in accordance with Section 17.54.050 of the City's Municipal Code as follows:

1. In order to protect trees that will be preserved (both onsite and offsite) from injuries that may result from construction activities such as root, trunk or branch damage or harm during grading and trenching, the following shall be implemented:
 - Establish a tree protection zone (tpz) to be inspected and verified by a qualified arborist;
 - Install tree protection fencing and signage around the tpz prior to construction;
 - Restrict demolition, soil grading, trenching, and parking of vehicles within the tpz;
 - Cover exposed soil under canopies and throughout the tpz with mulch;
 - Monitor soil moisture to ensure that soil remains moist to a depth of 18";
 - Conduct pruning by qualified personnel in accordance with current industry standards; and
 - Monitor all trenching and excavation activities inside the tpz by a qualified arborist.
2. The removal of trees with a height of 50 feet or greater shall not occur between April 15 and June 15.
3. In order to mitigate the removal of the protected trees (approximately 19), the applicant shall include the planting of approximately 140 (15-gallon Valley Oak trees) and approximately 28 (15-gallon trees of a species determined by the City of Cotati), onsite as part of the project's proposed landscaping or at a location determined by the City in agreement with the applicant. If onsite planting is not feasible, the applicant may be allowed to pay an in-lieu fee, at the sole discretion of the City. (The impacted trees and mitigation schedule per the City of Cotati Tree Ordinance are shown in Table A of the Biological Resource Analysis. The mitigation schedule may be modified by the City of Cotati.)

5.5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

pursuant to § 15064.5?

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

☐
☒
☐
☐

Sources: City of Cotati 2013 General Plan; General Plan EIR; and Cultural Resources Study, prepared by Tom Origer & Associates, June 23, 2016.

Cultural Resources Setting:

Cotati's historic and cultural resources contribute to the City's unique character and identifiable sense of place. The City and Sphere of Influence (SOI) contain resources that date to the inhabitation of the Coastal Miwok and Pomo Indian tribes and a number of resources that visibly chronicle the evolution of the City from early settlement through today. Such resources include buildings, structures, landscapes, sites and objects. While no formal historic resource inventory has been completed, a total of 75 separate cultural resource studies have been performed. Thirty-six resources within Cotati's SOI have been individually recorded as a result of the various cultural resource studies. Of those 36 recorded, seven (7) are Native American archeological sites, two (2) are historic era archeological sites, and 27 are historic era built resources. Of the 36 recorded resources, 31 are located within the City limits. As stated in the General Plan EIR, the entire Planning Area is considered sensitive for prehistoric Native American archaeological sites.

As shown on General Plan EIR Figure 3.4-1: Sensitive Archaeological Areas, the project site is in an area considered sensitive for prehistoric archaeological deposits. The project site is not located within the Historic Corridor. As shown in Figure 3.8-1: Watersheds of the General Plan EIR, the project site is located approximately 0.4 mile southwest of the Laguna de Santa Rosa and approximately 0.6 mile east of Washoe Creek.

Cultural Resources Study

Tom Origer & Associates conducted a Cultural Resources Study for the proposed project (**Appendix F**). The study included archival research at the Northwest Information Center (NWIC), Sonoma State University (NWIC File No. 15-1481), examination of the library and files of Tom Origer & Associates, field inspection of the project site and vicinity, and contact with the Native American community.

The project area has well-draining soils that probably once supported a variety of plants that could have served as food and cover for animals. In addition, fresh water and freshwater resources were available in seasonal creeks. The presence of these attributes suggests that the project area would have been suitable to prehistoric occupants as a place to gather resources and hunt.

Archival Study Findings

Archival research found that a small portion of the study area had been previously surveyed. Six cultural resources are recorded within a quarter-mile of the study area. None of these resources have the potential to extend into the current study area. There are no reported ethnographic sites in the vicinity of the study area. Review of historical maps found no buildings within the study area before 1916. U.S. Geological Survey (USGS) maps published between 1916 and 1944 show one building within the study area: the 1954 map depicts three builds clustered at the intersection of Highway 116 and Alder Avenue.

Field Survey Findings

A field survey was completed by Vicki Beard on April 27, 2016. The approximately 5-acre study area was examined intensively by walking in a zigzag pattern within 10-15 meter corridors. No prehistoric or historical archaeological materials were found within the study area during the field survey. Several old buildings were observed within the study area, including a commercial building that fronts on Highway 116, a residence converted to a bar, and two

residences on Alder Avenue. The buildings on the property were evaluated as part of the study. None appear eligible for inclusion on the California Register and are not considered important historical resources.

Cultural Resources Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.5(a-c) (Historic Resources, Archaeological Resources, Human Remains) Less Than Significant Impact: As shown on General Plan EIR Figure 3.4-1: Sensitive Archaeological Areas, all parcels within the CG Zoning District are considered sensitive for prehistoric archaeological deposits. None of the parcels are located within the Historic Corridor. The proposed zoning text amendment to allow RCFE within the CG zoning district would not result any new or different impacts to cultural resources beyond those previously identified by the City's General Plan EIR. All future development proposals within the CG zoning district, including RCFE facilities, would be subject to General Plan policies including those that afford protection to historic resources, archaeological resources, and human remains. If warranted, a Cultural Resources Study would be required for future development applications through the Use Permit process to identify site-specific historic and archaeological resources. The proposed zoning text amendment would allow for RCFE in areas of the city where similar types of development are currently allowed. Therefore, impacts related to cultural resources from the proposed zoning text amendment to allow RCFE within the GC zoning district would be less than significant.

Residential Care Facility for the Elderly & Commercial Building

5.5(a) (Historic Resources) No Impact: As described above, the project site is not located within the Historic Corridor as identified on Figure 3.4-1 of the General Plan EIR. In addition, the buildings on the property were evaluated as a part of the Cultural Resources Study and none are eligible for inclusion on the California Register. Therefore, no impacts to historic resources would occur from the proposed project.

5.5(b) (Archaeological Resources) Less Than Significant with Mitigation: The study area contains Pleistocene epoch geologic deposits (5.3-2.5 million years ago), which predate human arrival and occupation of California; therefore, there is a low likelihood that buried (subsurface) archaeological deposits could be present within the project site. As described above, during the site survey, no archaeological resources were found on the surface of the project site. However, as described in the General Plan EIR, and as shown on Figure 3.4-1, the project site is in an area considered sensitive for prehistoric archaeological deposits. As such, undiscovered cultural resources within the project site could be encountered during construction activities. **Mitigation Measure CUL-1** provides that a preconstruction cultural resources awareness training be conducted. **Mitigation Measure CUL-2** provides that in the event that archeological resources are encountered during grading or excavation, all ground disturbing activity shall be halted immediately until a qualified archaeologist can evaluate the potential resource and recommend further action. Implementation of measures CUL-1 and CUL-2 will ensure that in the event of accidental discovery the potential for the project to adversely impact or result in a change to the significance of archeological resources would be reduced to less-than-significant levels.

5.5(c) (Discovery of Human Remains) Less Than Significant with Mitigation: No evidence suggests that human remains have been interred within the boundaries of the project site. However, in the event that during ground disturbing activities human remains are discovered to be present, the applicant would be subject to **Mitigation Measure CUL-3**, which mandates the immediate cessation of ground disturbing activities near or in any area potentially overlying adjacent human remains and contacting the Sonoma County Coroner. If it is determined by the Coroner that the discovered remains are of Native American descent, the Native American Heritage Commission shall be contacted immediately. If appropriate, the property owner shall retain a City-qualified archeologist to provide adequate inspection, recommendations and retrieval. Compliance with CA HSC Section 7050.5, as required under state law, and performance of actions therein, will ensure that in the event of accidental discovery of human remains, impacts will be reduced to levels below significance.

Mitigation Measures:

CUL-1: A preconstruction cultural resource awareness training shall be held prior to commencement of ground-disturbing activities in order to familiarize the team with the potential to encounter prehistoric artifacts or historic-era archaeological deposits, the types of archaeological material that could be encountered within the project area, and procedures to follow in the event that archaeological deposits and/or artifacts are observed during construction. Historic-era resources potentially include all by-products of human land use greater than 50 years of age, including alignments of stone or brick, foundation elements from previous structures, minor earthworks, brick features, surface scatters of farming or domestic type material, and subsurface deposits of domestic type material (glass, ceramic, etc.). Artifacts that are typically found associated with prehistoric sites in the area include humanly modified stone, shell, bone or other materials such as charcoal, ash and burned rock that can be indicative of food procurement or processing activities. Prehistoric domestic features include hearths, fire pits, house floor depressions and mortuary features consisting of human skeletal remains.

CUL-2 If during the course of ground disturbing activities, including, but not limited to excavation, grading and construction, a potentially significant prehistoric or historic resource is encountered, all work within a 100 foot radius of the find (or as otherwise directed by a qualified archeologist) shall be suspended for a time deemed sufficient for a qualified and city-approved archeologist to adequately evaluate and determine significance of the discovered resource, confer with tribal representative, as appropriate, and provide treatment recommendations. Should a significant cultural resource be identified, a qualified archaeologist shall prepare a resource mitigation plan and monitoring program to be carried out during all construction activities.

CUL-3 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 shall 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 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 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 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 given access to the site.
 - The descendant identified fails to make a recommendation.
 - The landowner or authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

5.6. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; BAAQMD 2017 Bay Area Clean Air Plan; Sonoma County Regional Climate Action Plan 2020 and Beyond, prepared July 2016; and California Energy Commission various publications.

Energy Setting:

Energy resources include electricity, natural gas and other fuels. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. Energy production and energy use both result in the depletion of nonrenewable resources (e.g., oil, natural gas, coal, etc.) and emission of pollutants. Energy consumption is measured using the British Thermal Unit (BTU). BTU is the amount of energy that is required to raise the temperature of one pound of water by one-degree Fahrenheit. As points of reference, the approximate amount of energy contained in a gallon of gasoline, 100 cubic feet (one therm) of natural gas, and a kilowatt hour of electricity are 123,000 BTUs, 100,000 BTUs, and 3,400 BTUs, respectively.

Electricity

The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts while energy use is measured in watt-hours. For example, if a light bulb has a capacity rating of 100 watts, the energy required to keep the bulb on for 1 hour would be 100 watt-hours. If ten 100-watt bulbs were on for 1 hour, the energy required would be 1,000 watt-hours or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts, which is one million watts, while energy usage is measured in megawatt-hours or gigawatt-hours (GWh), which is one billion watt-hours.

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network. Natural gas

is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet.

California Energy Consumption

According to the California Energy Commission (CEC), total system electric generation for California in 2017 was 292,039 gigawatt-hours (GWh).⁸ California's non-CO₂ emitting electric generation categories (nuclear, large hydroelectric, and renewable generation) accounted for more than 56 percent of total in-state generation for 2017. California's in-state electric generation was 206,336 GWh and electricity imports were 85,703 GWh.

According to the CEC, nearly 45 percent of the natural gas burned in California was used for electricity generation, with the remainder consumed in the residential (21 percent), industrial (25 percent), and commercial (9 percent) sectors. In 2012, total natural gas demand in California for industrial, residential, commercial, and electric power generation was 2,313 billion cubic feet.⁹

According to the CEC, gasoline has remained the dominant fuel within the transportation sector, with diesel fuel and aviation fuels following. In 2016, California consumed approximately 15 billion gallons of gasoline and approximately 3.35 billion gallons of diesel fuel. An increasing amount of electricity is being used for transportation energy, which is chiefly attributed to the acceleration of light-duty plug-in electric vehicles. In 2016, transportation in California, consisting of light-duty vehicles, medium/heavy-duty vehicles, trolleys, and rail transit, consumed approximately 1.53 million megawatt hours (MWh).¹⁰

Sonoma County Climate Action Plan 2020

In 2005, the ten local governments within Sonoma County pledged to reduce GHG emissions community-wide to 25 percent below 1990 levels by 2015 (Cotati adopted 30% by 2015, Resolution 05-66). The Regional Climate Protection Authority (RCPA) was created in 2009 to help each jurisdiction reach its goal. Climate Action 2020 is a collaborative effort led by the RCPA and includes nine cities, the County of Sonoma, and several partner entities to take further actions to reduce GHG emissions community-wide and respond to the threats of climate change.

As presented in the Climate Action Plan 2020, Section 5.2: Cotati, the City of Cotati is focused on infill development and "green" priorities for new building. Energy efficiency is at the core of the City of Cotati's General Plan policies and regulations, see following discussion below. In addition, Cotati requires that all projects comply with the CalGreen Building Code, which is set forth in Municipal Code Chapter 14.04.130 and establishes Tier 1 as mandatory for new residential and non-residential structures.

Cotati General Plan

The proposed project is subject to the goals, objectives, policies, and actions outlined in the Cotati General Plan aimed at reducing energy consumption. The following from the General Plan are particularly applicable to the subject project:

Policy CON 2.10: Encourage local businesses and industries to engage in voluntary efforts to reduce GHG emissions and energy consumption.

⁸ California Energy Commission, Total System Electric Generation (2017)
http://www.energy.ca.gov/almanac/electricity_data/total_system_power.html, Accessed October 17, 2018.

⁹ California Energy Commission, Supply and Demand of Natural Gas in California
http://www.energy.ca.gov/almanac/naturalgas_data/overview.html, Accessed October 17, 2018.

¹⁰ California Energy Commission, 2017 Integrated Energy Policy Report, Publication Number: CEC-100-2017-001-CMF.

Policy CON 2.4: Require new development to install only fireplaces, stoves, and/or heaters to meet current Bay Area Air Quality Management District (BAAQMD) standards.

Objective CON 3A: Achieve a high level of energy efficiency in new buildings and in significant remodels.

Policy CON 3.1: Continue to require all new public and privately constructed buildings to meet and comply with CalGreen Tier 1 standards.

Policy CON 3.2: Support innovative and green building best management practices, including LEED certification, for all new development, and encourage project applicants to exceed CalGreen Tier 1 standards, if feasible.

Policy CON 3.3: Promote the use of alternative energy in new development.

Policy CON 3.4: Incorporate innovative green building techniques and best management practices in the site design, construction, and renovation of all public projects.

Policy CON 3.7: Encourage tree planting, including widespread use of trees as windbreaks to maximize the effects of cooling westerly winds and planting of deciduous trees to help reduce summer temperatures, either in conjunction with new development or through private sector participation.

Policy LU 1.5: Sustainable best management practices (BMP) in green building, stormwater management, and conservation to mitigate infrastructure impacts, while minimizing effects on water, sewer, and energy.

Cotati Municipal Code

The proposed project is subject to the relevant sections of the Municipal Code related to energy conservation, including Chapter 17.51 (Resource Conservation) and Section 14.04.090 (California Energy Code). In particular, the proposed project will be subject to Section 17.51.030 (Citywide energy conservation standard), which requires that the new structures be designed and constructed to achieve a minimum of fifteen percent greater energy efficiency than otherwise required by the California Code of Regulations, Title 24, and to implement the city's sustainable building program adopted by council resolution.

Cotati Energy Consumption

Energy consumption in Cotati is from fuels used for transportation, building energy, wastewater treatment, and water conveyance. In 2010 the average household in the City of Cotati consumed 6,051 kWh of electricity, 395 Therms of Natural Gas, and 60,624 gallons of water.

Energy Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.6(a-b) (Wasteful, Inefficient, Unnecessary Consumption of Energy, Conflict with State or Local Plan) Less Than Significant Impact: The proposed zoning text amendment to allow RCFE within the CG zoning district would not result any new or different impacts to energy consumption beyond those previously identified by the City's General Plan EIR. All future development proposals within the CG zoning district, including RCFE facilities, would be subject to General Plan policies including those that require energy conservation and efficiency. All future development within the CG zoning district, including new RCFE facilities if proposed in the future, would be subject to local policies related to energy conservation including the City of Cotati General Plan and Cotati Municipal Code, such as Section 17.51.030 of the Municipal Code. As such, allowing RCFE within the CG Zoning District would not result in the wasteful, inefficient, and unnecessary consumption of electricity and natural gas. Therefore, energy impacts from the proposed zoning text amendment to allow RCFE within the CG zoning district would be less than significant.

Residential Care Facility for the Elderly & Commercial Building

5.6(a) (Wasteful, Inefficient, Unnecessary Consumption of Energy) Less Than Significant Impact:

Development of the proposed project would involve the use of energy during construction and at operation. Site preparation, grading, paving, and building construction would consume energy in the form of gasoline and diesel fuel through the operation of heavy off-road equipment, trucks, and worker trips. Consumption of such resources would be temporary and would cease upon the completion of construction. Due to the limited scale of the proposed project and the provision to limit idling set forth above in **Mitigation Measure AQ-1** (see Section 5.3 Air Quality) construction activities would not result in inefficient energy consumption during construction. As such, construction-related energy impacts would be less than significant.

Long-term operational energy use associated with the project includes electricity and natural gas consumption associated with the new buildings (e.g., lighting, electronics, heating, air conditioning, refrigeration), energy consumption related to water usage and solid waste disposal, and fuel consumption (gasoline and diesel) by vehicles associated with the project through the generation of new vehicle trips.

The project is subject to local policies related to energy conservation including the City of Cotati General Plan and Cotati Municipal Code. For example, the project would be required to comply with Section 17.51.030 of the Municipal Code, which requires that the new structures be designed and constructed to achieve a minimum of fifteen percent greater energy efficiency than otherwise required by the California Code of Regulations, Title 24, and to implement the city's sustainable building program adopted by council resolution. The proposed project will also conform to Policy CON 3.7, which encourages tree planting to maximize the effects of cooling westerly winds and help reduce summer temperatures. Additionally, the project is subject to **Mitigation Measure GHG-1** (Section 5.8 Greenhouse Gas Emissions), which requires implementation of local measures set forth in the Region's Climate Action Plan, Climate Action 2020 and Beyond. As such, the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of electricity and natural gas during project operation. Therefore, operational-related energy impacts related to electricity and natural gas would be less than significant.

Energy would be consumed through daily activities at operation of the project including the delivery of water for potable and irrigation purposes, heating, cooling, and ventilation systems, solid waste management, and vehicle use. While the long-term operation of the project would result in an increase in energy consumption compared to existing conditions, the project will incorporate design measures (related to electricity, natural gas and water use) in compliance with Title 24, the Cotati General, and the Cotati Municipal Code to minimize energy consumption. Therefore, operation of the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy and impacts would be less than significant.

5.6(b) (Conflict with State or Local Plan) Less Than Significant Impact: As previously described, the proposed project would have a less than significant impact due to a conflict with the 2017 CAP related to energy since, a) the project supports the goals of the CAP in that it limits urban sprawl by proposing development within existing urban limits on an underutilized site; b) includes control measures to reduce construction-related energy consumption by implementing BMPs set forth by BAAQMD; and c) as a residential care facility for the elderly and commercial building subject to the latest building code, the proposed project would not interfere with implementation of the energy control measures identified in the 2017 CAP. Therefore, the project will have less than significant impacts due to a conflict with the BAAQMD 2017 CAP.

In December 2007, the CEC prepared the State Alternative Fuels Plan in partnership with the CARB and in consultation with the other state, federal, and local agencies. The plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce greenhouse gas emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality. As a residential care facility for the elderly and

commercial building that would install energy conservation features, the proposed project would not conflict with or obstruct implementation of the State Alternative Fuels Plan and impacts would be less than significant.¹¹

The City of Cotati requires that all new development demonstrate compliance with CalGreen Tier 1 Building standards. CalGreen Tier 1 reduces energy consumption for heating, air conditioning, and ventilation and requires use of low-water irrigation systems, water efficient appliances and faucets, cool roofs, short- and long-term bicycle parking, electric vehicle charging spaces, outdoor energy performance lighting and other mandatory energy efficiency measures. Prior to issuance of a building permit, the proposed structures onsite will be required to demonstrate compliance with CalGreen Tier 1 standards. Therefore, new structure onsite will not conflict with state or local energy efficiency plans and impacts will be less than significant.

Mitigation Measures: None Required.

5.7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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 Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong Seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹¹ California Energy Commission, Final Adopted State Alternative Fuels Plan, Adopted December 2007, <http://www.energy.ca.gov/ab1007/>, Accessed October 17, 2018.

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; and Geotechnical Feasibility Evaluation, prepared by Miller Pacific Engineering Group, April 15, 2016.

Geology and Soils Setting:

The City of Cotati is located within the San Andreas Fault system, which is 44 miles wide and extends throughout much of the North Bay Area. The nearest active faults to the project site are: Rodgers Creek (4.25 miles east), Healdsburg (13 miles north), Maacama (16 miles north), and San Andreas (16 miles west) (**Figure C-3 in Appendix C**). No active faults directly traverse the City; however, potential exists for geologic hazards citywide associated with ground shaking, including: liquefaction, ground failure, and seismically-induced landslides.

Miller Pacific Engineering Group conducted a Geotechnical Feasibility Evaluation for the project site (**Appendix G**). The Evaluation included a review of readily-available reference documents, a site reconnaissance performed on April 12, 2016 to observe existing conditions, an assessment of geologic and geotechnical hazards, a description of the geologic/geotechnical factors affecting the feasibility of the proposed development, and preliminary design criteria.

Regional geologic mapping by the California Geological Survey indicate the project site is underlain by Pleistocene alluvial fan deposits consisting of undivided silt, clay, sand and gravel. Artificial fill is mapped along SR 116, likely as part of the initial roadway construction. Subsurface conditions at the site consist of recent alluvial deposits, mainly clays and sands. A review of the sandy and clay soils suggests low to moderate plasticity with moderate stiffness. Geologic hazards at the project site include strong seismic ground shaking and potentially expansive soils.

A paleontological resources search performed using the University of California Museum of Paleontology's (UCMP) Miocene Mammal Mapping Project (MioMap) indicated no previous finds of paleontological resources on or in the immediate vicinity of the project site.¹² According to the MioMap database, the closest paleontological find is located approximately 8.75 miles southeast of the project site.

Geology and Soils Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.7(a-f) (Faults, Strong Seismic Groundshaking, Landslides, Erosion, Paleontological Resources) Less Than Significant Impact: As shown on **Figures C-3 through C-5 in Appendix C**, all parcels within the CG Zoning

¹² University of California Museum of Paleontology, Miocene Mammal Mapping Project (MioMap), <http://www.ucmp.berkeley.edu/miomap/>, Accessed February 11, 2019.

District are in a seismically active area. As shown on **Figure C-6**, parcels zoned as CG range from very low to moderate liquefaction¹³ susceptibility. Parcels within the CG Zoning District are relatively flat and have a low potential for landslides (see **Figure C-7**). All future buildings proposed within the CG zoning district including future RCFE buildings are required to be built in conformance with the standards set forth in the most recent California Building Code of Regulations, Title 24, Part 2 (the California Building Code 3.7-20 Chapter 3: Setting, Impacts, and Mitigation Measures [CBC]) and the California Public Resources Code, Division 2, Chapter 7.8 (the Seismic Hazards Mapping Act) to ensure that potential impacts from seismic shaking are less than significant. If warranted, and consistent with General Plan policies SA 2.3 (Require Geotechnical Investigations) and 2.4 (Review by Soils Engineer), a Geotechnical Evaluation would be required through the Use Permit process to identify site-specific geologic conditions and design criteria to mitigate geotechnical hazards. The proposed zoning text amendment to allow RCFE within the CG zoning district is consistent with the General Plan and does not introduce any new or more severe impacts relative to what is currently allowed within the CG zoning district. Therefore, impacts related to geology and soils would be less than significant.

Residential Care Facility for the Elderly & Commercial Building

5.7(a.i) (Faults) No Impact: Fault rupture occurs when the ground surface fractures as a result of fault movement during an earthquake and almost always follows preexisting fault traces, which are zones of weakness. Given that the project site is not part of the Alquist-Priolo Earthquake Fault Zone and no identified active faults traverse the site, there is no expectation that the site would be vulnerable to fault rupture. The nearest faults with surface rupture include the Rodgers Creek Fault and the San Andreas Fault. The Alquist-Priolo Zone of the Rodgers Creek Fault is located approximately 4.8 miles east of the project site (see **Figure C-4** in **Appendix C**). The Alquist-Priolo Zone of the San Andreas Fault is located approximately 16 miles west of the project site. As such, there is no risk of fault-related ground rupture during earthquakes within the limits of the site due to a known Alquist-Priolo Earthquake Fault Zone. Therefore, there are no impacts expected due to fault rupture at the project site.

5.7(a. ii) (Ground-Shaking) Less Than Significant Impact: The proximity of the City of Cotati and the project site to the active Rodgers Creek Fault places it within Zone 8 (Very Strong) of the Modified Mercalli Intensity Shaking Severity Level (**Figure C-5** in **Appendix C**). As such, the project site holds potential to expose people and structures to substantial adverse effects resulting from strong seismic ground shaking. The resulting vibrations would likely cause primary damage to the proposed buildings and improvements with secondary effects being ground failures in loose alluvium or poorly compacted fill. Both the primary and secondary effects pose a potential risk of loss of life or property.

The intensity of earthquake motion will depend on the characteristics of the generating fault, distance to the fault and rupture zone, earthquake magnitude, earthquake duration, and site-specific geologic conditions. Alluvial soil deposits underlie the site. Therefore, a California Building Code (CBC) soil Type of S_D (stiff soil profile) will be utilized to inform design specifications in order to ensure that potential impacts from seismic activity are reduced to less than significant levels. Site Class D requirements include recommendations for foundation types, appropriate structural systems, and ground stabilization strategies.

Conformance with standards set forth in the Building Code of Regulations and the California Public Resources Code will ensure that potential impacts from seismic shaking are less than significant. Adherence to Class D specifications for ground motion parameters, in particular, will ensure that the proposed buildings and associated improvements onsite would not expose people or structures to potential substantial adverse effects, including the

¹³ Liquefaction is a potentially hazardous geological condition where soils temporarily exhibit liquid state properties when exposed to earthquakes (strong seismic events).

risk of loss, injury, or death as a result of seismic activity. Therefore, potential impacts from groundshaking will have a less than significant impact.

5.7(a. iii) (Seismic-related ground failure/liquefaction) Less Than Significant With Mitigation: Liquefaction is a phenomenon associated with fine-grained, loosely-packed sands and gravels subjected to ground shaking as a result of seismic activity. Liquefaction can lead to total and/or differential settlement and is largely dependent upon the intensity of ground shaking and response of soils underlying the site. As shown on Figure 3.5-2 of the General Plan EIR and the Susceptibility Map of the San Francisco Bay Area, the majority of the project site is mapped as having a very low susceptibility to liquefaction, while a small area along the frontage of SR 116 has a moderate liquification potential (**Figure C-6 in Appendix C**).

According to the Geotechnical Feasibility Evaluation, the subsurface conditions include variable alluvial deposits (layers of clayey, sandy and gravelly soils) that may be susceptible to liquefaction. The Geotechnical Feasibility Evaluation recommends that subsurface exploration be performed to confirm the absence of loose, saturated granular layers. As such, the proposed project is required to implement **Mitigation Measure GEO-1**, which requires that all recommendations outlined in the Geotechnical Feasibility Evaluation be incorporated. Further, **Mitigation Measure GEO-2** would be implemented, which would require the preparation of a site-specific geotechnical investigation report prior to the issuance of grading permits to confirm the absence of soils susceptible to liquefaction. GEO-2 also requires that all recommendations of the site-specific geotechnical investigation report be incorporated. With implementation of GEO-1 and GEO-2, hazards related to ground failure and/or liquefaction will be less than significant.

5.7(a. iv) (Landslide) No Impact: The risk of landslide is dictated by several factors including precipitation conditions, soil types, steepness of slope, vegetation, seismic conditions and level of human disturbance. When certain conditions are present, landslides can be triggered as a result of seismic activity. Landslides have been known to occur within Sonoma County, but are typically confined to slopes steeper than 15% and occur in areas underlain by geologic units that have demonstrated stability problems. Based on the site's relatively flat topography, and as shown on Figure 3.5-6 of the General Plan EIR, the project site is located in an area with a very low landslide potential (see **Figure C-7 in Appendix C**). Therefore, the project will have no impacts due to loss of structures or life from landslides.

5.7(b) (Erosion) Less Than Significant Impact: Development of the project will require site preparation and grading activities that will potentially result in soil erosion or the loss of topsoil if not properly controlled. Water and wind serve as the primary catalyst of soil erosion, with steeper slopes intensifying the effects. Vegetation removal as part of the site preparation process as well as grading and ground disturbing activities associated with development can heighten the potential for and accelerate soil erosion.

Project activities are not expected to generate a substantial loss in topsoil but will involve the removal of vegetation such as brush, trees and root systems, and dense growths of grass. Accordingly, construction activities do hold the potential to result in soil erosion if not properly performed.

In order to ensure that potential impacts related to soil erosion are reduced to levels below significance during site preparation and project operation, the applicant shall comply with erosion and sediment control standards as stipulated in Chapter 14.36 of the Cotati Municipal Code which requires, amongst other things, an erosion control plan prepared by a Civil Engineer or other qualified professional that outlines appropriate measures to minimize soil erosion, and sedimentation and that complies with design and construction standards contained in the City's Municipal Code. The applicant is also required to comply with the RWQCB NPDES permit requirements which will further reduce potential for erosion (see **Mitigation Measure HYDRO-1**).

Adherence to uniformly applied development standards, including the preparation of an Erosion and Sediment Control Plan, as well implementation of HYDRO-1, will ensure that any potential impacts due to erosion and sedimentation will be reduced to less than significant levels. Therefore, the project will generate a less than significant impact related to soil erosion or loss of topsoil.

5.7(c,d) (Unstable Geologic Unit, Expansive Soils) Less than Significant With Mitigation: Lateral spreading, lurching and associated ground failure can occur during strong ground shaking on certain soil substrate typically on slopes. Lurching generally occurs along the tops of slopes where stiff soils are underlain by soft deposits or along steep channel banks whereas lateral spreading generally occurs where liquefiable deposits flow towards a "free face," such as channel banks, during an earthquake.

Given the relatively level slopes throughout the City of Cotati, the potential for lateral spreading is very low. The potential for lateral spreading increases in the foothills and mountains to the east and west of the City. Based on the site's relatively flat topography, the project site has a very low potential for lateral spreading.

During the site reconnaissance, Miller Pacific Engineering Group determined that the surficial soils around the project site seemed to have low to moderate expansive potential. In general, expansive soils tend to swell with increases in soil moisture and shrink as the soil moisture decreases. Changes in soil moisture content can compromise the integrity of foundations, retaining walls and slab on grade improvements from differential movements (settlement or heave).

The proposed project is required to implement **Mitigation Measure GEO-1**, which requires preparation of a site-specific geotechnical investigation report prior to the issuance of grading permits and implementation of design level recommendations including seismic design that uses CBC soil type S_D , expansive soil measures such as compaction, over-excavation, and/or soil replacement/remediation. With implementation of GEO-1, the project would have less than significant impacts due to the presence of expansive soils or a geologic unit or soil that is unstable, or that would become unstable as a result of the project.

5.7(e) (Septic Tanks) No Impact: There are no onsite septic tanks or alternative wastewater treatment facilities proposed as part of the Project. Therefore, there would be no impacts due to the disposal of wastewater where sewers are not available.

5.7(f) (Paleontological Resources) Less Than Significant with Mitigation: The City of Cotati General Plan does not identify the presence of any paleontological or unique geological resources within the boundaries of the City limits. As described above, the closest paleontological find is located approximately 8.75 miles southeast of the project site. Therefore, limited expectation exists for paleontological resources to be present on the project site. Nevertheless, the potential remains for the discovery of buried paleontological resources. Because the potential for inadvertent discovery of paleontological or unique geological resources exists, **Mitigation Measure GEO-2**, as set forth below, shall be implemented. GEO-2 will ensure that proper procedures are followed in the event of a paleontological discovery; thereby reducing potential impacts to levels below significance.

Mitigation Measures:

GEO-1: Prior to issuance of a grading permit, a site-specific geotechnical investigation with subsurface exploration and laboratory testing shall be conducted to provide design-level recommendations and criteria for the project (pursuant to the recommendations of the Geotechnical Feasibility Evaluation prepared by Miller Pacific Engineering Group on April 15, 2016). The geotechnical investigation report shall be prepared and submitted to the City Engineer for review. The site-specific geotechnical investigation shall include, but not be limited to, the following: conduct subsurface exploration to confirm the absence of loose, saturated granular layers; and evaluate and provide recommendations for expansive soil mitigation measures. All recommendations of the site-specific geotechnical investigation report shall be incorporated into the project design, construction documents and improvement plans, or as otherwise determined by the City Engineer and/or Chief Building Official. The project's geotechnical engineer shall inspect the construction work and shall certify to the City, prior to issuance of a certificate of occupancy, that the improvements have been constructed in accordance with the geotechnical investigation report.

GEO-2: In the event that paleontological resources, including individual fossils or assemblages of fossils, are encountered during construction activities all ground disturbing activities shall halt and a qualified paleontologist shall be procured to evaluate the discovery and make treatment recommendations.

5.8. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; BAAQMD 2017 Bay Area Clean Air Plan; BAAQMD CEQA Guidelines 2017; Sonoma County Regional Climate Action Plan 2020 and Beyond, prepared July 2016; and Evaluation of Air Quality and Greenhouse Gas Emissions, prepared by Illingworth & Rodkin, January 9, 2018.

Greenhouse Gas Setting:

Greenhouse gases (GHGs) are generated from natural geological and biological processes and through human activities including the combustion of fossil fuels and industrial and agricultural processes. GHGs include carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₃), chlorofluorocarbons, hydrofluorocarbons and perfluorocarbons.

While GHGs are emitted locally they have global implications. GHGs trap heat in the atmosphere, which heats up the surface of the Earth. This concept is known as global warming and is contributing to climate change. Changing climatic conditions pose several potential adverse impacts including sea level rise, increased risk of wildfires, degraded ecological systems, deteriorated public health, and decreased water supplies.

To address GHG's at the State level, the California legislature passed the California Global Warming Solutions Act in 2006 (Assembly Bill 32), which requires that statewide GHG emissions be reduced to 1990 levels by 2020. Executive Order S-3-05 provides the California Environmental Protection Agency with the regulatory authority to coordinate the State's effort to achieve GHG reduction targets. S-3-05 goes beyond AB 32 and calls for an 80 percent reduction below 1990 levels by 2050. Senate Bill 375 has also been adopted, which seeks to curb GHGs by reducing urban sprawl and vehicle miles traveled.

The BAAQMD CEQA Air Quality Guidelines, which included thresholds of significance for greenhouse gas emissions, were most recently updated in May 2017. With release of the 2017 Bay Area Clean Air Plan (CAP) and the associated EIR, updated thresholds and guidelines are under preparation but have not yet been released. In the absence of updated guidelines and thresholds, based upon its own judgment and analysis, the City of Cotati recognizes these thresholds represent the best available scientific data and has elected to rely on BAAQMD Guidelines dated May 2017 in determining screening levels and significance.

Based on the current BAAQMD Guidelines, a project is considered to have a less-than-significant impact due to GHG emissions if it:

1. Complies with an adopted Qualified GHG Reduction Strategy;
2. Emits less than 1,100 metric tons (MT) CO₂e per year; or
3. Emits less than 4.6 MT CO₂e per service population per year (residents and employees).

The City of Cotati has developed a Greenhouse Gas Emissions Reduction Action Plan (described below); however, this plan only applies to City actions and not those of private developments. Therefore, because the City of Cotati does not have a qualified GHG Reduction Strategy pursuant to the BAAQMD Guidelines, the thresholds set forth in the BAAQMD Guidelines are used to assess significance.

Sonoma County Climate Action Plan 2020

As presented in the Sonoma County Climate Action Plan 2020, the City of Cotati's GHG inventory in 2010 resulted in the emission of 52,060 metric tons of CO₂e per year (MT CO₂e/yr) and a per capita emission level of 7.2 MT CO₂e/yr. A backcast effort identified 1990 emission levels at 51,480 MT CO₂e/yr and a per capita emission level of 9.0 MT CO₂e/yr. **Table 4** presented below provides the forecast emission levels for the City of Cotati.

Table 4: GHG Emission Forecasts

	2020 Forecast	2040 Forecast	2050 Forecast
Total Emissions	61,350	68,980	70,900
Per Capita Emissions	7.9	7.8	7.5

Sonoma County Climate Action Plan 2020 Table 5.2-3 Cotati Community.

The City of Cotati will achieve GHG reduction targets through a combination of state, regional and local measures. At the state level, fuel efficiency standards, Title 24 building standards, low carbon fuel standard, and RPS are estimated to achieve a GHG reduction of 13,710 MTCO₂e by 2020. Regional efforts are projected to achieve a GHG reduction of 4,070 MTCO₂e through activities carried out by the Regional Climate Protection Authority, Sonoma County Water Agency, County of Sonoma Energy Independence Office, Sonoma County Transportation Authority, and Sonoma Clean Power. Locally, the City of Cotati is expected to realize a GHG reduction of 1,550 MTCO₂e through implementation of Measure 11-L1 (Senate Bill SB X7-7 – Water Conservation Act of 2009), Measure 2-L4 (Solar in Existing Non-Residential Buildings), and Measure 2-L2 (Solar in Existing Residential Buildings).

On March 27, 2018, the Cotati City Council adopted Resolution 2018-15 reaffirming its intent to reduce GHG emissions as part of a coordinated effort through the Sonoma County Regional Climate Protection Authority.

Greenhouse Gas Emissions Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.8(a-b) (Significant GHG Emissions, Conflict with GHG Plan) Less Than Significant Impact: The proposed zoning text amendment to allow RCFE within the CG zoning district would not result in any new or different impacts to GHG emissions beyond those previously identified by the City's General Plan EIR. All future development proposals within the CG zoning district, including RCFE facilities, would be subject to General Plan policies including those that promote GHG reductions. All future development within the CG zoning district, including new RCFE facilities, would be subject to local policies such as implementation of BAAQMD-recommended best management practices to control for fugitive dust, which also reduce GHG emissions. In addition, future developed within the CG zoning district including new RCFE buildings would be subject to policies and regulations related to GHG emissions set forth in the City of Cotati's General Plan and BAAQMD's CEQA Air Quality Guidelines. As such, allowing RCFE facilities as conditionally permitted uses within the CG Zoning District would not result in significant GHG emissions nor would it conflict with the GHG Reduction Plan. Therefore, impacts related to GHG emissions would be less than significant.

Residential Care Facility for the Elderly & Commercial Building

5.8(a) (Significant GHG Emissions) Less Than Significant Impact: The proposed project will result in the generation and emission of GHGs during construction and operation. Construction will result in GHG emissions from heavy-duty construction equipment, worker trips, and material delivery and hauling. Construction GHG emissions are short-term and will cease once construction is complete.

The BAAQMD has not established thresholds of significance for GHG emissions resulting from construction activities. Rather, BAAQMD encourages the incorporation of best management practices to reduce GHG emissions during construction. As stated under the air quality topic above, mitigation measures AQ-1 and AQ-2 shall be implemented.

For operational impacts, the BAAQMD recommends applying screening criteria based on development type before conducting a detailed estimation of whether a project would have a potential for exceeding the GHG emission thresholds. The screening criteria were derived using default assumptions as well as modeling for indirect emissions (e.g., electric generation, solid waste, and water use). Projects below the screening criteria are considered to emit GHG emissions below the threshold of significance at operation.

Table 5: BAAQMD Greenhouse Gas Screening

Land Use Type	Project	BAAQMD Screening Level	Above Screening Level?
Congregate Care Facility	122 du	143 du	No
Pharmacy/drugstore w/o drive through	4 ksf	10 ksf	No

Source: Bay Area Air Quality Management District, CEQA Air Quality Guidelines, May 2017, Table 3-1, pg. 3-2.

Note: du = dwelling unit ; ksf=1,000 square feet

As presented in Table 5 above, the screening level for a Congregate Care Facility is 143 dwelling units. The project proposes the development of a RCFE with 122 units and 4,000 square feet of commercial uses, which is below the screening thresholds for criteria pollutants. Further, CalEEMod modeling for the proposed project (included in **Appendix D**) shows that total direct and indirect GHG emissions from the project would be 556 metric tons CO₂e per year during operation in 2020. This is well below the threshold of 1,100 metric tons CO₂e annually. Therefore, the project will have less than significant impacts due to GHG contribution at operation.

5.8(b) (Conflict with GHG Plan) Less Than Significant Impact with Mitigation: As a residential care facility for the elderly with 4,000 square feet of commercial uses, the proposed project is generally consistent with applicable local plans, policies, and regulation related to GHG emissions and does not conflict with the stipulations of AB 32, the applicable air quality plan, or any other State or regional plan, policy, or regulation of an agency for the purpose of reducing greenhouse gas emissions.

The City implements a range of regulatory vehicles in order to reduce GHG emissions in the city from existing and future sources. For example, all new construction is required to implement CalGreen Mandatory plus Tier 1 standards, which include a detailed list of green building features that address energy efficiency, water efficiency, waste reduction, material conservation and indoor air quality. The City is committed to implementing local GHG reduction measures identified in the Region’s Climate Action Plan, Climate Action 2020 and Beyond. In order to ensure that the project contributes towards the incremental implementation of Climate Action 2020 and Beyond, **Mitigation Measure GHG-1** shall be implemented. Measure GHG-1 requires that the project install energy

efficient lighting, plant shade trees onsite, install onsite solar photovoltaic, provide sidewalks, onsite bike parking, and a transit stop near the site, develop a demand management program for employees, and provide electric vehicle charging stations onsite.

The proposed project will provide 16 parking spaces for bicycles and five vehicle parking spaces will be equipped with electric vehicle charging equipment. In addition, the project includes pedestrian walkways that will allow for future sidewalk connections and construction of a new bus transit stop. Further, the project is a mixed-use development located along a major transit corridor (SR 116). As proposed and with Mitigation Measure GHG-1, the project implements local and regional effort to minimize GHG emissions. Therefore, the Project's impacts due to a conflict with local, regional and statewide GHG control plans would be reduced to less than significant levels.

Mitigation Measures:

GHG-1: In order to ensure consistency with the Regional Climate Action Plan, Local Cotati Measures set forth in the Climate Action 2020 and Beyond shall be implemented including the following:

- Install energy efficient outdoor lighting (Measure 1-L2)
- Plant onsite shade trees (Measure 1-L3)
- Provide onsite solar (Measures 2-L1 and 2-L3)
- Install a transit stop on SR 116 (Measure 4-L2)
- Develop a Demand Management Program for employees (Measure 5-L1)
- Provide electric vehicle charging stations onsite (Measure 7-L1)

5.9. HAZARDS/HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 of public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; and EnviroStor and GeoTracker Databases (accessed 10/17/18).

Hazardous Material Setting:

The California Department of Toxic Substances Control (DTSC) defines a hazardous material as: "a substance or combination of substances that, because of its quantity, concentration or physical, chemical, or infectious characteristics, may either: 1) cause, or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating illness; or 2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed." Regulations governing the use, management, handling, transportation and disposal of hazardous waste and materials are administered by Federal, State and local governmental agencies. Pursuant to the Planning and Zoning Law, DTSC maintains a hazardous waste and substances site list, also known as the "Cortese List."

Hazardous waste management in Cotati is administered by the Sonoma County Waste Management Agency (SCWMA), through the Countywide Integrated Waste Management Plan. The Certified Unified Program Agency (CUPA) program oversees five hazardous materials programs: Hazardous Materials Management Plans (HMMP) program, California Accidental Release Prevention (CalARP) program, underground storage tank (UST) programs, aboveground storage tank (AST) programs, and hazardous waste generation and disposal. The California Department of Industrial Relations, Division of Occupational Safety and Health (DOSH) (formerly known as Cal/OSHA), is charged with enforcement of state regulation and the supervision of workplaces in California that are not under direct federal jurisdiction. State worker health and safety regulation applicable to construction workers include training requirements for hazardous waste operation and emergency response.

There are several sites within the City's Planning Area that are included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. These sites have a history of contamination with hazardous materials and are subject to various state and federal laws and regulators, including the CERCLA, EPA, DTSC, and RWQCB. As presented in the General Plan EIR, of the 20 sites listed pursuant to Government Code Section 65962.5, 14 have completed all required clean-up measures and have had their cases closed. Only six sites remain as open cases and are under various levels of remediation and clean-up compliance.

A review of available records, databases (EnviroStor and GeoTracker) and reports demonstrate that the project site is not listed as a known contamination site and that surrounding contamination sites are not expected to have impacted the subject site. The Cotati Rod and Gun Club is located approximately 1.0 mile west of the project site and is an inactive voluntary cleanup site for soil contamination. Preliminary investigations indicated that groundwater and surface water on the site were not affected. The project site is located approximately 0.8 mile

south of Outer Landing Field, which was historically used as a landing field during World War II. Based on records research, interviews, and site inspections, no hazards or potential environmental liabilities were identified from the past use by the Department of Defense that would pose an immediate risk to the environment or public.¹⁴ No further action was required for the site as of January 23, 2015. One open "Leaking Underground Storage Tank (LUST) Cleanup Site," the BP Service Station located at 8510 Gravenstein Highway, is approximately 0.3 mile southeast of the project site. The site was remediated and has been under Verification Monitoring since October 13, 2010. There are no open "Cleanup Program Sites" in the vicinity of the proposed project.

The California Department of Forestry and Fire Protection (CAL FIRE) is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. CAL FIRE's Statewide and County maps (adopted November 2007) depict Fire Hazard Severity Zones (FHSZs) that are within the State Responsibility Area (SRA). The SRA is the area of the state where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within city boundaries or in federal ownership. The FHSZs in the SRA are further classified as being Moderate, High, or Very High.

In addition, CAL FIRE has prepared and transmitted recommendations for Very High FHSZs in those areas where local governments have financial responsibility for wildland fire protection, known as Local Responsibility Areas (LRA). Only lands zoned as Very High FHSZ are identified within the LRA. The City of Cotati in its entirety, including the project site, is categorized as Non-VHFHZ by CAL FIRE (**Figure C-8 in Appendix C**).

Hazards/Hazardous Materials Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.9(a-g) (Hazardous Materials, Hazardous Material Sites, Public Airport, Emergency Response Plan, Wildland Fire) Less Than Significant Impact: The proposed zoning text amendment would allow for Residential Care Facilities for the Elderly within the CG Zoning District, where similar types of facilities (e.g., commercial, retail, residential and lodging) are currently allowed. All future buildings proposed within the CG zoning district including future RCFE buildings would be required to comply with all existing federal, state and local safety regulations governing the transportation, use, handling, storage and disposal of potentially hazardous materials. If warranted, a Phase I Environmental Site Assessment would be required through the Use Permit process to identify site-specific hazardous conditions on the project site. As shown on **Figure C-8 in Appendix C**, all parcels zoned as CG are categorized as Non-VHFHZ by CAL FIRE. The proposed zoning text amendment to allow RCFE within the CG zoning district is consistent with the General Plan and does not introduce any new or more severe impacts relative to what is currently allowed within the CG zoning district. Therefore, impacts related to hazards and hazardous materials would be less than significant.

Residential Care Facility for the Elderly & Commercial Building

5.9(a,b) (Routine Transport, Upset and Accident Involving Release) Less Than Significant Impact with Mitigation: Site preparation and construction activities will result in the temporary presence of potentially hazardous materials including, but not limited to fuels and lubricants, paints, solvents, insulation, electrical wiring, and other construction related materials onsite. Although these potentially hazardous materials may be present onsite during construction, the applicant is required to comply with all existing federal, state and local safety regulations governing the transportation, use, handling, storage and disposal of potentially hazardous materials. Once construction is complete there will not be any ongoing use or generation of hazardous materials onsite.

During site preparation and construction activities, Best Management Practices (BMPs) will be implemented in accordance with the Cotati Municipal Code Chapter 13.68 Storm Water Ordinance. BMPs include measures to

¹⁴ Vincent, Gerald, U.S. Army Corps of Engineers, Letter to Carolyn Tatoian-Cain, DTSC, dated May 25, 2014.

prevent spills and require onsite materials for cleanup. The applicant is required to comply with all federal and state regulations as overseen by Sonoma County's CUPA.

Construction of the proposed project involves demolition and removal of existing buildings, structures, and other improvements onsite. Given the age of existing buildings, there is a potential that asbestos-containing materials (ACM) and lead-based paints (LBP) may be present. If such materials are present, demolition activities could release ACM and LBP, potentially impacting people and the environment. Compliance with **Mitigation Measure HAZ-1**, which requires an asbestos and lead-based paint survey prior to demolition of the existing structures and the implementation of Occupational Safety and Health Administration (OSHA) procedures for removal and disposal, will ensure potential impacts related to ACMs or LBP from demolition activities are reduced to less than significant levels.

The project site contains groundwater wells and may potentially support one or more buried underground (septic) tanks. To ensure that groundwater is protected during well removal or abandonment **Mitigation Measure HAZ-2** shall be implemented, which requires that existing wells be properly decommissioned per applicable Sonoma County regulations. Similarly, any underground holding tanks, septic or otherwise, shall be removed and properly disposed of in accordance with Sonoma County regulations (**Mitigation Measure HAZ-3**). Implementation of measures HAZ-1 through HAZ-3 and compliance with other required regulations governing hazardous materials, will ensure that potential hazards to the public or the environment due to upset or accidental release of hazardous materials, will be reduced to less than significant levels.

The proposed RCFE and Commercial Building may generate or use hazardous waste, including pharmaceuticals, syringes, needles, and other medical products during operation. **Mitigation Measure HAZ-4** requires that in the event that the project involves the on-site storage of potentially hazardous materials in sufficient quantities, a Hazardous Materials Business Plan shall be submitted to the Sonoma County Fire and Emergency Services Department Hazardous Materials Division. Compliance with required regulations governing hazardous materials will ensure that potential hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials at project operation will be less than significant.

5.9(c) (Emit or Handle Hazardous Materials Within ¼ Mile of School) Less Than Significant Impact: Thomas Page Academy is located approximately 0.25 mile southwest of the project site. The proposed residential care facility for the elderly may generate or use hazardous waste, including pharmaceuticals, syringes, needles, and other medical products during operation. The commercial building, which will be used as a cannabis dispensary, is not expected to generate or use potentially hazardous materials or waste. Nonetheless, any significant amount of hazardous materials handling or storage will require a Hazardous Materials Business Plan. Compliance with required regulations governing hazardous materials and wastes will ensure that potential hazards to nearby schools at operation will be less than significant.

5.9(d) (Existing Hazardous Material Sites) No Impact: The California Environmental Protection Agency (CAL-EPA) annually updates the California Hazardous Waste and Substances Site List (also known as the "Cortese List"). The Department of Toxic Substances Control (DTSC) compiles a record of sites to be included on the list, which is then submitted to the CAL-EPA. A search of EnviroStor, performed on October 17, 2018, showed no active cleanup sites within the project vicinity. A search of Geotracker, performed on October 17, 2018, showed one open "LUST Cleanup Sites" and no open "Cleanup Program Sites" in the vicinity of the proposed project. The LUST Cleanup Site (BP Service Station) is located approximately 0.3 mile southeast of the project site. The site was remediated and has been under Verification Monitoring since October 13, 2010. There is no indication of spills, leaks, or contaminated soils on the project site. The project will not create a significant hazard to the public or the environment by virtue of it being located on an identified Cortese site. Therefore, the project will have no impacts due to existing hazardous materials onsite or in the vicinity.

5.9(e) (Public Airport Land Use Plans) No Impact: The project is not located within the boundaries of an airport land use plan; the nearest airports are the Petaluma Municipal Airport located approximately 9 miles southeast of the project site, and the Charles M. Schulz - Sonoma County Airport located approximately 13 miles north of the project site. Therefore, the project would have no impacts associated with airport-related hazards.

5.9(g) (Impair Emergency Response Plan) No Impact: The project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Site plans include ingress and egress access driveways with adequate width necessary to accommodate emergency vehicles and provide connectivity to the existing circulation and street system. California has developed an emergency response plan to coordinate emergency services by federal, state, and local government, including responding to hazardous materials incidents. The State Office of Emergency Services (OES) employs a Hazardous Materials (HazMat) Division which enforces multiple programs that address hazardous materials. There are no aspects of the proposed project that will interfere with an adopted emergency or evacuation plan. Therefore, the project will have no impacts due to a conflict with the emergency response plan.

5.9(h) (Wildland Fire Hazards) Less Than Significant Impact: Wildland fires are of concern particularly in expansive areas of native vegetation of brush, woodland, grassland. The project site is located within the City's UGB, is categorized as a Non-VHFBZ by CAL FIRE and surrounded by land designated as Non-VHFBZ on all sides. While the project site is surrounded by roadways and developed land uses, it is also surrounded by large expanses of grassland. In addition, the project site is located approximately 0.25 mile from land that is designated as "Moderate Fire Hazard Severity Zone" by CAL FIRE (**Figure C-8 in Appendix C**). As such, the project could potentially expose people or structures to impacts related to wildland fires.

The Rancho Adobe Fire Protection District (RAFPD) is responsible for protecting life, property, and the environment from fire. The RAFPd responds to calls including structure, wildland, and other fires. Service is provided by three stations located at 1 East Cotati Avenue; 11000 Main Street in Penngrove and 99 Liberty Road in Petaluma. The project site is located approximately 1 mile driving distance of the fire station located at 1 East Cotati Avenue.

The RAFPd has automatic aid agreements with neighboring districts, including the California Department of Forestry (CDF), the City of Rohnert Park and the City of Petaluma. The CDF provides automatic aid for emergency incidents in the west portions of the District and to State Responsibility Area fires. CDF will also provide fire response to anywhere in the District at the District's request. Under the automatic aid agreement between RAFPd and the City of Rohnert Park, the City of Rohnert Park responds to certain structure fire, water-flow alarm-sounding, vegetation, and vehicle collision calls in the RAFPd service area, including locations in Cotati, and RAFPd provides the City of Rohnert Park with a battalion chief and/or engine and personnel support for certain calls in the City of Rohnert Park. As such, the City of Cotati is well served by fire protection services, which will be extended to the proposed project.

New buildings and structures introduced onsite will be constructed in accordance with the latest building and fire code standards including fire prevention elements such as site design, interior sprinkler systems, fire resistant building materials, onsite fire hydrants and water pressure. Therefore, impacts related to the exposure of people or structures to a significant risk of loss, injury or death involving wildland fires will be less than significant.

Mitigation Measures:

HAZ-1: To avoid potential impacts related to the release of asbestos-containing materials or lead-based paint, an asbestos survey adhering to sampling protocols outlined by the Asbestos Hazard Emergency Response Act (AHERA) and lead-based paint screening shall be conducted prior to demolition of the existing structures. In the event that such substances are found, the applicant shall be subject to requirements set forth by the Occupational Safety and Health Administration (OSHA) AHERA requirements, lead standard contained in 29 CFR 1910.1025 and 1926.62, and any other local, state, or federal regulations. Treatment, handling, and disposal of these materials shall adhere to all requirements established by OSHA and other agencies.

HAZ-2: The existing groundwater wells onsite shall be properly abandoned or decommissioned in accordance with applicable regulations established by the County of Sonoma (Permit & Resource Management

Department). A deconstruction permit shall be obtained from the County of Sonoma and all provisions therein shall be implemented.

HAZ-3: Any buried holding tanks including septic systems shall be properly decommissioned in accordance with applicable regulations established by the County of Sonoma (Permit & Resource Management Department). Removal of underground tanks shall be immediately followed by backfill in accordance with Engineering recommendations. Materials shall be properly disposed of at permitted facilities.

HAZ-4: In the event that the project involves onsite storage of potentially hazardous materials in sufficient quantities, a Hazardous Materials Business Plan (HMBP) shall be prepared and submitted to the Sonoma County CUPA agency for review and approval. The applicant shall fully comply with all provisions of a HMBP should one be required.

5.10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern on 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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

☐☐☒☐

Sources: City of Cotati 2013 General Plan; General Plan EIR; and Initial Storm Water Low Impact Development Submittal, prepared by Adobe Associates, Inc., December 3, 2018.

Hydrology and Water Quality Setting:

The project site is located within the North Coast hydrologic region, which covers approximately 19,500 square miles and includes all portions of Modoc, Siskiyou, Del Norte, Trinity, Humboldt, Mendocino, Lake, and Sonoma counties, and small areas of Shasta, Tehama, Glenn, Colusa, and Marin counties. The project site is also located within the Russian Hydrologic Unit, which covers approximately 950,249 acres. More specifically, the project site is located within the Upper Laguna de Santa Rosa subarea (Russian), which encompasses 39,712 acres.

The City of Cotati has one water body listed on the 2010 Section 303(d) list of impaired water bodies. Section 303(d) of the Federal Clean Water Act requires States to identify waters that do not meet the water quality standards or objectives and thus, are considered "impaired." Once listed, Section 303(d) mandates prioritization and development of a total maximum daily load (TMDL). The Laguna De Santa Rosa is listed as a category 5 segment, meaning that it is a water segment that is impaired and a TMDL is required. Pollutants listed for this segment include: indicator bacteria, mercury, nitrogen, dissolved oxygen, phosphorous, sedimentation/siltation, and temperature. TMDLs for the pollutants listed above are currently under development by the North Coast Regional Water Quality Control Board (RWQCB).

The City of Cotati is subject to flooding along creeks and drainages that traverse city limits. The Laguna de Santa Rosa and Cotati Creek are the most prominent drainages in Cotati that are subject to flooding. The 100-year floodplain extends onto many properties that are located immediately adjacent to these drainages. Additionally, land to the west of US 101 in the northern part of the City, and a portion of the Downtown Specific Plan Area, is within the 500-year floodplain.

The Federal Emergency Management Agency's (FEMA's) flood hazard mapping program provides important guidance for the City in planning for flooding events and regulating development within identified flood hazard areas. FEMA's National Flood Insurance Program is intended to encourage State and local governments to adopt responsible floodplain management programs and flood measures. As part of the program, the FEMA defines floodplain and floodway boundaries that are shown on the Flood Insurance Rate Maps (FIRMs).

Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre, but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ from the State Water Resources Control Board.¹⁵ Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer.

Surface water quality is regulated by the North Coast RWQCB via the Water Quality Control Plan for the North Coast Region (Basin Plan). The RWQCB is responsible for implementing Section 401 of the Clean Water Act through the issuance of a Clean Water Certification when development includes potential impacts to jurisdictional areas such as creeks, wetlands or other Waters of the State.

¹⁵ State Water Resources Control Board, Construction General Permit Order 2009-0009-DWQ, http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml, Accessed October 17, 2018.

Chapter 13.68 of the Cotati Municipal Code regulates stormwater discharge. Grading and erosion control requirements are set forth in chapter 14.36 of the Municipal Code. Low Impact Development (LID) requirements establish limitations on the stormwater runoff generated by development sites. New development is required to mimic pre-developed conditions, protect water quality and retain runoff from impervious surfaces onsite in accordance with the Santa Rosa Storm Water Low Impact Development Technical Design Manual (LID Manual).

As shown in Figure 3.8-1: Watersheds of the General Plan EIR, the project site is located approximately 0.4 mile southwest of the Laguna de Santa Rosa and approximately 0.6 mile east of Washoe Creek. As shown in Figure 3.8-2: Flood Hazard Map of the General Plan EIR, the project site is located within the 500-year Flood Zone (0.2% annual chance flood hazard). The project site is located in FEMA Zone X, 0.2% Annual Chance Flood Hazard, as delineated on map numbered 06097C0878E (**Figure C-9 in Appendix C**).

Hydrology and Water Quality Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.10(a-e) (Violate Water Quality Standards, Decrease Groundwater Supplies, Substantially Alter Drainage Pattern, Conflict with Water Quality Control Plan) Less Than Significant Impact: All parcels within the CG Zoning District are located within the 500-year Flood Zone (0.2% annual chance flood hazard). There are no surface streams, rivers, canals or ditches located within the CG zoning district. Parcels within the CG Zoning District that are unimproved experience sheet flow runoff downgradient that ultimately flow towards rights-of-way and/or storm drain infrastructure. Improved parcels are generally developed within onsite facilities that capture runoff and convey flows to the storm drain system.

All future construction activities, within the CG zoning district including future RCFE buildings are required to adhere to erosion control requirements stipulated in the NPDES Permit issued by the RWQCB. These requirements include the preparation and implementation of a SWPPP that contains BMPs to control erosion, siltation, and contamination impacts to water quality. All future development proposed within the CG zoning district including future RCFE buildings are required to be built in conformance with the latest Low Impact Development Standards and demonstrate that runoff from new impervious surfaces introduced onsite will be treated, captured and storage in a manner that mirrors pre-development conditions. The proposed zoning text amendment to allow RCFE within the CG zoning district does not result in any physical development that would alter water quality or stormwater runoff. Further, the zoning text amendment does not introduce any other changes that would affect regulation of water quality or stormwater relative to what is currently required within the CG zoning district. Therefore, impacts related to hydrology and water quality would be less than significant.

Residential Care Facility for the Elderly & Commercial Building

5.10(a) (Violate Water Quality Standards, Otherwise Degrade Surface or Ground Water Quality) Less Than Significant Impact with Mitigation: Construction activities have the potential to result in runoff that contains sediment and other pollutants that could degrade water quality if not properly controlled. Sources of potential pollution associated with construction include fuel, grease, oil and other fluids, concrete material, sediment, and litter. These pollutants have the potential to result in impacts due to chemical contamination from the release of construction equipment and materials that could pose a hazard to the environment or degrade water quality if not properly managed.

In order to ensure that proper controls and treatment are in place to prevent pollutants from entering stormwater runoff, the project shall adhere to NPDES requirements including the preparation and implementation of a SWPPP and compliance with the RWQCB Order No. R1-2009-0045, Waste Discharge Requirements. Erosion control requirements are stipulated in the NPDES Permit issued by the RWQCB. These requirements include the preparation and implementation of a SWPPP that contains BMPs. The purpose of the SWPPP is to identify potential sediment sources and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination impacts would not occur during construction activities.

Mitigation Measure HYDRO-1 below requires that the project implement a SWPPP with BMPs that include but are not limited to fiber roll protection at all drains, the use of gravel at access driveways during construction, designated washout areas, and the development and implementation of a hazardous materials spill prevention plan. These and other BMPs are designed to protect water quality from potential contaminants in stormwater runoff emanating from construction sites. With implementation of HYDRO-1, the project's potential to result in a violation of water quality standards during construction would be reduced to levels below significance.

An Initial Storm Water Low Impact Development (LID) Submittal was prepared for the proposed project (**Appendix H**). As stated therein, runoff from new impervious areas introduced onsite will be collected and discharged to onsite treatment facilities. A rain garden is proposed in the interior of the parking area with a gravel infiltration basin below to provide treatment/bio-retention and stormwater detention. In addition, gravel infiltration trenches are proposed along the northwestern and northeastern edges of the project site to provide retention. The proposed EVA and parking area along the northern edge of the property line will be constructed with pervious paving to allow runoff to infiltrate beneath the paving. Additional storm water pollution prevention measures include: designing landscaping to prevent sediment from entering the storm drain system; incorporating Integrated Pest Management principles and techniques for design and maintenance; containing litter and trash; maintaining a stabilized construction entrance; and street sweeping.

The installation of the rain garden, gravel infiltration trenches, preparation of a SWPPP (per HYDRO-1), and adherence to best management practices for erosion control during construction activities will ensure that water quality standards and waste discharge requirements are met. No violations of any water quality standards or waste discharge requirements are expected, and implementation of the project is not expected to substantially degrade surface or groundwater quality. Therefore, impacts to water quality would be reduced to less than significant levels.

5.10(b) (Groundwater Supply and Recharge) Less Than Significant Impact: The Residential Care Facility for the Elderly and commercial building will utilize potable water from the City's water system for all onsite water needs including indoor use and outdoor irrigation. Potable water supplies will be provided to the site via connection to the existing 10-inch water main pipeline located within Alder Avenue. The proposed project will increase water demand relative to existing water use on the site. However, the use of highly efficient appliances and fixtures for interior water use and smart controller and irrigation for outdoor water demand will minimize the new water demand generated onsite. The project's water demand is consistent with the City's overall water demand that is anticipated by the City of Cotati 2013 General Plan and Urban Water Management Plan. Groundwater reserves will not be significantly impacted by the proposed development as no groundwater extraction will occur onsite, nor is the project located in a groundwater recharge area. Therefore, the project will have a less than significant impact to groundwater supplies and recharge and would not impede sustainable groundwater management of the basin.

5.10(ci – civ) (Erosion or Siltation, Flooding On- or Off-site, Storm Drain Capacity, Impede or Redirect Flood Flows) Less Than Significant Impact: The proposed project will not alter the course of a stream or river. A ruderal herbaceous community comprises the majority of the project site and includes grasses and forbs (herbaceous flowering plants). The soils in the project area are moderately well-draining clay loams with a clay subsoil underlain by old terrace-alluvium.¹⁶ Impervious surfaces currently occupy a portion of the project site including hardscape area of gravel and buildings. Stormwater currently percolates into the project site where well-draining soils are present and runoff via sheet flow where impervious surfaces exist or as onsite soils become saturated. Excess stormwater runoff from the project site currently flows southeasterly towards Alder Avenue and into the City's existing storm drain system.

¹⁶ Cultural Resources Study, prepared by Tom Origer & Associates, June 23, 2016.

As stated in the Initial Storm Water LID Submittal, the existing project site contains approximately 0.44 acre of impervious surfaces. The total post-project impervious surface area would be approximately 3 acres. As a result, approximately 2.56 acres of new impervious surfaces area will be added onsite as a result of the proposed project.

Runoff from the proposed impervious areas will be concentrated and treated onsite. There will be a rain garden in the interior of the parking area with a gravel infiltration basin below to provide treatment and retention. There will also be gravel infiltration trenches along the northwestern and northeastern edges of the project site to provide retention. The proposed EVA and parking area along the northern edge of the property line will be constructed with pervious paving to allow runoff to infiltrate beneath the paving. Additional storm water pollution prevention measures include: designing landscaping to prevent sediment from entering the storm drain system; incorporating Integrated Pest Management principles and techniques for design and maintenance; containing litter and trash; maintaining a stabilized construction entrance; and street sweeping.

The general direction and pattern of drainage following development will match pre-development conditions. While the proposed project would introduce new impervious surfaces onsite, implementation of the Initial Storm Water LID Submittal would ensure that the proposed project would not substantially increase the rate or amount of surface runoff, nor provide additional sources of polluted runoff. Therefore, the project will not cause substantial erosion or siltation on- or off-site nor will it cause flooding on- or off-site. Impacts to the drainage pattern, storm drain system, or related to polluted runoff as a result of the proposed project would be less than significant. Furthermore, implementation of the proposed project will result in less than significant impacts related to impeding or redirecting flood flows, as the project site and the surrounding properties are not within high risk flood areas.

5.10(d) (Release Pollutants Due to Project Inundation) No Impact: Based on the FEMA's FIRM Panel 06097C0878E, the project site is located in Zone X, 0.2% Annual Chance Flood Hazard. As shown in Figure 3.8-2: Flood Hazard Map of the General Plan EIR, the project site is located within the 500-year Flood Zone, which is considered to be a moderate flood hazard area. As described above, the project proposes onsite stormwater collection and treatment facilities including a rain garden in the interior of the parking area, gravel infiltration trenches along the northwestern and northeastern edges of the project site, pervious paving, and landscaping, all of which minimize the likelihood of the project site being inundated during a flood.

The project site is not located near any large bodies of water that would be susceptible to a seiche. The City of Cotati is sufficiently distant from the San Francisco Bay to preclude effects from a tsunami. Furthermore, according to the California Department of Conservation, the project site is not located within an affected USGS Quadrangle on the Sonoma County Tsunami Inundation Map.¹⁷ Therefore, the project would have no impacts related to the release of pollutants due to project inundation from a tsunami or seiche.

5.10(e) (Water Quality Control Plan or Sustainable Groundwater Management Plan) Less Than Significant Impact: The City of Cotati is within a regional watershed administered by the North Coast RWQCB. The RWQCB has established regulatory standards and objectives for water quality presented in the North Coast Basin Plan, June 2018. There are no sustainable groundwater management plans that include the City of Cotati. As described in 5.10(a), impacts related to water quality or the degradation of surface or groundwater quality are considered less than significant. Therefore, the proposed project will not result in a conflict with or obstruct implementation of the Basin Plan, and impacts are less than significant.

Mitigation Measures:

HYDRO-1: In accordance with the National Pollution Discharge Elimination System regulation, the applicant shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) during all stages of

¹⁷ California Department of Conservation, Sonoma County Tsunami Inundation Maps, <https://www.conservation.ca.gov/cgs/Pages/Tsunami/Maps/Sonoma.aspx>, Accessed February 12, 2019.

construction. The SWPPP shall address erosion and sediment controls, proper storage of fuels, temporary erosion control including fiber rolls, staked straw bales, geofabric, sandbags, and materials for the cleanup of hazardous spills. Sediment shall be retained onsite by a system of sediment basins, traps, or other appropriate measures. A Notice of Intent, fees, and other required documentation shall be filed with the Regional Water Quality Control Board. During construction, a monitoring report shall be conducted weekly during dry conditions and three times a day during storms that produce more than 1/2" of precipitation.

5.11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; and Cotati Bicycle and Pedestrian Master Plan, prepared by Sonoma County Transportation Authority, adopted December 2008, updated April 22, 2014.

Land Use and Planning Setting:

Cotati is predominantly a single-family residential community, with lower (rural) densities located west of Highway 101 and a range of densities from rural residential to higher density multi-family located east of Highway 101. Commercial uses are located downtown along Old Redwood Highway and in commercial centers along Gravenstein Highway and East Cotati Avenue. Offices are located downtown, within the industrial park on the City's northwest border, and along East Cotati Avenue. The Redwood Drive industrial area houses the bulk of the City's warehousing, distribution, and manufacturing uses. Rural and agricultural lands are located to the south and west of Cotati.

The proposed project is subject to land use policies outlined in the Cotati General Plan which has been adopted for the purpose of avoiding or mitigating an environmental effect. The following policies, goals and objectives from the General Plan are particularly applicable to the subject project:

Goal LU-1: Establish an efficient, harmonious, and environmentally sensitive land use pattern that enhances Cotati's small-town character, provides adequate space to accommodate sustainable economic and housing growth, and encourages orderly growth.

Policy LU 1.1: Maintain a supply of developable mixed-use, commercial, industrial, and residential lands sufficient to meet desired growth and economic needs over the planning period.

Objective LU 1B: Ensure that new growth is focused around existing development and does not facilitate the inefficient extension of city services.

Cotati Bicycle and Pedestrian Master Plan

Existing and planned bicycle and pedestrian facilities in Cotati are shown in the Cotati Bicycle and Pedestrian Master Plan, adopted in December 2008 and updated April 2014. The Plan identifies two Pedestrian Districts in Cotati (areas of high activity where pedestrian improvements should be prioritized) including downtown/Old

Redwood Highway between SR 116 and Henry Street, and the area immediately surrounding the Thomas Page Elementary School. Bicycle circulation in Cotati is supported by an existing network of multi-use paths, on-street bike lanes, and bicycle routes. Notable facilities include a segment of the Laguna de Santa Rosa bike path between Commerce Boulevard (in Rohnert Park) and the southern City limits (with one small gap just south of East Cotati Avenue), and on-street bicycle lanes within the City limits on West Sierra Avenue and East Cotati Avenue.

As stated in Objective CI 2A of the General Plan, the City is striving to maintain and develop a network of sidewalks and pathways to provide for safe and convenient pedestrian travel. In particular, Policy CI 2.3 requires development projects to construct sidewalks and walkways on- and off-site in order to maintain consistency with the Cotati Bicycle and Pedestrian Master Plan, and as dictated by the location of transit stops and common pedestrian destinations.

According to the Cotati Bicycle and Pedestrian Master Plan, and as shown on Figure 2.2 of the General Plan, there are no existing bicycle or pedestrian facilities adjacent to the project site. An existing Class III Bike Lane is located along Gilman Ranch Road. A Class II Bike Lane is proposed along SR 116 and W. Cotati Avenue (near SR 116). A pedestrian crossing is proposed at the intersection of SR 116 and Alder Avenue.

Land Use and Planning Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.11(a-b) (Divide An Established Community, Land Use Plan, Policy, Regulation Conflict) No Impact: The proposed zoning text amendment would allow for future development applications to be received for Residential Care Facilities for the Elderly within the CG Zoning District. Under existing conditions, the CG Zoning District currently allows for a variety of similar types of uses including commercial, retail, residential and lodging. Allowing RCFE uses, with a use permit, within the CG district is consistent with the General Plan and would not introduce any conflicts as similar types of uses are already allowed within the CG Zoning District. Therefore, there would be no land use impacts from the proposed zoning text amendment.

Residential Care Facility for the Elderly & Commercial Building

5.11(a) (Divide An Established Community) No Impact: Division of an established community typically occurs when a new physical feature, in the form of an interstate or railroad, physically transects an area, thereby removing mobility and access within an established community. The division of an established community can also occur through the removal of an existing road or pathway, which would reduce or remove access between a community and outlying areas.

The project proposes development on a primarily undeveloped parcel within the City limits that currently contains several structures, including two single-family residences, an old tavern, a workshop/barn structure, and a few small sheds. Ruderal annual grassland and ranchette style housing occurs to the north of the project site. Beyond Alder Avenue to the east, is the existing residential townhouse development called the Cotati Cottages subdivision. Additional residential and commercial development is currently under consideration and was previously evaluated in the South Sonoma Business Park EIR (SCH No. 2000052045) for the property directly east of the project site. To the south of the property, across SR 116, is Shamrock Materials, Inc., a business specializing in stone and concrete building supplies. The Cotati Large Animal Hospital and Cotati Small Animal Hospital are located directly west of the project site.

Construction of the proposed project, which would include a residential care facility for the elderly and a commercial building, would not introduce a new physical feature that would remove mobility and access within an established community. Likewise, the project does not propose the removal of an existing road or pathway that could reduce or remove access between a community and outlying areas. Rather, the proposed project, by constructing pedestrian walkways, would provide a connection between surrounding uses to the north, east, and west, thereby enhancing access. In addition, the project includes rights-of-way dedication along the waste

property boundary, SR 116 and Alder Avenue to accommodate the planned future roadway improvements including a new street, widening of SR 116 and the planned future reconstruction of Alder Avenue as a cul-de-sac. In addition, the project proposed to install frontage improvements that will increase mobility within the community, including the construction of sidewalks, pathways, a transit stop, an eastbound left-turn lane from SR 116 to Alder Avenue and a westbound right-turn taper from SR 116 onto Alder Avenue. Therefore, the project would have no impact due to the physical division of an established community.

5.11(b) (Land Use Plan, Policy, Regulation Conflict) Less Than Significant Impact: The proposed project is required to comply with various policy documents, including the Cotati 2013 General Plan, the City of Cotati's Zoning Ordinance, and the Bicycle and Pedestrian Master Plan. The construction of a residential care facility for the elderly and commercial uses is generally compatible with the current land use and zoning designations for the project site, which are General Commercial (land use) and Commercial, Gravenstein Corridor (zoning). The current zoning designation allows commercial cannabis uses, including retail cannabis uses. The applicant acquired a Commercial Cannabis Permit to operate the dispensary on June 12, 2018 (City Council Resolution 2018-44). With the proposed zoning text amendment included as part of this proposed project, Residential Care Facilities for the Elderly will be allowed within the Commercial, Gravenstein Corridor Zoning Designation, with a Use Permit. The proposed project requires a Use Permit for the RCFE as part of the project entitlement process.

The proposed project is also consistent with the Cotati Bicycle and Pedestrian Master Plan. Within the plan, a Class II Bike Lane is proposed along SR 116 and W. Cotati Avenue (near SR 116) and a pedestrian crossing is proposed at the intersection of SR 116 and Alder Avenue. Construction of the proposed project would not impede the establishment of a Class II Bike Lane along SR 116 or the establishment of a pedestrian crossing at the intersection of SR 116 and Alder Avenue. Rather, the proposed project, by dedicating right of way and by constructing a sidewalk along the site's frontage with SR 116, pedestrian walkways, and providing spaces for bicycle parking, would support the goals of the bicycle and pedestrian master plan.

Overall, the proposed project is consistent with the general policies, goals and objectives of the Cotati General Plan. Therefore, the potential impacts due to a conflict with City of Cotati regulations is less than significant.

Mitigation Measures: None Required.

5.12. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; and Geotechnical Feasibility Evaluation, prepared by Miller Pacific Engineering Group, April 15, 2016.

Mineral Resources Setting: The California Surface Mining and Reclamation Act of 1975 (SMARA) identifies mineral resources within California. These maps identify and classify mineral resources as to their relative value for extraction. To date, no aggregate mineral resources or other significant mineral resources have been mapped within the City of Cotati.

Mineral Resources Impact Discussion:***Zoning Amendment to Allow RCFE within CG Zoning District***

5.12(a-b) (Mineral Resources or Resource Plans) No Impact: There are no known mineral resources within the City of Cotati, and none of the parcels zoned as CG have been delineated as locally important resource recovery sites. Therefore, the proposed zoning amendment will have no impact to mineral resources.

Residential Care Facility for the Elderly & Commercial Building

5.12(a-b) (Mineral Resources or Resource Plans) No Impact: There are no known mineral resources within the City of Cotati. Soil studies conducted as part of the Geotechnical Feasibility Evaluation did not reveal the presence of any mineral resources onsite. The project site has not been delineated as a locally important resource recovery site. The project will not result in the loss of availability of a known mineral resource, including those designated as "locally important." Therefore, the proposed project will have no impacts due to the loss of availability of mineral resources.

Mitigation Measures: None Required.

5.13. NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; and Noise Evaluation, prepared by Illingworth & Rodkin, May 4, 2016.

Noise Setting:

Noise is generally defined as unwanted sound. It is characterized by various parameters that include the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). The sound pressure level is the most common descriptor used to characterize the loudness of an ambient (existing) sound level. The decibel (dB) scale is used to quantify sound intensity but given that the human ear is not equally sensitive to all frequencies in the entire spectrum, noise measurements are weighted more heavily for frequencies to which humans are sensitive in a process called "A-weighting," written as "dBA" and

referred to as "A-weighted decibels". In general, human sound perception is such that a change in sound level of 1 dB cannot typically be perceived by the human ear, a change of 3 dB is just noticeable, a change of 5 dB is clearly noticeable, and a change of 10 dB is perceived as doubling the sound level.

The primary noise sources within the Cotati City limits include vehicular traffic, residential maintenance activities, residential air conditioning units and swimming pool pumps, entertainment venues, child-care centers, gas stations, car washes, school playgrounds, public parks, commercial business activities, and light industrial facilities. Commercial and light industrial uses can generate noise due to regular operations such as fans, blowers, chillers, compressors, boilers, pumps, and air conditioning systems which may run for 24 hours a day. Other sources of noise in these areas, such as horns, buzzers, and loading activities may be intermittent.

The City of Cotati regulates the noise environment through Section 17.30.050 of the Municipal Code, which establishes exterior and interior noise level limits for land uses. The maximum allowable exterior noise level at residential care facilities is 65 dBA Ldn, and the maximum allowable interior noise level is 45 dBA Ldn. The exterior and interior noise limits established in Section 17.30.050 of the Municipal Use Code are consistent with the Land use Compatibility for Community Noise Environment standards identified in the Cotati General Plan. The General Plan also establishes the following relevant goals, objectives, policies, and actions:

Objective N 1A: Minimize Noise Levels to Enhance the Quality of Existing and Future Land Uses.

Policy N 1.1: Ensure the noise compatibility of existing and future uses when making land use planning decisions.

Policy N 1.3: Require development to mitigate excessive noise through best practices, including building location and orientation, building design features, placement of noise-generating equipment away from sensitive receptors, shielding of noise-generating equipment, placement of noise-tolerant features between noise sources and sensitive receptors, and use of noise-minimizing materials such as rubberized asphalt.

Policy N 1.15: Require new development to minimize vibration impacts to adjacent uses during demolition and construction. For sensitive historic structures, a vibration limit of 0.08 in/sec PPV (peak particle velocity) will be used to minimize the potential for cosmetic damage to the building. A vibration limit of 0.30 in/sec PPV will be used to minimize the potential for cosmetic damage at buildings of normal conventional construction.

Policy N 1.6: Support noise-compatible land uses along existing and future roadways, highways, and freeways.

Policy N 1.7: The following criteria shall be used to determine the significance, for projects required by the CEQA to analyze noise impacts, of noise impacts for development, transportation, and other projects that increase noise:

Policy N 1.8: Ensure that new development does not expose indoor sleeping areas to indoor noise levels in excess of 45 dBA Ldn.

Project Specific Noise Assessment

Acoustical consultants, Illingworth & Rodkin performed a Qualitative Evaluation of Noise Issues to assess potential noise impacts associated with the proposed project. The Evaluation also identifies measures to achieve compliance consistent with the City's noise regulation during construction and at operation. The following discussion is based on the findings of the Noise Evaluation (**Appendix I**).

Significance Criteria for Noise

The following summarizes the City of Cotati's significance criteria for assessing project level impacts on the ambient noise environment.

- A significant impact will occur if the project results in an exceedance of the noise level standards contained in this Noise Element, or the project will result in an increase in ambient noise levels by more than 3 dB; and

- A vibration limit of 0.3 inches/second, peak particle velocity (in/sec PPV) to minimize cosmetic damage at buildings of normal conventional construction. For sensitive historic structures, a vibration limit of 0.08 in/sec PPV is established to minimize cosmetic damage to the building; and
- Where existing traffic noise levels are less than 60 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +5 dB Ldn increase in roadway noise levels will be considered significant; and
- Where existing traffic noise levels range between 60 and 65 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +3 dB Ldn increase in roadway noise levels will be considered significant; and
- Where existing traffic noise levels are greater than 65 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +1.5 dB Ldn increase in roadway noise levels will be considered significant.

Noise Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.13(a-c) (Temporary or Permanent Noise Increase, Groundborne Vibration and Noise) No Impact: The proposed zoning text amendment would allow for future development applications to be received for Residential Care Facilities for the Elderly within the CG Zoning District. Under existing conditions, the CG Zoning District currently allows for a variety of similar types of uses including commercial, retail, residential, and lodging. Allowing RCFE uses, with a use permit, within the CG district is consistent with the General Plan and would not introduce any conflicts as similar types of uses are already allowed within the CG Zoning District. The future construction of Residential Care Facilities for the Elderly within the CG Zoning District, would introduce similar uses to those that are currently allowed in the District. As such, allowing RCFE buildings within the CG Zoning District is not anticipated to generate a substantial permanent increase in ambient noise levels, as compared to what is currently allowed in the District. Construction activities for RCFE buildings would be required to control for noise and vibration impacts to sensitive receptors, in accordance with Cotati's General Plan and Zoning Ordinance.

5.13(a) (Temporary or Permanent Noise Increase) Less Than Significant Impact with Mitigation:

Construction Noise

Construction of the proposed project would result in temporary and intermittent noise increases onsite and in the project vicinity from the use of heavy equipment, truck deliveries and off-haul of materials. Construction noise associated with the proposed project would be perceptible to established uses in the immediate vicinity including nearby residences to the north and northeast (approximately 75 feet away), future residents to the east (approximately 50 feet away), and workers/customers of nearby commercial uses to the west and south.

Noise impacts resulting from construction of the project depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), in areas immediately adjoining noise-sensitive land uses, or over extended periods of time.

Construction of the proposed project is anticipated to occur over a 12-month period and would include demolition, site preparation, grading and excavation, trenching, building erection, and paving. During each stage of construction, there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location at which the equipment is operating.

Most demolition and construction equipment generate maximum noise levels within the range of 80 to 90 dBA L_{max} at a distance of 50 feet. Typical hourly average construction-generated noise levels for residential developments are about 81 to 88 dBA Leq measured at a distance of 50 feet from the center of the site during busy construction periods (e.g., earth moving equipment, impact tools, etc.). Hourly average construction noise levels associated with the erection of the proposed buildings, such as hammer- and drilling-related noise, would range from approximately 63 to 71 dBA at a distance of 50 feet. As such, construction noises generated by project

development may occasionally result in temporary increases in ambient noise levels in and around the project site and may occasionally reach intrusive levels.

As such, **Mitigation Measure NOI-1** shall be implemented which requires best construction management practices to reduce construction noise levels emanating from the site, limit construction hours, and minimize disruption and annoyance due to noise exposure. With implementation of NOI-1, exposure of existing residents and commercial uses to excessive noise levels generated during construction activities will be reduced to less than significant levels.

Noise and Land Use Compatibility of Proposed Noise-Sensitive Uses

In accordance with the City's General Plan, which provides ambient noise standards for land uses within city limits, the project was evaluated for compatibility of the proposed noise-sensitive land use (RCFE) with the existing and future ambient noise environment. The project site is located north of SR 116 and west of Highway 101, which are the primary noise sources in the area. The General Plan includes calculations of future traffic noise levels along SR 116 at build out. Traffic noise levels were calculated to range from 70 dBA Ldn at a distance of 140 feet from the centerline of the roadway to 60 dBA Ldn at a distance of 640 feet from the centerline of the roadway. Based on this data, exterior noise levels at the southernmost facades of the proposed RCFE buildings are calculated to range from 65 to 67 dBA Ldn.

The maximum allowable exterior noise level at residential land uses is 65 dBA Ldn, and the maximum allowable interior noise level at residential land uses is 45 dBA Ldn. The exterior noise standard is normally applied to common outdoor use areas, which for the proposed RCFE consists of fully shielded interior open-air courtyards. The acoustical shielding provided by the proposed RCFE buildings would be expected to provide at least 10 dBA of noise reduction, yielding exterior noise levels below the maximum allowable exterior noise level standard of 65 dBA Ldn.

In exterior noise environments ranging from 60 dBA Ldn to 65 dBA Ldn, interior noise levels can typically be maintained below City standards with the incorporation of an adequate forced air mechanical ventilation system in each dwelling unit. Preliminary calculations indicate that this forced air would be applicable to residential units located on the west, north, and east facades of the residential buildings. Standard dual-pane thermal insulating windows/doors with a minimum rating of STC 28 would be sufficient to achieve acceptable interior noise levels.

In order to meet the City's requirement (General Plan Policy N 1.8) for indoor noise attainment for all habitable rooms, **Mitigation Measure NOI-2** shall be implemented. NOI-2 requires that an indoor noise standard of 45 dBA be achieved for all units. This will be accomplished through design-level analysis of exterior doors, windows, walls, and other treatments to determine appropriate sound rating throughout the buildings. To meet the indoor noise standard, units will need to have windows closed to achieve acceptable exterior to interior noise attenuation. As such, units shall be equipped with a suitable form of forced-air mechanical ventilation. With implementation of NOI-2, interior noise levels will be achieved 45 dBA and potential impacts due to a conflict from exposure to excessive ambient noise levels affecting indoor noise environments would be avoided.

Permanent Increase in Ambient Noise Levels

Noise resulting from project-generated traffic would not be expected to substantially increase ambient noise levels in the area. As stated in the Qualitative Evaluation of Noise Issues, a doubling in traffic volumes would be required before there is 3 dBA increase in noise levels, which would be perceived as a detectable increase in noise.

As stated in the Cotati General Plan EIR, existing daily traffic on SR 116 near the City limits averages 17,100 vehicles per day. As discussed in Section 5.17 Transportation, the project is expected to generate an average of 1,264 trips per day, including 51 trips during the a.m. peak hour and 110 during the p.m. peak hour. Based on a comparison between existing traffic volumes and project generated trips, the traffic noise increase would be indistinguishable from existing traffic noise and would be below the noise significance criteria for permanent noise

increases. As such, the project's contribution to the existing ambient noise levels from increased traffic will result in less than significant impacts.

Emergency Vehicles

The proposed RCFE may, on occasion, require emergency vehicle assistance, which may include the use of a siren. However, the RCFE will employ nurses and technicians that are skilled and trained in caring for persons with Alzheimer's, Dementia, and common medical conditions thus the frequency of ambulance calls is not expected to substantially increase noise levels. Typically, ambulance operators utilize sirens on roadways to alert drivers of their presence and minimize siren use when entering or existing private property. At a distance of approximately 50 feet, sirens could reach levels of 92 to 94 dBA Lmax. Sirens used by emergency personnel are typical exempt from noise compatibility standards. While the project will increase the presence of emergency vehicles accessing the site relative to existing conditions, the project will not result a significant permanent increase to ambient noise levels. Sirens from emergency vehicle use will be temporary and infrequent and would be in response to emergencies. Therefore, impacts will be less than significant.

Mechanical Equipment

The proposed project will include mechanical equipment such as heating, ventilation, and air conditioning systems, and are required to achieve standards established by the City's Noise Ordinance thresholds. Section 17.30.050 of the Municipal Code provides that the maximum allowable exterior noise level at residential land uses is 65 dBA Ldn. As currently proposed, mechanical HVAC equipment will be located on rooftops of the Assisted Living and Memory Care Buildings, behind a parapet wall near the sloped asphalt shingle roofing. Rooftop mechanical equipment noise levels for mid-rise structures usually range from 60 to 70 dBA Leq at a distance of 50 feet, assuming direct line of sight between receiver and mechanical equipment. Shielding from parapet walls and the building itself is calculated to provide 10 to 15 dB reduction, as long as the barrier is constructed without any gaps or cracks. Assuming a worst-case scenario with HVAC equipment placed near the eastern edge of the rooftop, the nearest residential property line would be located approximately 80 feet to the east and 140 feet to the northeast, from the HVAC equipment. Given the distance of the residential property lines from the HVAC equipment, and shielding from the parapet walls and building, noise levels at the adjacent residential property lines are not projected to exceed 65 dBA Ldn. Therefore, noise impacts from mechanical equipment will be less than significant.

5.13(b) (Groundborne Vibration and Noise) Less Than Significant Impact: Operation of heavy construction equipment, particularly pile driving and other impact devices such as pavement breakers create seismic waves that radiate along the surface of the earth and are experienced as ground vibration. Vibration from operation of equipment can result in effects ranging from annoyance of people to damage of structures. Varying geology and distances result in different vibration levels containing different frequencies and displacements.

Temporary demolition and construction activities associated with the RCFE project, such as grading and compaction have the potential to generate groundborne vibration. Building construction, paving, and other site improvements will also require the operation of heavy-duty construction equipment, which will contribute to the ambient noise environment. As the project is not expected to require pile driving, equipment such as vibratory rollers, large bulldozers and jackhammers are expected to generate the highest ground vibration levels.

Table 6 below provides the vibration source levels at 25 feet for various types of construction equipment:

Table 6: Vibration Source Levels for Construction Equipment	
EQUIPMENT	PPV AT 25 FEET (IN/SEC)
Vibratory roller	0.210
Large bulldozer	0.089

Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003

Source: Transit Noise and Vibration Impact Assessment, United States Department of Transportation, Federal Transit Agency, Office of Planning and Environment, May 2006.

The nearest existing sensitive receptors to the construction area are the existing residences north and northeast of the site (approximately 75 feet away). Future residences east of the project site (approximately 50 feet away), could potentially be built and occupied prior to construction of the proposed RCFE.

For the proposed project, the only potentially significant source of groundborne vibration would be generated by the short-term construction activities. For the purpose of this analysis, to provide a worst-case scenario, it is assumed that vibratory rollers will be used onsite during construction. As shown in Table 6, at a distance of 25 feet, vibration levels have the potential to reach 0.210 in/sec PPV from the use of a vibratory roller.

Vibration levels are strongest closest to the source and then attenuate with increasing distance. Using the source levels in Table 5, vibration from equipment can be estimated by the following formula: $PPV_{\text{Equipment}} = PPV_{\text{Ref}} (25/D)^n$ (in/sec), where PPV_{Ref} is the reference PPV at 25 feet, D is the distance from the equipment to the receiver in feet, and $n=1.1$, the value related to the attenuation rate through the ground.

The closest existing residential buildings are located approximately 75 feet from the project site. At a distance of 75 feet, vibration levels have the potential to reach 0.063 in/sec PPV at the existing residential structures. In addition, future residential uses may be introduced as close as 50 feet to the project site. At a distance of 50 feet, vibration levels have the potential to reach 0.098 in/sec PPV. As such, groundborne vibration levels are anticipated to be below the established threshold of 0.3 in/sec PPV for vibratory impacts. Therefore, impacts related to exposure of groundborne vibration and/or groundborne noise resulting from project construction will be less than significant.

5.13(c) (Airport Noise) No Impact: The proposed project is not located within two miles of a public airport or public use airport, nor is it located near a private airstrip. As such, residents and workers at the project site would not be exposed to excessive noise levels as a result of being located within an airport land use plan area or within the vicinity of a private airstrip. Therefore, no impacts due to excessive airport noise exposure would occur.

Mitigation Measures:

NOI-1: Due to the proximity of sensitive receptors to the project site, all construction activities shall be required to comply with the following and be noted accordingly on construction plans:

1. Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm on weekdays and 9:00 am and 5:00 pm on Saturdays (if allowed through specific project conditions of approval). No construction shall occur on Sundays or holidays.
2. All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
3. The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
4. At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences.
5. Unnecessary idling of internal combustion engines shall be prohibited.

6. Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
7. The required construction-related noise mitigation plan shall also specify that haul truck deliveries are subject to the same hours specified for construction equipment.
8. Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing.
9. The construction contractor shall designate a "noise disturbance coordinator" who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures as warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.

NOI-2: The following measures shall be implemented to reduce interior noise levels to acceptable levels:

- Provide a suitable form of forced-air mechanical ventilation, as determined by the City of Cotati, for all habitable units, so that windows can be kept closed at the occupant's discretion to control interior noise and achieve the interior noise standards.
- Sound-rated windows and doors, and other treatments including, but are not limited to, sound rated exterior wall construction methods, acoustical caulking, insulation, acoustical vents, shall be required.
- A design-level acoustical analysis shall be performed showing that interior noise levels of 45 dBA or below are achieved. A final determination of the required window and door sound ratings and other treatments shall be made during the Final Design Review phase to assure that the interior noise standard of 45 dBA is achieved.

5.14. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial unplanned 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; U.S. Census Bureau; and Cotati Housing Element, adopted May 19, 2015.

Population and Housing Setting:

According to the City's Housing Element, the population of Cotati has increased steadily over the years, growing from 3,346 persons in 1980 to 7,265 persons in 2010. The decade from 1980 to 1990 experienced the greatest population increase, 71 percent. From 2000 to 2010, the population increased from 6,471 to 7,265 persons, an increase of 1.2 percent per year. According to the U.S. Census Bureau, Population Estimates Program, as of July 1, 2018, the City of Cotati's population was 7,599 people.

Population and Housing Impact Discussion:***Zoning Amendment to Allow RCFE within CG Zoning District***

5.14(a-b) (Substantial Unplanned Growth, Displacement of People or Housing) No Impact: The proposed zoning text amendment would allow for future development applications to be received for Residential Care Facilities for the Elderly within the CG Zoning District. Under existing conditions, the CG Zoning District currently allows for a variety of similar types of uses including commercial, retail, residential and lodging. Allowing RCFE uses, with a use permit, within the CG district is consistent with the General Plan and would not introduce a substantial amount of unplanned growth, nor would it displace people or housing, as RCFE uses are similar to the types and densities of uses already allowed within the CG Zoning District. The future construction of Residential Care Facilities for the Elderly within the CG Zoning District would accommodate senior housing and housing for disabled persons, as identified in the City's Housing Element, in areas that are well served by existing services and infrastructure. Any new RCFE buildings within the CG Zoning District will be reviewed, through the Use Permit process, to ensure that the projects would not induce substantial unplanned population growth at levels beyond what has been anticipated by the City's Planning documents. Therefore, there would be no impact to population and housing from the proposed zoning text amendment.

Residential Care Facility for the Elderly & Commercial Building

5.14(a) (Substantial Unplanned Growth) Less Than Significant Impact: The project site is located within the City limits and will not directly or indirectly induce substantial unplanned population growth. The project proposes the construction of 122 units and 4,000 square feet of commercial uses. The proposed project would employ approximately 65 to 77 workers (an estimated 55 to 67 employees for the RCFE facility and an estimated 10 employees for the dispensary). The projected number of additional residents and workers do not constitute a substantial increase in unplanned population and remains sufficiently below the 2013 General Plan population projections for the City. Development of the project would accommodate residential growth and commercial uses envisioned in the City's guiding planning documents. As a result, the project is consistent with the General Plan.

As detailed in the City's Housing Element, there are two senior housing facilities in Cotati: Charles Street Village, which provides 47 units of lower income senior housing, and Oaks of Hebron Sierra, which is a 6-bed elderly residential care facility. By 2022, approximately 140 additional senior households are anticipated in Cotati. It is anticipated that some of these senior households will be existing Cotati households that age in place and that there will be a need for new senior-oriented housing for approximately 45 to 70 units of the senior household growth. The proposed Assisted Living Facility would introduce 88 new assisted living units, which would contribute to the senior-oriented housing needs identified in the City's Housing Element.

As detailed in the City's Housing Element, housing for disabled persons is provided at Charles Street Village, which includes units accessible to senior disabled households, and Wilford Lane Village, a 36-unit family apartment community that includes several units designed to accommodate disabled persons with special needs. By 2022, approximately 23 new households will have one or more disabled members. The Memory Care Facility would provide 34 units, which would partially satisfy the City's housing needs for disabled persons.

The project site is located within the City limits and would connect to the existing water line within Alder Avenue and the existing sanitary sewer main within SR 116. As such, the project site is well served by existing services and infrastructure and will not require the extension or construction of new utilities to provide adequate service. There are no other elements of the project that would induce growth at levels beyond what has been anticipated by the City's Planning documents. Therefore, the project will have a less than significant impact, directly or indirectly, related to unplanned population growth.

5.14(b) (Displacement of People or Housing) Less Than Significant Impact: The project involves the construction of a residential care facility for the elderly and 4,000 square feet of commercial uses within a primarily undeveloped parcel that currently contains several structures, including two vacant single-family residences, an

old tavern, a workshop/barn structure, and a few small sheds. As such, the proposed project would not displace a substantial number of people or existing housing that would require the construction of replacement housing elsewhere. Therefore, impacts related to the displacement of housing or people would be considered less than significant.

Mitigation Measures: None Required.

5.15. PUBLIC SERVICES

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; and Cotati Housing Element, adopted May 19, 2015.

Public Services Setting:

The City of Cotati is well served by established public services including fire and police protection, schools and parklands. In order to offset the cost of improving or expanding City services to accommodate the demand generated by new development the City charges one-time impact fees on new private development. Development impact fees finance public service improvements and pay for new development's fair share of the costs necessary to maintain acceptable levels of service related to fire and police protection services, open space, parkland and other such public services.

Public Services Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.15(a-e) (Fire Protection, Police Protection, Schools, Parks, Other Public Facilities) Less Than Significant Impact: The proposed zoning text amendment would allow for future development applications to be received for Residential Care Facilities for the Elderly within the CG Zoning District. Under existing conditions, the CG Zoning District currently allows for a variety of similar types of uses including commercial, retail, residential and lodging. Allowing RCFE uses, with a use permit, within the CG district would not adversely impact service ratios, response times or other performance objectives for fire and police protection, schools, and parks. Future

development within the CG district would occur incrementally and would be subject to all General Plan policies and actions including development impact fees (fire suppression facilities impact fees, police facilities impact fees, and park in lieu fees), which offset costs associated with the expansion of public services. Therefore, there would be no public services impacts from the proposed zoning text amendment.

Residential Care Facility for the Elderly & Commercial Building

5.15(a) (Fire Protection) Less than Significant Impact: The project site is served by the Rancho Adobe Fire Protection District (RAFPD). The District was formed in 1993 through the combining of two smaller districts, the Cotati Fire Protection District and the Penngrove Fire Protection District. The RAFPD provides services to the Penngrove, Cotati, and unincorporated areas of Petaluma. RAFPD covers an emergency response area of roughly 86 square miles and serves approximately 28,000 people. Service is provided by three stations located at 1 East Cotati Avenue; 11000 Main Street in Penngrove and 99 Liberty Road in Petaluma. Currently, there are 13 full-time Firefighters, Engineers and Captains; three Battalion Chiefs; 24 part-time Firefighters; one part-time Fire Chief; and one Administrative Manager. At the end of the first year of the merger between the two fire districts in 1993 the call volume was approximately 1,000 calls for service. In 2017, the RAFPD responded to over 2,750 calls for service, an increase of over 5 percent a year since 1993.¹⁸

The RAFPD has automatic aid agreements with neighboring districts, including the California Department of Forestry (CDF) and the City of Rohnert Park. The CDF provides automatic aid for emergency incidents in the west portions of the District and to State Responsibility Area fires. CDF provides fire response to anywhere in the District at the District's request. Under the automatic aid agreement between RAFPD and the City of Rohnert Park, the City of Rohnert Park responds to structure fires, water-flow alarm-sounding, vegetation fires, and vehicle collision calls in the RAFPD service area, including locations in Cotati.

The project site is located approximately 1 mile driving distance of the fire station located at 1 East Cotati Avenue.

As stated in **Section 5.14 Population and Housing**, the project is not anticipated to induce substantial unplanned growth in the area, either directly or indirectly. The increase in residents and workers onsite will incrementally increase demands for fire services. As a Residential Care Facility for the Elderly, it is reasonable to expect that emergency calls (primarily for fire engine support in conjunction with ambulance) will be generated by the proposed land use. New demands on fire service have been previously anticipated as part of General Plan buildout. As a standard condition of project approval, the applicant will be required to pay all applicable development impact fees, including fire suppression facilities impact fees. These funds will be sufficient to offset any cumulative increase in demands to fire protection services. Therefore, impacts to fire protection services will be less than significant.

5.15(b) (Police Protection) Less than Significant Impact: The Cotati Police Department (CPD) is a 24-hour operation providing dispatch, patrol, traffic enforcement, investigation and community crime prevention. The CPD includes a chief, one lieutenant, two sergeants, six officers (a total of 10 officers), one police canine unit, one community services officer, five dispatchers, and one support services supervisor. As of 2018, the ratio of officers to population is approximately 1.27 per 1,000 persons. The City has not formally adopted a police officer to resident population staffing ratio.

Although the project will incrementally increase demands for police services, the project is not anticipated to induce a substantial increase in the demand for police protection services. New demands on police service have been anticipated as part of General Plan buildout. The General Plan includes policies and action to ensure that public services are provided at acceptable level and to ensure that development and growth does not outpace the provision of public services. As a standard condition of project approval, the applicant will be required to pay all

¹⁸ Rancho Adobe Fire Protection District, <https://www.rancho-adobe-fire.org/about-rancho-adobe-fire-protection-district>, Accessed October 17, 2018.

development impact fees, including police facilities impact fees. These funds will be sufficient to offset any cumulative increase in demands to police protection services. Therefore, impacts to police protection services will be less than significant.

5.15(c) (Schools) Less Than Significant Impact: Students in the City of Cotati are served by the Cotati-Rohnert Park Unified School District (CRPUSD). The CRPUSD includes eight elementary schools, two middle schools, and two high schools. The proposed project involves the construction of a residential care facility for the elderly with 122 units and 4,000 square feet of commercial uses. New residents introduced onsite would not generate new student enrollment because the RCFE would serve senior citizens. However, new employees at the RCFE and the commercial building could contribute to student enrollment within the CRPUSD.

The City of Cotati levies School Impact Fees on new development to offset costs associated with the incremental expansion of school facilities. While the project may introduce a limited number of new students, the payment of requisite school impact fees will offset any potential impacts. Fees will be leveraged as student enrollment reaches capacity to expand facilities as necessary. Therefore, impacts to schools from the proposed project will be less than significant.

5.15(d) (Parks) Less Than Significant Impact: The proposed project involves the construction of a residential care facility for the elderly with 122 units and 4,000 square feet of commercial uses. 34 of the units would be located within the Memory Care Facility and are not expected to contribute to parkland use within the City. Residents within the Assisted Living facility and new employees may visit parks within the City of Cotati.

The City's Municipal Code, Section 17.76.030, Park Land Dedication and Fees, establishes a formula to determine how much parkland a new residential development needs to introduce, or alternately, how much they are required to pay in lieu of providing parkland. The project, as proposed, does not include public parkland as part of the project proposal. However, the project does include three internal landscaped courtyards and a public pedestrian plaza. Per the City's code, the applicant will be required to pay park in lieu fees sufficient to offset the project's parkland demand. Park in lieu fees are used by the City to develop and maintain community parklands. Therefore, impacts related to parkland from implementation of the proposed project will be less than significant.

5.15(e) (Other Public Facilities) No Impact: The project will not result in substantial adverse impacts associated with any other public facilities. The project site is within the City limits and is well served by existing public services. The project will not generate a substantial increase in demands that warrant the expansion or construction of other new public facilities. Therefore, no impacts related to other public facilities will occur.

Mitigation Measures: None Required.

5.16. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: City of Cotati 2013 General Plan and General Plan EIR.

Recreation Setting:

The public parks and recreational opportunities within the City accommodate a range of uses and activities that include both active and passive recreation. Park land development and/or park acquisition impact fees are required to offset any potential impacts of the project on parks and open space.

Recreation Impact Discussion:***Zoning Amendment to Allow RCFE within CG Zoning District***

5.16(a-b) (Deterioration of Parks, Additional Recreational Facilities) No Impact: The proposed zoning text amendment would allow for future development applications to be received for Residential Care Facilities for the Elderly within the CG Zoning District. Under existing conditions, the CG Zoning District currently allows for a variety of similar types of uses including commercial, retail, residential and lodging. Allowing RCFE uses, with a use permit, within the CG district would not adversely impact parks or require additional recreational facilities. Future development within the CG district would occur incrementally and would be subject to all General Plan policies and actions including park in lieu fees, which offset costs associated with the maintenance and expansion of parks and recreational amenities. Therefore, there would be no impacts to parks from the proposed zoning text amendment.

Residential Care Facility for the Elderly & Commercial Building

5.16(a) (Deterioration of Parks) Less Than Significant Impact: The project site is located in close proximity to two passive and active recreation facilities. Those located near to the project site include: Thomas Page Academy, located at 1075 Madrone Avenue, with 2 acres of open space adjacent to the school; and Draper Park, located on Wilford Avenue, with 1.5 acres of land containing picnic tables, BBQs, and bicycle/pedestrian paths.

The City aims to provide five acres of parkland per 1,000 residents. In order to maintain adequate park facilities, the project is subject to park-in-lieu fees that will be used to maintain or expand existing parks and/or purchase land and construct planned community parklands. The required payment of in-lieu fees and the City's ongoing maintenance and subsequent development of community parks will ensure that adequate parks and recreational amenities are available to the community. Therefore, impacts due to substantial physical deterioration of parks would be less than significant.

5.16(b) (Additional Recreational Facilities) Less Than Significant Impact: The project is required to pay park in lieu fees, which fund ongoing maintenance and construction of community parks that include passive and active recreational facilities. The environmental impacts associated with the future development of parklands will be reviewed at the time that parklands are proposed for development. The project will provide three internal landscaped courtyards and a pedestrian plaza, which will serve as passive open space. The impacts associated with the onsite courtyards and pedestrian plaza to be developed by the project are analyzed herein and mitigation is presented to reduce construction and operational impacts to levels below significance. Therefore, impacts will be less than significant.

Mitigation Measures: None Required.

5.17. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: City of Cotati 2013 General Plan; General Plan EIR; Focused Traffic Impact Analysis, prepared by W-Trans, April 19, 2019; Cotati Bicycle and Pedestrian Master Plan, prepared by Sonoma County Transportation Authority, adopted December 2008, updated April 22, 2014; and Moving Forward 2040 Sonoma County's Comprehensive Transportation Plan, prepared by Sonoma County Transportation Authority, September 2016.

Transportation Setting:

The project site is located on the northwest corner of the SR 116 (Gravenstein Highway)/Alder Avenue intersection in the City of Cotati, west of Highway 101. The intersection is stop controlled on the Alder Avenue approach and currently lacks crosswalk markings.

Alder Avenue is a two-lane roadway that runs north-south, bound by Blodgett Street on the north and SR 116 on the south. Within the project vicinity Alder Avenue is approximately 28 feet wide and has a posted speed limit of 35 miles per hour (mph).

SR 116 is a state route connecting US 101 in Cotati to SR 1 on the Sonoma Coast in Jenner. Within Cotati, SR 116 is currently a four-lane facility for one-quarter mile between US 101 and Redwood Drive, transitioning to a two-lane highway to the west and along the frontage of the proposed project's site. The posted speed limit is 35 mph to the east of West Cotati Avenue and 45 mph to the west. On-street bicycle lanes and sidewalks exist on both sides of the SR 116 between Old Redwood Highway and Redwood Drive. West of Redwood Drive, SR 116 currently lacks bicycle lanes and sidewalks. The City's Bicycle and Pedestrian Master Plan identify a proposed Class II bike route along SR 116.

As envisioned in the Cotati General Plan, Action CI 1b, a new north-south collector street would be constructed midway between Locust Avenue and Alder Avenue, extending north from Gravenstein Highway to Helman Lane. The new north-south collector street would also extend southward from Gravenstein Highway to intersect with an extension of Isabel Drive. A traffic signal would be installed on the new north-south collector street at the intersection of Gravenstein Highway. Lastly, once a connection between Alder Avenue and the new north-south collector street is established, Action CI 1b, calls for elimination of the Gravenstein Highway/Alder Avenue intersection (i.e., Alder Avenue would no longer connect to SR 116). At buildout of the General Plan Alder Avenue would be accessed from Helman Lane and would be reconfigured to terminate in a cul-de-sac.

W-Trans prepared a focused traffic impact analysis to evaluate the potential transportation impacts for the proposed project (**Appendix J**). Vehicle operating conditions during the a.m. and p.m. peak periods were

evaluated to capture the highest potential impacts for the proposed project as well as the highest volumes on the local transportation network. The morning peak hour occurs between 7:00 and 9:00 a.m. and reflects conditions during the home to work or school commute, while the p.m. peak hour occurs between 4:00 and 6:00 p.m. and typically reflects the highest level of congestion during the homeward bound commute.

Public Transit

Bus service in Cotati is provided by Sonoma County Transit, Golden Gate Transit, and Paratransit. Sonoma County Transit is the primary transit provider in Cotati; it provides regularly-scheduled fixed-route service to major activity centers and transit hubs within the City limits. Golden Gate Transit Routes 74, 80, and 101 serve Cotati with stops located at either the Hub or the St. Josephs Park and Ride. Paratransit, also known as dial-a-ride or door-to-door service, is available for those that are unable to independently use the transit system due to a physical or mental disability.

A bus shelter and turnout are proposed as off-site improvements east of Alder Avenue on SR 116 at the frontage to the Cotati Village Project. The bus shelter proposed is a standard Sonoma County Transit design with a covered roof, bench, and a display window for routing schedule.

Rail Service

Sonoma-Marin Area Rail Transit (SMART) offers passenger rail service in Sonoma and Marin counties. SMART's initial 43 miles of rail corridor includes 10 stations, from the Sonoma County Airport to Downtown San Rafael, and includes a station in Cotati. The full project will provide 70 miles of passenger rail service and a bicycle-pedestrian pathway.

Rail freight operation on the SMART rail corridor is overseen by the North Coast Railroad Authority. Freight service currently operates between Lombard (located in Napa County where the North Coast Railroad Authority interfaces with the national rail system) and Petaluma. Several round-trip freight trains per week are expected to pass through Cotati over the next several years as freight service expands.

Bike and Pedestrian Facilities

Existing and planned bicycle and pedestrian facilities in Cotati are shown in the Cotati Bicycle and Pedestrian Master Plan, adopted in December 2008 and updated April 2014. The Plan identifies two Pedestrian Districts in Cotati (areas of high activity where pedestrian improvements should be prioritized) including downtown/Old Redwood Highway between SR 116 and Henry Street, and the area immediately surrounding Thomas Page Elementary School. Bicycle circulation in Cotati is supported by an existing network of multi-use paths, on-street bike lanes, and bicycle routes. Notable facilities include a segment of the Laguna de Santa Rosa bike path between Commerce Boulevard (in Rohnert Park) and the southern City limits (with one small gap just south of East Cotati Avenue), and on-street bicycle lanes within the City limits on West Sierra Avenue and East Cotati Avenue.

According to the Cotati Bicycle and Pedestrian Master Plan, and as shown on Figure 2.2 of the General Plan, there are no existing bicycle or pedestrian facilities adjacent to the project site. An existing Class III Bike Lane is located along Gilman Ranch Road. A Class II Bike Lane is proposed along SR 116 and W. Cotati Avenue (near SR 116). A pedestrian crossing is proposed at the intersection of SR 116 and Alder Avenue. As stated in Objective CI 2A of the General Plan, the City is striving to maintain and develop a network of sidewalks and pathways to provide for safe and convenient pedestrian travel. In particular, Policy CI 2.3 requires development projects to construct sidewalks and walkways on- and off-site in order to maintain consistency with the Cotati Bicycle and Pedestrian Master Plan, and as dictated by the location of transit stops and common pedestrian destinations.

Sonoma County Comprehensive Transportation Plan

Moving Forward 2040, Sonoma County's Comprehensive Transportation Plan (CTP), is a 25-year plan that serves as the vision for transportation throughout Sonoma County, with goals for the transportation system and the well-

being of the communities. Moving Forward 2040 establishes five goals: maintain the existing public transportation system; relieve traffic congestion; meet targets to reduce greenhouse gas emissions in the transportation sector; increase safety and emphasize health aspects of transportation planning strategies; and reduce travel time and cost and increase mobility in communities of concern. Major roadway projects identified in Moving Forward 2040 relative to Cotati include: updating the US 101 and Railroad Avenue Interchange; widening and rehabilitation of SR 116 between Sebastopol and Cotati; constructing sidewalks along west Cotati Avenue; US 101/SR 116 north bound on-ramp improvements; US 101/West Sierra Avenue south bound off-ramp improvements; and Old Redwood Highway pavement rehabilitation from La Plaza to Gravenstein Highway.

City Roadway and Intersection Impact Criteria

According to the Cotati General Plan Policy CI 1.3, the minimum acceptable Level of Service (LOS) standard for intersections is LOS D. At unsignalized intersections, controlled movements operating at LOS E or LOS F are allowable if 1) the intersection is projected to operate at LOS C or better overall; and 2) the projected traffic volume on the controlled movement is 30 vehicles or less per hour on approaches with single lanes, or on multi-lane approaches, 30 vehicles or less per hour on lanes serving left turns and through movements. Additionally, a significant impact would occur if a project would result in inadequate emergency access, substantially increase a hazard due to a design feature or conflict with adopted policies, plans and programs regarding public transit, bicycle or pedestrian facilities.

Transportation Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.17(a-d) (Conflict with Program, Plan, Policy, Ordinance, CEQA Guidelines §15064.3(b), Design Feature Hazard, Emergency Access) Less Than Significant Impact: The proposed zoning text amendment would allow for future development applications to be received for Residential Care Facilities for the Elderly within the CG Zoning District. Under existing conditions, the CG Zoning District currently allows for a variety of similar types of uses including commercial, retail, residential, and lodging. Allowing RCFE uses, with a use permit, within the CG district is consistent with the General Plan and would not introduce any transportation conflicts. Residential care facilities typically generate fewer daily trips than commercial, retail, or lodging uses because residents do not drive, and trips generated by RCFE type uses are limited to visitors, employees and deliveries. As such, allowing RCFE uses within the CG Zoning District will not generate a substantial increase in vehicle trips. Consistent with the General Plan, Action C1 1r, future development within the CG zoning district including RCFE type uses will be reviewed to ensure that new development facilitates walking, biking and transit nodes, new streets designed to maintain safe and efficient traffic flows, and constructs or contributes funds towards planned improvements. Therefore, impacts related to transportation would be less than significant.

Residential Care Facility for the Elderly & Commercial Building

5.17(a) (Conflict with Program, Plan, Policy, Ordinance) Less than Significant Impact: Construction activities from development of the proposed project would temporarily generate a negligible amount of additional traffic along roadways in the vicinity of the project site caused by construction workers and material deliveries. The increase in vehicle trips during construction is considered minimal and local street capacity would not be significantly affected. Traffic impacts at operation are described below.

Existing Roadway Conditions

As indicated in the analysis prepared for the EIR supporting the Cotati General Plan, the intersection at Gravenstein Highway/Alder Avenue is currently operating acceptably during the morning and evening peak hours. These results are provided in **Table 7** below.

Table 7: Existing Peak Hour Intersection LOS

Study Intersection Approach	AM Peak		PM Peak	
	Delay	LOS	Delay	LOS
Gravenstein Hwy (SR 116)/Alder Ave	0.5	A	0.3	A
<i>Southbound (Alder Ave) Approach</i>	<i>12.8</i>	<i>B</i>	<i>19.0</i>	<i>C</i>

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for the minor approach to a two-way stop-controlled intersection are indicated in *italics*

Baseline Roadway Conditions

Baseline operating conditions were assessed to reflect the addition of traffic associated with the proposed Cotati Village Project, which is located adjacent to the subject project site east of Alder Avenue and north of SR 116. The projected trips associated with the proposed Cotati Village Project was added to the volumes analyzed in the Existing Conditions scenario in order to determine baseline volumes. A new eastbound left-turn lane on SR 116 and separate southbound right turn and left turn lanes on Alder Avenue are included as part of the proposed project. Under these conditions, the study intersection is projected to continue operating acceptably at LOS D or better during the a.m. and p.m. peak hours. The resulting operating conditions are summarized in Table 8 below.

Table 8: Baseline Peak Hour Intersection LOS

Study Intersection Approach	AM Peak		PM Peak	
	Delay	LOS	Delay	LOS
Gravenstein Hwy (SR 116)/Alder Ave	0.8	A	0.7	A
<i>Southbound (Alder Ave) Approach</i>	<i>12.9</i>	<i>B</i>	<i>21.0</i>	<i>C</i>

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for the minor approach to a two-way stop-controlled intersection are indicated in *italics*

Trip Generation

The anticipated trip generation for the proposed project was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 10th Edition, 2017 for "Congregate Care Facility" (ITE LU 253), and "Marijuana Dispensary" (ITE LU 882). As indicated in **Table 9**, the proposed project is expected to generate an average of 1,264 trips per day, including 51 trips during the a.m. peak hour and 110 trips during the p.m. peak hour.

Table 9: Trip Generation Summary

Land Use	Units	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Congregate Care Facility	125 du	2.02	253	0.07	9	5	4	0.18	23	12	11
Marijuana Dispensary	4 ksf	252.70	1,011	5.85	42	23	19	21.83	87	44	43
Total			1,264		51	28	23		110	56	54

Notes: du = dwelling unit; ksf = 1,000 square feet

Daily trips to the RCFE are primarily employees who work shifts that begin and/or end outside the peak periods, deliveries, and guests. The limited number of peak hour trips are associated with office staff who work more traditional hours, and given the relatively low number of such personnel, it is reasonable for the peak hour trip generation to be a small percentage of daily trips.

Trip Distribution

The applied distribution assumptions and resulting trips are shown in **Table 10**. The pattern used to allocate new project trips to the street network was determined by reviewing existing turning movements at the study intersection, observations of neighborhood travel circulation, and familiarity with traffic patterns in the area and surrounding region. A portion of outbound trips heading eastbound on SR 116 are expected to choose to travel a longer distance, going north on Alder Avenue to Helman Lane and south on Redwood Drive in order to make a protected left turn onto SR 116 at a signalized intersection.

Table 10: Trip Distribution Assumptions

Route	Percent	Daily Trips	AM Trips	PM Trips
Alder Ave (North of Ford Ln)	25%	316	13	28
Gravenstein Hwy (West of Alder Ave)	25%	316	13	28
Gravenstein Hwy (East of Alder Ave)	50%	632	25	54
Total	100%	1,264	51	110

Baseline Plus Project Conditions

Under baseline plus project conditions, which consists of existing traffic volumes in addition to trips generated by the proposed Cotati Village Project, the study intersection is expected to operate acceptably overall at LOS A during both peak hours. The stop sign controlled approach on southbound Alder Avenue is expected to operate at LOS B during the a.m. peak hour and at LOS D during the p.m. peak hour. Results are summarized in **Table 11**.

Table 11: Baseline and Baseline plus Project Peak Hour Intersection LOS

Study Intersection <i>Approach</i>	Baseline Conditions				Baseline Plus Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Gravenstein Hwy (SR 116)/Alder Ave	0.8	A	0.7	A	1.1	A	1.7	A
<i>Southbound (Alder Ave) Approach</i>	<i>12.9</i>	<i>B</i>	<i>21.0</i>	<i>C</i>	<i>13.7</i>	<i>B</i>	<i>28.3</i>	<i>D</i>

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for the minor approach to a two way stop-controlled intersection are indicated in *italics*

As demonstrated in the table above, the study intersection is expected to continue operating acceptably upon the addition of project-generated traffic to Baseline Conditions. As explained above, the project includes installation of a new eastbound left-turn lane on SR 116 and separate southbound right turn and left turn lanes on Alder Avenue. The SR 116 improvements will be installed in accordance with the Cotati Village - Offsite Improvement Left Turn Lane & Bus Turnout Plans, dated January 9, 2019, and/or as directed by the City of Cotati Engineer and/or Caltrans. Therefore, the project will have less than significant impact under the baseline plus project condition.

Cumulative Ten-Year Horizon Conditions

Conditions at a horizon ten years into the future were also evaluated in the Traffic Impact Analysis. To achieve the 2029 horizon year volumes, the net 20-year change in volumes was calculated using existing p.m. peak hour volumes at the Gravenstein Highway/Alder Avenue intersection, and p.m. peak hour volumes at the Gravenstein Highway/new north-south street projected at buildout in the Cotati General Plan EIR.

Under future conditions, the Cotati General Plan directs that the intersection of Gravenstein Highway/Alder Avenue be eliminated and replaced with a new signalized intersection at Gravenstein Highway and the new north-south street to the west. The proposed project includes dedication of right-of-way along the site's western boundary for the planned future improvement of the new north-south street, consistent with the City's General Plan. These planned future improvements included in the City's Capital Improvement Program (CIP) and are funded through the collection of Traffic Impact Fees imposed on new development.

The cumulative 10-year horizon conditions analyzed for the subject RCFE & Commercial Building Project assume that Alder Avenue would remain connected to the SR 116 and that the planned future new north-south street would not be constructed. Seventy percent of the changes in volumes through the horizon year of 2035 were assumed to have occurred within the projected 10-year horizon (2029). With no changes to the intersection's geometry or controls other than the SR 116 left-turn lane and the Alder Avenue southbound right and left turn lanes, level of service operation will deteriorate significantly with the regional increase in traffic projected over the next ten years, with or without the Residential Care Facility for the Elderly project.

If, however, the intersection was signalized, the intersection would operate acceptably at LOS B with or without the proposed project. Results of the ten-year horizon condition are summarized in **Table 12**.

Table 12: Ten-Year Horizon with and without Project PM Peak Hour Intersection LOS

Study Intersection <i>Approach</i>	10-Yr. Horizon w/o Project				10-Yr. Horizon with Project			
	Unsignalized		Signalized		Unsignalized		Signalized	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Gravenstein Hwy (SR 116)/Alder Ave	**	F	15.5	B	**	F	19.8	B
<i>Southbound (Alder Ave) Approach</i>	<i>**</i>	<i>F</i>	<i>n/a</i>	<i>n/a</i>	<i>**</i>	<i>F</i>	<i>n/a</i>	<i>n/a</i>

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for the minor approach to a two way stop-controlled intersection are indicated in *italics*, ** = delay in excess of 120 seconds

As demonstrated, operation of the study intersection is anticipated to deteriorate significantly with the increase in traffic projected over the next ten years, with or without the proposed project. Upon signalization, the study intersection is expected to operate acceptably at LOS B.

Under Cumulative Ten-Year Horizon Conditions, and assuming that the planned new north-south street has not yet been constructed, signalization of Gravenstein Highway/Alder Avenue will be necessary in order for the intersection to operate acceptably, with or without the proposed project. As a condition of approval, the applicant shall pay a proportional fair share contribution toward the design and installation of an interim signal at Alder Avenue and SR 116. This fair share contribution towards signalization is in addition to the payment of traffic impact fee that fund planned future improvements to Gravenstein Highway, construction of the new north-south street, and a new signal at Gravenstein Highway and the new north-south street. The City of Cotati and Caltrans will continue to monitor circulation activity along the SR 116 corridor and will utilize traffic impact fees and fair share contributions to implement interim (as warranted) and planned future improvements as the General Plan builds out. With payment of a traffic impact fee and a proportional fair share contribution for an interim signal at Alder Avenue and SR 116 (as warranted), the proposed project would contribute funds that enable to City to realize interim and planned future improvements along the SR 116 corridor. Therefore, the project would have less than significant impacts due to a conflict with a program, plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system.

Sonoma County Comprehensive Transportation Plan (CTP)

The Sonoma County Transportation Authority (SCTA) acts as the countywide planning and fund programming agency for transportation and performs a variety of important functions related to advocacy, project management, planning, finance, grant administration and research.¹⁹ The SCTA prepared and released Moving Forward 2040, Sonoma County's CTP, in September 2016.

The CTP greenhouse gas (GHG) reduction target has been updated to be consistent with Climate Action 2020 and Beyond (Sonoma County Regional Climate Action Plan) and statewide GHG reduction goals. The new CTP GHG target aims to reduce 2040 GHG emissions from transportation to 60 percent below 1990 levels by 2040. Reaching this target will require a combination of efforts to reduce overall travel, or reduce VMT, and making travel that does occur cleaner and more efficient. Implementing the projects, programs, strategies, and policies included in the CTP high performing scenario could reduce travel (VMT) by almost one-third (32 percent) in 2040 when compared to a future in which no efforts are made to reduce travel or address future travel impacts. In addition,

¹⁹ Sonoma County Transportation Authority, About SCTA, <http://scta.ca.gov/about-scta/>, Accessed October 17, 2018.

the Sonoma County vehicle fleet will need to change significantly in order for CTP and state GHG reduction goals to be met.

Of the major roadway projects identified in Moving Forward 2040 relative to Cotati, only one project is located in the vicinity of the Residential Care Facility for the Elderly: the widening and rehabilitation of SR 116. The proposed project would dedicate sufficient right-of-way for the future widening and rehabilitation of SR 116 to occur. As such, the proposed project would not preclude the construction of improvements identified in Moving Forward 2040.

In conclusion, implementation of the project would not exceed, either individually or cumulatively, a level of service standard established by the SCTA for designated roads or highways, nor would the project conflict with the goals in the Moving Forward 2040, Sonoma County's CTP. Therefore, impacts would be less than significant.

Transit, Bicycle and Pedestrian Facilities

According to the Cotati Bicycle and Pedestrian Master Plan, there are no existing bicycle or pedestrian facilities adjacent to the project site. An existing Class III Bike Lane is located along Gilman Ranch Road. A Class II Bike Lane is proposed along SR 116 and W. Cotati Avenue (near SR 116). A pedestrian crossing is proposed at the intersection of SR 116 and Alder Avenue.

As stated in Objective CI 2A of the General Plan, the City is striving to maintain and develop a network of sidewalks and pathways to provide for safe and convenient pedestrian travel. In particular, Policy CI 2.3 requires development projects to construct sidewalks and walkways on- and off-site in order to maintain consistency with the Cotati Bicycle and Pedestrian Master Plan, and as dictated by the location of transit stops and common pedestrian destinations.

A bus shelter, bus turnout, and connecting sidewalk are proposed off-site improvements east of Alder Avenue on SR 116 along the site frontage of the adjacent Cotati Village project.

The Residential Care Facility for the Elderly would provide a total of 16 parking spaces for bicycles. Pedestrian access will be accommodated throughout the site via dedicated pedestrian walkways and a sidewalk along the project site's frontage with SR 116 and Alder Avenue. The pedestrian walkways will allow for future sidewalk connections that would be constructed by the Cotati Village project site and other future projects under build out of the General Plan. There is no aspect of the project that would preclude the establishment of a future Class II Bike Lane along SR 116 or a future pedestrian crossing at the intersection of SR 116 and Alder Avenue. Therefore, impacts to transit, bicycle and pedestrian facilities will be less than significant.

5.17(b) (Conflict with CEQA Guidelines §15064.3(b)) Less Than Significant Impact: The City of Cotati has not yet adopted thresholds of significance for vehicle miles traveled. As an infill development, in close proximity to Highway 101 the proposed project is not expected to substantially increase vehicle miles travels (VMTs). The project will provide RCFE and Commercial uses in close proximity to existing goods and services and employment centers located in Cotati. In the absence of established VMT thresholds and given that the project is consistent with the City's growth and development anticipated by the General Plan, it is presumed that the project will have less than significant impacts due to VMTs.

5.17(c) (Design Feature Hazard) Less Than Significant Impact: Caltrans design standards indicate that for appropriate corner sight distance, "a substantially clear line of sight should be maintained between the driver of a vehicle waiting at the cross road and the driver of an approaching vehicle in the right lane of the main highway." The speed limit on Alder Avenue is 35 mph. However, vehicular speed at the entrance of the project site would generally be slower for the vehicles turning onto Alder Avenue from SR 116. For the vehicles traveling along Alder Avenue from Helman Lane, vehicular speed at the entrance of the project site is anticipated to be 35 mph. The primary entrance of the project site would be located approximately 200 feet north of SR 116, which would allow adequate sight distance.

The project proposes improvements along SR 116, which will assist in traffic flow and decrease hazardous conditions. The project also includes improvements along Alder Avenue. There are no design feature hazards that would be introduced by the project or proposed offsite frontage improvements. Therefore, impacts due to the project introducing a hazardous design feature would be considered less than significant.

Under cumulative conditions, consistent with the City's General Plan, the intersection of Alder Avenue and SR 116 would be eliminated, and a new north-south collector street is established. Upon elimination of the Alder Avenue connection to SR 116, Alder Avenue would be redesigned to terminate in a cul-de-sac. Adequate right-of-way dedication and planned improvements of the proposed project would accommodate the planned future improvements along project site frontages including SR 116, Alder Avenue and the new north-south collector. In the future, 10-year horizon, the intersection of SR 116 and Alder Avenue or the intersection of SR 116 and the new north-south collector street would need to be signalized in accordance with the General Plan. Therefore, in the long-term, impacts due to a design feature hazard would also be less than significant.

5.17(d) (Emergency Access) Less Than Significant Impact: The minimal increase of construction vehicles traveling to and from the project site on a temporary basis would not result in inadequate emergency access. In order to construct the project, road closure is not anticipated. A 24-foot wide EVA and parking area would extend along the northern edge of the property line. A fire truck turnaround would be provided at the northeast corner of the Memory Care Facility. The project's internal circulation plan has been reviewed and meets all requirements of the Cotati Public Works & Utilities and Fire Departments. Site circulation was determined to be adequate, including sufficient street widths to allow for fire truck turn around and sufficient access to the proposed buildings. Therefore, emergency vehicle access is adequate and potential impacts will be less than significant.

Mitigation Measures: None Required.

5.18. TRIBAL CULTURAL RESOURCES

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

Sources: City of Cotati General Plan; General Plan EIR; and Cultural Resources Study, prepared by Tom Origer & Associates, June 23, 2016.

Tribal Cultural Resources Setting:

According to Public Resources Code (PRC) Section 21074, a resource is a tribal cultural resource if it is either:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - a. Included or determined to be eligible for inclusion in the California Register of Historical Resources; or
 - b. Included in a local register of historical resources as defined in PRC Section 5020.1(k).
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). In applying the criteria set forth in PRC Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.
3. A cultural landscape that meets the criteria of PRC Section 21074(a) to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
4. A historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in PRC Section 21083.2(g), or a "non-unique archaeological resource" as defined in PRC Section 21083.2(h), if it conforms with the criteria of PRC Section 21074(a).

Tribal Cultural Resources Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.18(a.i – a.ii) (Listed or Eligible for Listing, Significant Resource) Less Than Significant Impact: Under existing conditions, the CG Zoning District currently allows for a variety of similar types of uses including commercial, retail, residential and lodging. Allowing RCFE uses, with a use permit, within the CG district would not adversely impact tribal cultural resources. As the proposed zoning text amendment is limited to allowing RCFE within the CG zoning district where other urban type development is already allowed, there would be no additional impacts to tribal cultural resources relative to existing conditions. Therefore, impacts related to tribal cultural resources would be less than significant from the proposed zoning text amendment.

Residential Care Facility for the Elderly & Commercial Building

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed for the area of potential project effect with negative results.²⁰

As stated in the Cultural Resources Study, on April 13, 2016, Tom Origer & Associates contacted the State of California's Native American Heritage Commission and representatives of the Federated Indians of Graton Rancheria, Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria of Pomo Indians, Lytton Band of Pomo Indians, and Stewarts Point Rancheria in writing (**Appendix F**). A letter dated April 20, 2016 from Reg Elgin, Dry Creek Rancheria was received by Tom Origer & Associates. Mr. Elgin stated that the Dry Creek Rancheria is not aware of any resources within the study area and requested notification if any remains are found. An email from Lorin Smith, Stewarts Point Rancheria, was received on April 25, 2016. Mr. Smith stated that the study area is out of the aboriginal territory of the Stewarts Point Rancheria Kashia Band of Pomo Indians. No other responses were received.

In accordance with PRC Section 21084.2, lead agencies are required to consider Tribal Cultural Resources (TCR) including a site feature, place, cultural landscape, sacred place or object, of cultural value to the tribe and is listed

²⁰ Souza, Sharaya, Native American Heritage Commission, letter to M-Group, August 18, 2017.

on the California Register of Historic Resources (CRHR) or a local register, or the Lead agency, at its discretion, chooses to treat resources as such. In accordance with PRC Section 21080.3.1(b)(1), the Federated Indians of Graton Rancheria, in a letter dated July 2015, stated that its tribe was traditionally and culturally affiliated with a geographic area within the City of Cotati's geographic area of jurisdiction, and requested formal notice of and information on projects for which the City of Cotati serves as a lead agency under CEQA.

In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the Federated Indians of Graton Rancheria (FIGR) on January 14, 2019, which included a brief description of the proposed project and its location, the City of Cotati's contact information, and a notification that the Federated Indians of Graton Rancheria has 30 days to request consultation. The City of Cotati received an email from the FIGR on February 13, 2019, stating that they would review the project within 10 business days. No further response was received from FIGR. The City of Cotati did not receive a response requesting consultation under PRC Section 21080.3.1(b)(2) from the Federated Indians of Graton Rancheria.

5.18(a.i) (Listed or Eligible for Listing) No Impact: As stated above, a search of the Sacred Lands file was conducted and did not indicate the presence of a Native American Sacred Site within or in the immediate vicinity of the project site. Therefore, the project would have no impact on a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

5.18(a.ii) (Significant Resource) Less Than Significant Impact with Mitigation: The City of Cotati has not identified any tribal cultural resources and there are no known concerns associated with the proposed project impacting tribal cultural resources. The City of Cotati did not receive a response requesting consultation under PRC Section 21080.3.1(b)(2) from the Federated Indians of Graton Rancheria.

Although no Tribal Cultural resources were encountered during the cultural resources field survey conducted onsite, there remains to be a potential that tribal cultural resources may be identified during site development. As such, development within the project site has the potential to result in impacts to Tribal Cultural resources. Mitigation set forth under the Cultural Resources discussion above, provides protection of cultural resources, including Tribal Cultural Resources, in the event of accidental discovery. Therefore, the proposed project would have less than significant impacts on Tribal Cultural Resources.

Mitigation Measures: Cul-1 and Cul-2 above.

5.19. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?

☐☐☒☐

Sources: City of Cotati 2013 General Plan; General Plan EIR; Sonoma County Water Agency 2015 Urban Water Management Plan, prepared by Brown and Caldwell, June 2016; Santa Rosa Sanitary Sewer System Master Plan Update, prepared by Arcadis, October 2014; Cotati 2010 Urban Water Management Plan, prepared by Carollo Engineers, August 2011; and City of Santa Rosa Incremental Recycled Water Program, August 2007 Update to the Recycled Water Master Plan, prepared by Winzler & Kelly, July 2007.

Utilities and Service Systems Setting:

The City of Cotati collects impact and/or service fees for wastewater storm drain and other utilities and service systems. The one-time impact fees are charged to offset the cost of improving or expanding city facilities in order to accommodate new private development. The fees are utilized to fund the construction or expansion related to capital improvements necessitated by cumulative growth citywide.

The project site is located within the City limits and is currently well served by existing utilities and service systems. New service connections will be installed that tie into existing facilities located within Alder Avenue and SR 116. The connection of new services is not expected to require substantial infrastructure improvements or to adequately serve the proposed project.

Water Supplies

The Cotati Department of Public Works and Engineering, Water Division, serves as the potable water purveyor for the City of Cotati. The City of Cotati sources approximately 67 percent²¹ of its water supply from the Sonoma County Water Agency (SCWA) that is conveyed from the Russian River to the City via the 48-inch Cotati Intertie Aqueduct located in East Cotati Avenue. Within the City, the SCWA maintains three above-ground storage tanks with a total capacity of 36 million gallons. The balance of the City's water supply is served by three municipal groundwater wells owned and operated by the City. The groundwater wells also serve as the contingency supply to supplement water needs during peak periods and periods of drought.

The SCWA adopted its 2015 UWMP in June 2016. Currently, four water rights permits issued by the SWRCB authorize the SCWA to store up to 122,500 afy of water in Lake Mendocino and up to 245,000 afy of water in Lake Sonoma, and to divert up to 180 cubic feet per second (cfs) of water from the Russian River with a limit of 75,000 afy.²² The permits also establish minimum instream flow requirements for fish and wildlife protection and recreation. Based on the water demand projections described in 2015 UWMP, SCWA estimates that its total annual diversions and re-diversions of Russian River water may exceed the 75,000 afy limit by about 117 afy in 2035 and by about 988 afy in 2040. If the trends in these projections continue, then it may be necessary for SCWA to make the necessary filings with the SWRCB in approximately 2030, so that SCWA will be authorized to divert and re-divert more than 75,000 afy in 2035.

²¹ City of Cotati 2017 Water Quality Report, http://www.cotaticity.org/UserFiles/Servers/Server_9669113/File/2017%20Water%20Quality%20Report.pdf, Accessed October 17, 2018.

²² Sonoma County Water Agency 2015 Urban Water Management Plan, prepared by Brown and Caldwell, June 2016.

The SCWA also maintains three groundwater wells in the Santa Rosa Plain Groundwater Sub-basin, with a total capacity of approximately 2,300 acre-feet per year (afy), which is used on an as-needed basis during periods of drought or when Russian River supplies are otherwise constrained. Annual production from the three wells has ranged from 172 to 1,271 afy between 2011 to 2015, with an average of 643 afy.²³

According to the SCWA 2015 UWMP, the water agency provided 43,145 af in 2015 to its contractors and customers. The SCWA supplied 479 af to the City of Cotati, which represented approximately 1.1 percent of the total water supplied by SCWA in 2015. The SCWA projects to supply approximately 73,045 af to its contractors and customers in 2035. The City of Cotati is projected to receive 960 af, which represents approximately 1.3 percent of the total water to be supplied by SCWA in 2035.

Under the existing water supply agreement with SCWA, the City of Cotati has a maximum entitlement of 1,520 afy; this agreement remains in effect until January 30, 2040. The balance of the City's water supply is served by three municipal groundwater wells owned and operated by the City. The groundwater wells also serve as the contingency supply to supplement water needs during peak periods and periods of drought.

The California Water Code requires that urban water suppliers servicing 3,000 or more connections, or supplying more than 3,000 af of water annually, prepare an Urban Water Management Plan (UWMP) in accordance with the Urban Water Management Planning Act. The City of Cotati supplied 803 af of potable water to approximately 2,573 customers in 2010, and therefore was not legally required to develop an UWMP. However, the City did prepare an UWMP with the intention of taking a proactive approach to water supply planning and to promote the efficient use of water.

Wastewater Treatment

The City of Cotati owns and operates a wastewater collection system that services approximately 1,200 acres. The Sanitary Sewer system is composed of four lift stations, 140,300 linear feet of collection piping that ranges in size from six to twenty-four inches, 484 manholes, 150 cleanouts and a 24-inch transfer interceptor which conveys wastewater to the Laguna Wastewater Treatment Plant (WTP) in Santa Rosa.

The Laguna WTP treats all wastewater generated by residential, commercial and industrial uses within the City of Santa Rosa, Rohnert Park, Cotati, Sebastopol and the South Park Sanitation District. The water recycling facility produces tertiary recycled water in compliance with the California Department of Health Services. At present, treatment capacity is at approximately 24 mgd.²⁴ An Incremental Recycled Water Program (IRWP) has been approved and will be implemented as growth occurs. The City of Santa Rosa IRWP, August 2007 Update to the Recycled Water Master Plan, estimates that in 2020, total average dry weather flow (ADWF) to the Laguna WTP will be approximately 25.89 mgd.²⁵

As of 2014, the Laguna WTP receives approximately 15 mgd from the City of Santa Rosa, 3.3 mgd from the City of Rohnert Park, 0.7 mgd from the City of Sebastopol, and 0.5 mgd from the City of Cotati, for a total of approximately 19.5 mgd.²⁶ Wastewater generated by the City of Cotati is conveyed directly to the Laguna WTP via the City's Hellman Lane 24-inch trunk line. The wastewater generated by the City of Cotati represents less than 3 percent of the total wastewater treated at the Laguna WTP. Treated water from the Laguna WTP is either discharged into the Russian River via the Laguna de Santa Rosa or recycled for one or more of the following: agricultural irrigation, supply water for wetlands, urban irrigation or for Geyser recharge.

²³ Ibid.

²⁴ Santa Rosa Sanitary Sewer System Master Plan Update, prepared by Arcadis, October 2014.

²⁵ City of Santa Rosa Incremental Recycled Water Program, August 2007 Update to the Recycled Water Master Plan, prepared by Winzler & Kelly, July 2007.

²⁶ Santa Rosa Sanitary Sewer System Master Plan Update, prepared by Arcadis, October 2014.

Storm Drains

Within the City of Cotati storm drains convey runoff from impervious surfaces such as streets, sidewalks and buildings to gutters that primarily drain to Copeland Creek, Cotati Creek and/or Washoe Creek and ultimately to the Russian River. The stormwater runoff is untreated and carries with it any contaminants picked up along the way such as solvents, oils, fuels and sediments. In accordance with NPDES permitting requirements, the City has developed a Storm Water Management Plan (SWMP) which establishes standard requirements and controls related to the City's storm drain system. All existing and proposed development must adhere to the city's SWMP.

Solid Waste

Solid Waste management in Cotati is overseen by the Sonoma County Waste Management Agency, a Joint powers authority for the nine cities and County of Sonoma. The City contracts with Recology for solid waste disposal and recycling services. This company provides canisters for garbage, green (plant waste) materials, and recycling. Solid waste is collected and transferred to the Sonoma County landfill sites.

Utilities and Service Systems Impact Discussion:***Zoning Amendment to Allow RCFE within CG Zoning District*****5.19(a-e) (Exceed Water, Wastewater Treatment, Storm Water and/or Solid Waste Disposal Requirements)**

Less Than Significant Impact: Allowing RCFE uses, with a use permit, within the CG district would not adversely impact utilities or service systems. As with all development applications received by the City, and through the Use Permit process for RCFE uses, the City of Cotati assesses capacity and infrastructure needs to serve proposed development and are subject to General Plan policies including those that require water, wastewater and solid waste management practices. As the proposed zoning text amendment is limited to allowing RCFE within the CG zoning district where other urban type development is already allowed, there would be no additional impacts to utilities and service systems relative to existing conditions. Therefore, impacts related to utilities would be less than significant from the proposed zoning text amendment.

Residential Care Facility for the Elderly & Commercial Building

5.19(a) (Relocation/Expansion of Utilities) Less Than Significant Impact: The project site is well served by existing utilities located underground along the project site frontage to SR 116 and Alder Avenue. The project will not require or result in the relocation or expansion of offsite utilities. Existing water, wastewater, electric power, natural gas, and telecommunications facilities extend to the project site and have sufficient capacity to serve the proposed development. The project will not result in significant environmental impacts due to the expansion of storm water drainage facilities or construction of new facilities as improvements are limited to activities onsite and along the site frontage. Development of the proposed project will increase the amount of impervious surfaces relative to existing conditions. In order to offset the increase in stormwater runoff flows, storm drains would be utilized throughout the project site to direct stormwater from impervious areas to landscaped courtyards, rain garden with a detention basin, and other vegetated bio-retention features consistent with the requirements of Low Impact Development (LID). Stormwater runoff would then either discharge to the existing swale along the western edge of the property or to the existing storm drain network along Alder Avenue. Therefore, the project is expected to result in less than significant impacts due to the relocation or expansion of utilities including stormwater infrastructure.

5.19(b) (Sufficient Water Supplies) Less Than Significant Impact: The project will utilize water obtained from the City's municipal water system to meet onsite potable water demands. The water demand resulting from the proposed project will increase relative to existing uses.

The 2013 General Plan EIR estimates total water demand at buildout (2035) to be 1,552 afy within the City limits and 1,757 afy within the Planning Area. As described in the General Plan EIR, the projected water supply available to the City of Cotati in 2035 is 2,076 afy and consists of water from SCWA (1,246 afy), groundwater (530 afy),

recycled water (32 afy) and future water conservation (268 afy). As such, the water supply available to the City exceeds the projected water demand associated with full buildout of the General Plan, including the proposed project.

The project is required to adhere to the Water Conservation Ordinance, Chapter 13.30.060 and will install ultra-low water use plumbing fixtures and appliances and water efficient landscaping that features drought tolerant plant varieties. The inclusion of a water efficient plant pallet in the landscaping design will ensure that water demands are minimized for landscaping purposes. Applicable City water fees will be collected from the applicant in order to fund the applicant's share for use of existing facilities and planned improvements. Therefore, there are sufficient water supplies to serve the project and impacts would be less than significant.

5.19(c) (Sufficient Wastewater Treatment Capacity) Less Than Significant Impact: Wastewater generated by the project is consistent with the service needs anticipated by the Cotati 2013 General Plan and will not require the expansion of treatment facilities or the construction of new facilities. Wastewater flows from the proposed project will be conveyed to the Laguna WTP, which has sufficient operating capacity to handle the additional flows generated by the proposed project. The project is not expected to exceed wastewater treatment requirements set forth by the Regional Water Quality Control Board, nor necessitate the expansion or construction of wastewater treatment facilities. The project does not propose any industrial uses that would generate wastewater requiring special treatment nor would effluent contain constituents exceeding applicable standards. City Wastewater capacity fees will be collected from the applicant in order to fund the applicant's share for use of existing facilities and planned improvements. Therefore, the project would not exceed wastewater treatment requirements and impacts would be less than significant.

As stated in the 2013 General Plan EIR, Cotati's capacity allocation under the 2002 Fourth Amendment to the Subregional Partnership with the City of Santa Rosa was 0.76 mgd. In order to meet projected flows under cumulative General Plan buildout conditions, the City's allocation needs to be increased to at least 0.83 mgd.

The City of Santa Rosa IRWP, August 2007 Update to the Recycled Water Master Plan, estimates that in 2020, total ADWF to the Laguna WTP will be approximately 25.89 mgd, which exceeds the current NPDES permit capacity of the plant. While the City of Cotati is projected to contribute approximately 3.2% of the wastewater treated at the Laguna WTP, under 2035 buildout conditions, the existing permitted capacity of the Plant would be exceeded.

Implementation of the policies and actions identified in the General Plan would assist in ensuring that adequate treatment plant capacity and permitted capacity is available to meet 2035 buildout conditions, including wastewater demands generated by the City of Cotati and the rest of the Regional Partners. However, as stated in the General Plan EIR, an increase in permitted capacity cannot be guaranteed and the impact was considered cumulatively considerable and significant and unavoidable.

2013 Cotati General Plan Policy CSF 2.16, and Actions 2l and 2m (identified below) would reduce this impact to the greatest degree feasible, but not to a less than significant or less than cumulatively considerable level. As a result, the City of Cotati adopted a statement of overriding considerations regarding the potential to exceed wastewater treatment capacity or the requirements of the RWQCB.

Policy CSF 2.16: Work with the Santa Rosa Subregional Wastewater System and neighboring cities to assist in the maintenance of an adequate sewage treatment and disposal system for the region.

Action CSF 2l: Continue to monitor wastewater flow generation rates within the City's service area and apply to the subregional partners for an incremental increase in wastewater flow allocation to meet projected demand prior to any exceedance of the City's wastewater flow allocation under the Subregional Partnership.

Action CSF 2m: Coordinate with the Laguna Wastewater Treatment Plant to increase the National Pollutant Discharge Elimination System (NPDES) permit capacity of the plant to meet projected 2035 demand for all sources of wastewater treated at the plant.

The proposed project would generate wastewater flows that would contribute to the cumulative impacts to wastewater treatment under buildout conditions. As previously stated, the City has adopted a statement of overriding conditions for the potential to exceed wastewater treatment capacity or the requirements of the RWQCB. Applicable Wastewater Capacity fees will be collected from the applicant in order to fund the applicant's share for use of existing facilities and planned improvements. Further, the project will implement all CalGreen Tier 1 building requirements which include indoor water efficiency standard, thereby ensuring that wastewater volumes are minimized. Therefore, the project will have less than significant impacts related to the adequacy or capacity of wastewater treatment facilities.

5.19 (d, e) (Solid Waste Generation/Compliance with Solid Waste Management) Less Than Significant Impact: During construction, the project would generate solid waste from concrete and asphalt from the removal of existing improvements and vegetation waste from tree removal. Consistent with the Cal Green Tier 1 Mandatory Measures, the applicant will be required to recycle or salvage at least 65 percent of nonhazardous construction and demolition waste and prepare a Construction Waste Management Plan that documents the diversion of materials as required by CalGreen.²⁷ Accordingly, impacts associated with construction waste will be less than significant.

At operation, the project would continue to generate additional solid waste. Although the waste stream generated by the project is expected to increase during construction and operation, it is not expected to exceed landfill capacity and is not expected to result in violations of federal, state, or local statutes and regulations related to solid waste. Therefore, implementation of the project will result in less than significant impacts to the local landfill's permitted capacity for solid waste disposal, as well as federal, state, and local statutes and regulations.

Mitigation Measures: None Required.

5.20. WILDFIRE

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

²⁷ California Green Building Standards Code (2016), Effective January 2, 2017.

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?

☐☐☒☐

Sources:

Wildfire Setting:

The City of Cotati is susceptible to wildland fires due to moderate fuel loads within the Sphere of Influence and on undeveloped parcels within the UGB that contain grasslands. Global climatic conditions such as increased heat, prolonged periods of drought and extreme weather also contribute to wildfire risks. The areas most susceptible to fire hazards are located west and east of City limits; these areas are designated as "Moderate and High Fire Hazard Severity Zone" within a Local Responsible Area by CAL FIRE (see **Figure B-7** in **Appendix B**).

In October 2017, the Tubbs Fire (Central LNU Complex) burned approximately 36,807 acres in the northern and eastern portions of the City of Santa Rosa. Residents were exposed to direct effects of the wildfire, such as the loss of a structure, and to the secondary effects of the wildfire, such as smoke and air pollution. Smoke generated by wildfire consists of visible and invisible emissions that contain particulate matter (soot, tar, water vapor, and minerals) and gases (carbon monoxide, carbon dioxide, nitrogen oxides). Public health impacts associated with wildfire include difficulty in breathing, odor, and reduction in visibility.

The project site is located within the City's UGB and surrounded by roadways and developed and undeveloped lands.

Wildfire Impact Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.20 (a-d) (Impair Emergency Plan, Expose Occupants to Wildfire Pollutants, Require Infrastructure, Pose Wildfire Related Risks) No Impact: The proposed zoning text amendment would allow for future development applications to be received for Residential Care Facilities for the Elderly within the CG Zoning District. Under existing conditions, the CG Zoning District currently allows for a variety of similar types of uses including commercial, retail, residential and lodging. Allowing RCFE uses, with a use permit, within the CG district is consistent with the General Plan and would not introduce any conflicts with emergency plans no pose wildfire related risks as the CG zoning district is not located within or near high fire hazard zones. Therefore, there would be no impacts from the proposed zoning text amendment.

Residential Care Facility for the Elderly & Commercial Building

5.20(a) (Impair Emergency Plans) Less Than Significant Impact: The project site is categorized as a Non-VHFHZ by CAL FIRE. Therefore, the proposed project is not expected to substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

5.20(b-d) (Wildfire Risk Exacerbation, Infrastructure Contributing to Wildfire Risk, Exposure to Wildfire-Related Risks) Less Than Significant Impact: The project site is relatively flat and surrounded by lands that are undeveloped and previously disturbed. New structures introduced onsite would be built according to the latest California Building Code, which require fire resistant standards for building materials, systems, and assemblies used in the exterior design and construction of new buildings. There are no factors, such as steep slopes,

prevailing winds, or the installation/maintenance of new infrastructure, that would exacerbate fire risk or expose project occupants to the uncontrolled spread of a wildfire, pollutant concentrations from a wildfire, post-fire slope instability, or post-fire flooding. Therefore, impacts would be less than significant.

Mitigation Measures: None Required.

5.21. MANDATORY FINDINGS OF SIGNIFICANCE CAL. PUB. RES. CODE §15065)

A focused or full environmental impact report for a project may be required where the project has a significant effect on the environment in any of the following conditions:

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Mandatory Findings Discussion:

Zoning Amendment to Allow RCFE within CG Zoning District

5.16(a-c) (Degrade the Environment, Cumulatively Affect, Substantial Adverse Effect on Humans) Less Than Significant Impact: The proposed zoning text amendment to allow RCFE within the CG zoning district would not result in degradation to the quality of the environment, cumulative impacts nor substantial adverse effect on human beings. Future development proposals within the CG zoning district, including RCFE facilities, would be subject to General Plan policies including those that ensure protection of nature resources, human health and safety. Pursuant to the City's General Plan and zoning, similar types of uses such as residential, commercial, retail and lodging are currently allowed uses within the CG zoning district and introducing the new RCFE use type will not result in any new or more severe environmental impacts. Therefore, impacts from the proposed zoning text amendment to allow RCFE within the CG zoning district would be less than significant.

Residential Care Facility for the Elderly & Commercial Building

5.20(a) (Degrade the Environment): Less Than Significant Impact: The project is located within the City limits and consistent with the General Plan Land Use designation for the site, including its goals, objectives, policies and actions of the City of Cotati. With implementation of mitigation measures set forth above under Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, and Noise, the project's potential impacts would be reduced to levels below significance. As such, the project will not degrade the quality of the environment, reduce habitat, or adversely affect cultural resources. Therefore, the project will have less than significant impacts due to degradation of the environment.

5.20(b) (Cumulatively Affect the Environment) Less Than Significant Impact with Mitigation: The CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or increase in environmental impacts. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the proposed project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (Guidelines, Section 15355(a)(b)).

The analysis of cumulative impacts for each environmental factor can employ one of two methods to establish the effects of other past, current, and probable future projects. A lead agency may select a list of projects, including those outside the control of the agency, or, alternatively, a summary of projections. These projections may be from an adopted general plan or related planning document, or from a prior environmental document that has been adopted or certified, and these documents may describe or evaluate the regional or area-wide conditions contributing to the cumulative impact.

This Initial Study evaluates cumulative impacts relative to buildout conditions anticipated by the City of Cotati's General Plan and as analyzed in the General Plan EIR. The project has the potential to incrementally contribute in the following cumulative impacts identified and analyzed in the General Plan EIR:

Traffic (General Plan EIR Impacts 3.12-1, 3.12-2, 3.12-3, 4.13): The project would contribute vehicle trips to the study intersection, roadway segments, and local and regional arterials including SR 116 and Highway 101. However, as described in the analysis above, operation of the unsignalized study intersection (SR 116/Alder Avenue) is projected to deteriorate significantly with the increase in traffic projected over the next ten years, with or without the proposed project. Under Cumulative Conditions and assuming that the planned new north-south street has not yet been constructed, signalization of Gravenstein Highway/Alder Avenue will be necessary in order for the intersection to operate acceptably, with or without the proposed project. As such, the project is subject to a traffic impact fees for the installation of planned future improvements to SR 116 including future construction of the new north-south street and as condition of approval shall contribute a proportional fair share towards a new signalized intersection on SR 116 at Alder Avenue. Should the planned future signalization of the new north-south street at SR 116 occur as identified in the General Plan, then signalization of Alder Avenue would not be warranted.

The proportional fair share contribution is in addition to the required payment of traffic impact fee, which fund planned future improvements citywide including along SR 116 and the planned future signalization at the new north-south street, construction of north-south street, and reconfiguration of Alder Avenue into a cul-de-sac (assuming north-south street is constructed). Additionally, the project includes dedication of frontage along the property boundary to realize ultimate right-of-way improvements identified in the General Plan. The project would contribute funding and right-of-way dedication to assist the City of Cotati in implementing planned future roadway improvements required under buildout of the General Plan. Therefore, the project's contribution to cumulatively considerable traffic impacts would be less than significant.

Noise (General Plan EIR Impacts 3.10-1, 3.10-7, and 4.11): The project will increase vehicle trips on local roadways and, in doing so, incrementally contribute to noise levels determined by the General Plan to be significant at build-out. However, its incremental contribution of vehicular trips is insufficient to result in a perceptible change in noise level. Therefore, the project's contribution to this potentially significant cumulative impact would not be considerable.

Utilities (General Plan EIR Impacts 3.13-3 and 4.14): The project will result in an increased wastewater flows that would contribute to the cumulative potential to exceed wastewater treatment capacity or the requirements of the RWQCB. However, as stated in the analysis above, applicable wastewater capacity fees will be collected from the applicant to fund the applicant's share for use of existing facilities and planned improvements. Public utility and service providers will be capable of serving the project with existing or planned facilities. Therefore, the project's contribution to this potentially significant cumulative impact would not be considerable.

The project is adjacent to the proposed Cotati Village Project, located on the east side of Alder Avenue directly across from the subject project site. Depending on approvals and processing timeline, there is a potential that construction activities may overlap or occur simultaneously. In order to ensure that cumulative impacts from one or more construction activities occurring simultaneously are reduced to levels below significance the project shall implement **Mitigation Measure CUM-1**, which requires coordination of construction schedule and road closure to minimize potential noise, air quality and circulation impacts.

The project implements City's General Plan by introducing a RCFE and commercial business within City limits on a site that has been identified for urban type uses. The project is located in close proximity to Highway 101 and near local goods and services. Potential cumulative environmental impacts are expected to remain at, or be mitigated to, levels below significance, and long-term environmental goals are not expected to be adversely impacted by the project. The Project does not increase the severity of any of the impacts from the levels identified and analyzed in the General Plan, and development of the project site is proposed at densities consistent with those set forth in the General Plan EIR. Therefore, the project's cumulative impacts will be reduced to less than significant levels.

5.20(c) (Substantial Adverse Effect on Humans) Less Than Significant Impact: As reflected in the analysis above for each environmental topic, the project does not have the potential to result in substantial adverse impacts to humans. With mitigation measures set forth above, environmental effect that would directly or indirectly impact human beings onsite or in the project vicinity will be reduced to less than significant levels. Therefore, the project will have less than significant impacts due to substantial adverse environmental effects.

Mitigation Measures:

CUM-1 The applicant shall coordinate the project's construction activities and construction schedule with the City to minimize the concurrent construction of projects in the vicinity of the subject property and ensure that overlapping road closures, periods of increased noise and dust generation are minimized.

6. REFERENCE DOCUMENTS

The following information sources were referenced in the preparation of this Initial Study/Mitigated Negative Declaration and are available for review online or at the City of Cotati Planning counter during normal business hours. Questions or requests to review any of the technical appendices listed below may be directed to the project planner, Jon-Paul Harries, at jpharries@cotaticity.org.

6.1. TECHNICAL APPENDICES

- A. Relevant Plans: (Project Plans dated December 5, 2018; Preliminary Site Improvement Plans dated December 3, 2018; Landscape Plans dated December 3, 2018; Cotati Village Offsite Improvements Left Turn Lane & Bus Turnout, January 9, 2019).
- B. *Tree Preservation and Mitigation Report Reds Corner, Cotati, California*, prepared by Horticultural Associates, May 17, 2016.
- C. Figures C-1 through C-9, prepared by M-Group, February 2019:
 - C-1 Important Farmland Map
 - C-2 Forest Land
 - C-3 Faults
 - C-4 Alquist-Priolo Zones
 - C-5 Shaking Hazard
 - C-6 Liquefaction Susceptibility
 - C-7 Landslide Potential
 - C-8 Fire Hazard Severity Zones
 - C-9 FEMA Flood Hazard
- D. *Evaluation of Air Quality and Greenhouse Gas Emissions, Townsend Assisted Living and Memory Care Facility, Cotati, California*, prepared by Illingworth & Rodkin, January 9, 2018.
- E. *Biological Resource Analysis, Sterling Senior Communities, City of Cotati, California*, prepared by Monk & Associates, November 26, 2018.
- F. *Cultural Resources Study for the Proposed Residential Care Facility at 8145 Highway 116 and 7515 Alder Avenue, Cotati, California*, prepared by Tom Origer & Associates, June 23, 2016.
- G. *Geotechnical Feasibility Evaluation, Reds Site Northwest Corner of Alder Avenue and Highway 116, Cotati, California*, prepared by Miller Pacific Engineering Group, April 15, 2016.
- H. *Initial Storm Water Low Impact Development Submittal for Sterling Senior Communities, 8145 Highway 116, Cotati, California*, prepared by Adobe Associates, Inc., December 3, 2018.
- I. *Qualitative Evaluation of Noise Issues, Townsend Capital Partners LLC, Cotati, California*, prepared by Illingworth & Rodkin, May 4, 2016.
- J. *Focused Traffic Impact Analysis for the Cotati ALF Project*, prepared by W-Trans, April 19, 2019.

6.2. OTHER DOCUMENTS REFERENCED

1. *2015 Traffic Volumes on California State Highways*, http://www.dot.ca.gov/trafficops/census/docs/2015_aadt_volumes.pdf, accessed September 28, 2017.
2. *BAAQMD 2017 Bay Area Clean Air Plan*, prepared by the Bay Area Air Quality Management District, April 2017.
3. *BAAQMD Roadway Screening Analysis Calculator*, <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>, accessed September 28, 2017.
4. *California Environmental Quality Act Air Quality Guidelines*, prepared by the Bay Area Air Quality Management District, May 2011.
5. *California Department of Conservation Farmland Mapping and Monitoring Program*.
6. *California Department of Conservation, Sonoma County Tsunami Inundation USGS 24K Quads*, http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/Sonoma, Accessed August 18, 2017.
7. *California Regional Conservation Plans Map*, prepared by CDFW, July 2017. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed August 4, 2017.
8. *California Scenic Highway Mapping System*, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, Accessed September 15, 2019.
9. *City of Cotati 2010 Urban Water Management Plan*, prepared by Carollo Engineers, August 2011.
10. *Public Draft Environmental Impact Report for the 2013 Cotati General Plan Update* (SCH #2013082037), September 2014.
11. *Findings of Fact and Statement of Overriding Considerations for the 2013 Cotati General Plan Update*, November 2014.
12. *City of Cotati General Plan*, prepared March 23, 2015.
13. *City of Cotati Housing Element*, adopted May 19, 2015.
14. *City of Cotati Bicycle and Pedestrian Master Plan*, prepared by Sonoma County Transportation Authority, adopted December 2008, updated April 22, 2014.
15. *City of Santa Rosa Incremental Recycled Water Program, August 2007 Update to the Recycled Water Master Plan*, prepared by Winzler & Kelly, July 2007.
16. *Climate Action 2020 and Beyond*, prepared by Sonoma County Regional Climate Action Plan, July 2016.
17. *Cotati-Rohnert Park Unified School District*, Monthly Enrollment as of August 31, 2017, presented to Board of Trustees on September 15, 2017.
18. *Department of Water Resources, Division of Safety of Dams*, <http://www.water.ca.gov/damsafety/aboutdamsafety/index.cfm>, accessed August 8, 2017.
19. *Department of Water Resources, Division of Safety of Dams, Listing of Dams*, <http://www.water.ca.gov/damsafety/docs/County2017.pdf>, accessed August 8, 2017.
20. *Developer Fee Justification Study for Cotati-Rohnert Park Unified School District*, prepared by SchoolWorks, Inc., <https://www.crpUSD.org/developerfees>, March 2016.
21. *Moving Forward 2040 Sonoma County's Comprehensive Transportation Plan*, prepared by Sonoma County Transportation Authority, September 2016.

22. *Rancho Adobe Fire Protection District*, http://rancho-adobe-fire.org/about_us.aspx, accessed October 2, 2017.
23. *Recovery Plan for the Santa Rosa Plain*, prepared by U.S. Fish and Wildlife Service, May 2016.
24. *Santa Rosa Plain Conservation Strategy*, prepared by U.S. Fish and Wildlife Service, December 2005.
25. *Santa Rosa Sanitary Sewer System Master Plan Update*, prepared by Arcadis, October 2014.
26. *Sonoma County Transportation Authority*, About SCTA, <http://scta.ca.gov/about-scta/>, accessed August 16, 2017.
27. *Sonoma County Water Agency 2015 Urban Water Management Plan*, prepared by Brown and Caldwell, June 2016.
28. *Souza, Sharaya*, Native American Heritage Commission, letter to M-Group, August 18, 2017.
29. *State Water Resources Control Board, Construction General Permit Order 2009-0009-DWQ*, http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml, Accessed August 8, 2017.
30. *Sterling Senior Communities - Preliminary Analysis of the Economic Impacts for Sonoma County and the City of Cotati*, prepared by Marin Economic Consulting, August 11, 2016.
31. *U.S. Geological Survey*, Susceptibility Map of the San Francisco Bay Area, <https://geomaps.wr.usgs.gov/sfgeo/liquefaction/susceptibility.html>, Accessed August 17, 2017.
32. *University of California Museum of Paleontology*, Miocene Mammal Mapping Project (MioMap), <http://www.ucmp.berkeley.edu/miomap/>, accessed August 10, 2017.
33. *Vincent, Gerald*, U.S. Army Corps of Engineers, Letter to Carolyn Tatoian-Cain, DTSC, dated May 25, 2014.

7. MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Monitoring and Reporting Program

Residential Care Facility for the Elderly & Commercial Building

State Route 116 and Alder Avenue

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p><u>AIR QUALITY</u></p> <p>AQ-1: Latest BAAQMD recommended Best Management Practices (BMPs) to control for fugitive dust and exhaust during all construction activities shall be incorporated into all demolition and construction plans to require implementation of the following:</p> <ol style="list-style-type: none"> 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times per day using recycled water. 2. All haul trucks transporting soil, sand, or other loose material shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided 	Project Applicant	<p>Cotati Community Development Department</p> <p>Cotati City Engineer</p>	<p>Prior to issuance of grading permit</p> <p>Ongoing throughout project construction</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>for construction workers at all access points.</p> <p>7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper working condition prior to operation.</p> <p>8. Construction equipment staging shall occur as far as possible from existing sensitive receptors (away from the northeast property line and surrounding residences).</p> <p>9. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.</p> <p>AQ-2: To reduce potential impacts to air quality during construction, the project shall develop and implement a plan demonstrating that off-road equipment used on-site to construct the project would achieve a fleet-wide average 80 percent reduction, or more, in particulate matter exhaust emissions. Examples of how to achieve this reduction include the following:</p> <ol style="list-style-type: none"> 1. Diesel-powered off-road equipment larger than 50 horsepower operating on-site for more than two days shall meet, at a minimum, U.S. EPA particulate matter emissions standards for Tier 4 engines or equivalent. 2. Require the use of construction equipment that is alternatively-fueled (i.e., non-diesel). 3. Require the use of equipment that meets U.S. EPA particulate matter emissions standards for Tier 2 or 3 	Project Applicant	<p>Cotati Community Development Department</p> <p>Cotati City Engineer</p>	<p>Prior to issuance of grading permit</p> <p>Ongoing throughout project construction</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>engines (or equivalent) and includes CARB-certified Level 3 Diesel Particulate Filters.</p> <ol style="list-style-type: none"> 4. The simultaneous occurrence of excavation, grading, and ground-disturbing construction 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. 5. Minimize the idling time of diesel-powered construction equipment to two minutes. 6. All construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. 7. Require all contractors use equipment that meets CARB's most recent certification standard for off-road heavy-duty diesel engines. 				
<p><u>BIOLOGICAL RESOURCES</u></p> <p>BIO-1: In the event that the special-status survey identifies presence of rare plants, then areas onsite where special status species are present shall be avoided through site design modifications that preclude development into sensitive habitat areas. In the event that avoidance cannot be achieved then a mitigation plan shall be developed in consultation with USFWS and CDFW. If the plant is state listed (CESA) then an incidental take permits (ITP, 2081 agreement) shall be acquired from the CDFW prior to any grading activity. All provisions of the ITP shall be verified by the City of Cotati prior to the issuance of grading permits. Alternatively, at the discretion of CDFW for state listed species, compensatory credits at an approved mitigation bank or the preservation of offsite habitat may be determined to be an acceptable means of mitigation. Proof of the purchase of mitigation credits shall be provided to the City of Cotati prior to issuance of grading permits.</p>	<p>Project Applicant Project Biologist</p>	<p>Cotati Community Development Department USFWS CDFW</p>	<p>Prior to issuance of grading permit Ongoing through construction</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>BIO-2: In the event that the special-status survey identifies presence of a CNPS Rank 1B or 2 plant species and removal cannot be avoided, then a qualified botanist shall collect the seeds, propagules, and top soils, or other part of the plant that would ensure successful replanting of the population elsewhere. The seeds, propagules, or other plantable portion of all plants shall be collected at the appropriate time of the year. Half of the seeds and top soils collected shall be appropriately stored in long-term storage at a botanic garden or museum (for example, Luther Burbank Home & Gardens).</p> <p>The other half of the seeds, propagules, or other plantable portion of all plants shall be planted at the appropriate time of year (late-fall months) at an off-site protected property. The applicant shall retain a qualified biologist to conduct annual monitoring surveys of the transplanted plant population for a five-year period and shall prepare annual monitoring reports reporting the success or failure of the transplanting effort. These reports shall be submitted to the City of Cotati and appropriate resource agency (CDFW and/or USFWS) no later than December 1st each monitoring year. Alternatively, at the discretion of the City of Cotati for CNPS species, compensatory credits at an approved mitigation bank or the preservation of offsite habitat may be determined to be an acceptable means of mitigation. Proof of the purchase of mitigation credits shall be provided to the City of Cotati prior to issuance of site grading permits.</p>	<p>Project Applicant Project Biologist</p>	<p>Cotati Community Development Department</p> <p>Project Biologist USFWS CDFW</p>	<p>Prior to construction activities</p>	
<p>BIO-3: Since the project requires a Corps permit, even with the two plus years of negative rare plant surveys, a 1.5:1 replacement to impacts vernal pool listed plant habitat ratio must be met by the project provided: 1)</p>	<p>Project Applicant Project Biologist</p>	<p>Cotati Community Development Department</p>	<p>Prior to construction activities</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>the Programmatic Biological Opinion (2007) remains valid when the project is constructed; 2) a Corps permit is required for the project; and 3) the Corps/USFWS allows use of the 2007 Programmatic Biological Opinion (or any successor Programmatic Biological Opinion). The project will impact 0.06-acre of "suitable vernal pool rare plant habitat." Thus, the applicant shall secure 0.09-acre credits for Sebastopol meadowfoam (or as otherwise allowed by the Corps/USFWS) from the Sebastopol meadowfoam Core Area (Exhibit A; USFWS 2016). Any rare plant conservation credits purchased for the project shall be approved by the USFWS prior to the purchase of the credits. The applicant shall be required to provide proof that these conservation credits have been purchased to the City of Cotati prior to commencement of grading on the project site.</p> <p>BIO-4: According to the USFWS' 2007 Programmatic Biological Opinion, the portions of the 5.63-acre project that constitutes over summering or migration habitat of the California tiger salamander that are greater than 500 feet and within 2,200 feet of a known breeding site, and for projects beyond 2,200 feet from a known breeding site, but within 500 feet of an adult occurrence, would be mitigated at a 2:1 replacement to impacts ratio. Approximately 1.99 acres of the 5.63-acre project site is currently developed with buildings or hard-packed, gravel-impregnated roadways and parking areas around buildings. These developed surfaces do not constitute California tiger salamander habitat that warrants mitigation. In consideration of these mitigation ratios and the already developed surfaces that do not constitute California tiger salamander habitat on the project site, to compensate for impacts to 3.64 acres of California tiger salamander habitat that would occur from development of the project site, the</p>	<p>Project Applicant Project Biologist</p>	<p>Project Biologist USFWS CDFW CORPS</p> <p>Cotati Community Development Department</p> <p>Project Biologist USFWS CDFW CORPS</p>	<p>Prior to issuance of a grading permit</p> <p>Ongoing throughout project construction</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>Programmatic Biological Opinion (USFWS 2007) requires that applicant purchase 7.28 acres of California tiger salamander mitigation credit from a USFWS (and CDFW) approved Conservation Bank or as otherwise directed by the USFWS.</p> <p>In accordance with the USFWS' Recovery Plan (USFWS 2016) the applicant shall secure credits from the West Cotati Core California tiger salamander area (see Exhibit B of Biological Resource Analysis). Any conservation credits purchased for the project shall be approved by the USFWS prior to the purchase of the credits. The applicant shall be required to provide proof that these California tiger salamander conservation credits have been purchased to the City of Cotati prior to commencement of grading on the project site. In lieu of conservation bank credits, the applicant may preserve extant occupied California tiger salamander habitat in the West Cotati Core California tiger salamander area via recordation of a perpetual conservation easement. Any preservation plan would have to be approved by the USFWS and the CDFW.</p> <p>To ensure that migrating California tiger salamanders do not end up within the project site while under construction where they could be killed, prior to grading the project site, the developer shall surround the project site in California tiger salamander exclusion fencing. This fencing shall be inspected daily by a qualified biologist or a trained construction manager. In the event that a California tiger salamander is found trapped up against the fence and must be moved, it shall only be moved by a qualified 10(a)(1)(A) federally permitted and a state permitted California tiger salamander biologist. Any such relocation would be as permitted the USFWS and CDFW in their Incidental Take Permits issued to the project that address impact to the California tiger</p>				

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>salamander. Copies of the USFWS' Biological Opinion (Incidental Take Permit) and of the CDFW's 2081 Incidental Take Permit shall be provided to the City of Cotati prior to the commencement of grading on the project site.</p> <p>BIO-5: To avoid impacts to special-status bats, a qualified biologist shall conduct a pre-construction survey of the structures and trees that would be impacted by the project 15 days prior to removal or commencement of ground work. All bat surveys shall be conducted by a biologist with experience surveying for bats. If no special-status bats are found during the surveys, then building demolition and tree removal may commence. Per the recommendation of the CDFW, trees shall be trimmed and/or removed in a two-phased removal system conducted over two consecutive days. The first day (in the afternoon), limbs and branches would be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices or deep bark fissures would be avoided, and only branches or limbs without those features would be removed. On the second day, the entire tree would be removed.</p> <p>If special-status bat species are found roosting on the project site, the biologist shall determine if there are young present (i.e., the biologist should determine if there are maternal roosts). If young are found roosting in any tree or structure that will be impacted by the project, such impacts should be avoided until the young are flying and feeding on their own. A non-disturbance buffer installed with orange construction fencing should also be established around the maternity site. The size of the buffer zone should be determined by a qualified bat biologist at the time of the surveys. If adults are found roosting in a tree or structure on the project site but no maternal sites are</p>	<p>Project Applicant</p> <p>Project Biologist</p>	<p>Cotati Community Development Department</p> <p>Project Biologist</p>	<p>Prior to issuance of a demolition permit</p> <p>Ongoing throughout project construction</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>found, then the adult bats can be flushed or one-way eviction doors can be placed over any tree cavity (or structure access opening) supporting bat access for a 48-hour period prior to the time the tree or structure in question would be removed or disturbed. At that point, no other mitigation compensation would be required.</p> <p>BIO-6: In order to avoid impacts to nesting birds, site preparation activities including the removal of trees and building demolition shall occur outside of the bird-nesting season (September 1- January 31), otherwise pre-construction nesting bird surveys shall be conducted. To avoid impacts to nesting raptors and passerines, a nesting survey shall be conducted 15 days prior to commencing with construction work if this work would begin between February 1 and August 31. The nesting survey shall be conducted on the project site and within a zone of influence around the project site. The zone of influence includes those areas off the project site where raptors could be disturbed by earth-moving vibrations or noise. The nesting survey should include examination of all suitable nesting habitats within 300 feet of the entire project site. A nest survey report shall be prepared upon completion of the survey and provided to the City of Cotati with any recommendations required for establishment of protective buffers as necessary to protect nesting birds.</p> <p>If birds are identified nesting on or within the zone of influence of the construction project, a qualified biologist shall establish a temporary protective buffer around the nest(s). The buffer must be of sufficient size to protect the nesting site from construction-related disturbance and shall be established by a qualified ornithologist or biologist with extensive experience working with nesting birds near and on construction sites. Typically, adequate nesting buffers</p>	<p>Project Applicant Project Biologist</p>	<p>Cotati Community Development Department Project Biologist</p>	<p>Prior to issuance of a demolition permit Ongoing throughout project construction</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>are 75 feet from the nest site or nest tree dripline for small birds and up to 300 feet for sensitive nesting birds that include several raptor species known from the region of the project site. The nest buffer should be staked with orange construction fencing or orange lath staking.</p> <p>No construction or earth-moving activity shall occur within any established nest protection buffer prior to September 1 unless it is determined by a qualified ornithologist/biologist that the young have fledged (that is, left the nest) and have attained sufficient flight skills to avoid project construction zones, or that the nesting cycle is otherwise completed. In the region of the project site, most species complete nesting by mid-July. This date can be significantly earlier or later and would have to be determined by the qualified biologist. At the end of the nesting cycle, and abandonment of the nest by its occupants, as determined by a qualified biologist, temporary nest buffers may be removed, and construction may commence in established nesting buffers without further regard for the nest site.</p> <p>BIO-7: The applicant shall compensate for the loss of wetlands via the purchase of wetland credit from a Corps- and RWQCB-approved wetland mitigation bank. The applicant shall mitigate for project- related impacts to 0.06-acre of waters of U.S./State via the purchase of 0.10-acre of wetland credit, or as otherwise necessary to mathematically round upwards in acreage to the smallest rare plant credit available that compensates at no less than a 1:1 impacts to mitigation ratio. This is the minimum mitigation acreage. This credit acreage may be modified by the Corps and/or RWQCB and will appear as a condition of issued permits from these agencies. Should the mitigation requirements differ in the conditions of issued Corps and RWQCB permits, these conditions</p>	Project Applicant Project Biologist	Cotati Community Development Department RWQCB CORPS	Prior to issuance of grading permit	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>must be implemented by the project. Proof of the purchase of wetland mitigation credits shall be provided to the City of Cotati, the Corps, and the RWQCB in advance of grading activities on the project site.</p> <p>BIO-8: The project applicant/contractor shall ensure that trees to remain onsite are protected in accordance with the Section 17.54.040 of the City's Municipal Code and that trees to be removed are replaced in accordance with Section 17.54.050 of the City's Municipal Code as follows:</p> <ol style="list-style-type: none"> 1. In order to protect trees that will be preserved (both onsite and offsite) from injuries that may result from construction activities such as root, trunk or branch damage or harm during grading and trenching, the following shall be implemented: <ul style="list-style-type: none"> • Establish a tree protection zone (tpz) to be inspected and verified by a qualified arborist; • Install tree protection fencing and signage around the tpz prior to construction; • Restrict demolition, soil grading, trenching, and parking of vehicles within the tpz; • Cover exposed soil under canopies and throughout the tpz with mulch; • Monitor soil moisture to ensure that soil remains moist to a depth of 18"; • Conduct pruning by qualified personnel in accordance with current industry standards; and • Monitor all trenching and excavation activities 	Project Applicant Project Biologist	Cotati Community Development Department	<p>Prior to issuance of a grading permit</p> <p>Ongoing throughout project construction</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>inside the tpz by a qualified arborist.</p> <p>2. The removal of trees with a height of 50 feet or greater shall not occur between April 15 and June 15.</p> <p>3. In order to mitigate the removal of the protected trees (approximately 19), the applicant shall include the planting of approximately 140 (15-gallon Valley Oak trees) and approximately 28 (15-gallon trees of a species determined by the City of Cotati), onsite as part of the project's proposed landscaping or at a location determined by the City in agreement with the applicant. If onsite planting is not feasible, the applicant may be allowed to pay an in-lieu fee, at the sole discretion of the City. (The impacted trees and mitigation schedule per the City of Cotati Tree Ordinance are shown in Table A of the Biological Resource Analysis. The mitigation schedule may be modified by the City of Cotati.)</p>				
<p><u>CULTURAL RESOURCES</u></p> <p>CUL-1: A preconstruction cultural resource awareness training shall be held prior to commencement of ground-disturbing activities in order to familiarize the team with the potential to encounter prehistoric artifacts or historic-era archaeological deposits, the types of archaeological material that could be encountered within the project area, and procedures to follow in the event that archaeological deposits and/or artifacts are observed during construction. Historic-era resources potentially include all by-products of human land use greater than 50 years of age, including alignments of stone or brick, foundation elements from previous structures, minor earthworks, brick features, surface scatters of farming or domestic type material, and subsurface deposits of domestic type material (glass, ceramic, etc.). Artifacts that are typically found associated with</p>	<p>Project Applicant/Contractor</p> <p>Qualified Archeologist</p>	<p>Cotati Community Development Department</p>	<p>Ongoing throughout project construction</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>prehistoric sites in the area include humanly modified stone, shell, bone or other materials such as charcoal, ash and burned rock that can be indicative of food procurement or processing activities. Prehistoric domestic features include hearths, fire pits, house floor depressions and mortuary features consisting of human skeletal remains.</p> <p>CUL-2: If during the course of ground disturbing activities, including, but not limited to excavation, grading and construction, a potentially significant prehistoric or historic resource is encountered, all work within a 100 foot radius of the find (or as otherwise directed by a qualified archeologist) shall be suspended for a time deemed sufficient for a qualified and city-approved archeologist to adequately evaluate and determine significance of the discovered resource, confer with tribal representative, as appropriate, and provide treatment recommendations. Should a significant cultural resource be identified, a qualified archaeologist shall prepare a resource mitigation plan and monitoring program to be carried out during all construction activities.</p> <p>CUL-3 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 shall 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:</p> <p>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</p>	<p>Project Applicant/Contractor</p> <p>Qualified Archeologist</p> <p>Project Applicant/Contractor</p> <p>Qualified Archeologist</p>	<p>Cotati Community Development Department</p> <p>Cotati Community Development Department</p>	<p>Ongoing throughout project construction</p> <p>Ongoing throughout project construction</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the 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 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.</p> <p>2. Where the following conditions occur, the landowner or 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:</p> <ul style="list-style-type: none"> • 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 given access to the site. • The descendant identified fails to make a recommendation. • The landowner or authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner. 				
<p><u>Energy Resources</u></p> <p>Energy-1: See AQ-1 and AQ-2 and GHG-1</p>				

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<u>GEOLOGY AND SOILS</u>				
<p>GEO-1: Prior to issuance of a grading permit, a site-specific geotechnical investigation with subsurface exploration and laboratory testing shall be conducted to provide design-level recommendations and criteria for the project (pursuant to the recommendations of the Geotechnical Feasibility Evaluation prepared by Miller Pacific Engineering Group on April 15, 2016). The geotechnical investigation report shall be prepared and submitted to the City Engineer for review. The site-specific geotechnical investigation shall include, but not be limited to, the following: conduct subsurface exploration to confirm the absence of loose, saturated granular layers; and evaluate and provide recommendations for expansive soil mitigation measures. All recommendations of the site-specific geotechnical investigation report shall be incorporated into the project design, construction documents and improvement plans, or as otherwise determined by the City Engineer and/or Chief Building Official. The project's geotechnical engineer shall inspect the construction work and shall certify to the City, prior to issuance of a certificate of occupancy, that the improvements have been constructed in accordance with the geotechnical investigation report.</p>	Project Applicant Geotechnical Engineer	<p>Cotati Community Development Department</p> <p>Cotati City Engineer</p>	<p>Prior to issuance of grading permit</p> <p>Ongoing throughout project construction</p>	
<p>GEO-2: In the event that paleontological resources, including individual fossils or assemblages of fossils, are encountered during construction activities all ground disturbing activities shall halt and a qualified paleontologist shall be procured to evaluate the discovery and make treatment recommendations.</p>	Project Applicant Paleontologist	Cotati Community Development Department	Ongoing throughout project construction	
<u>Greenhouse Gases</u>				
<p>GHG-1: In order to ensure consistency with the Regional Climate Action Plan, Local Cotati Measures set forth</p>	Project Applicant	Cotati Community Development	Prior to Final Design	

15

16

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
1/2" of precipitation.				
<u>NOISE</u> NOI-1: Due to the proximity of sensitive receptors to the project site, all construction activities shall be required to comply with the following and be noted accordingly on construction plans: <ol style="list-style-type: none"> Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm on weekdays and 9:00 am and 5:00 pm on Saturdays (if allowed through specific project conditions of approval). No construction shall occur on Sundays or holidays. All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment. 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, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences. Unnecessary idling of internal combustion engines shall be prohibited. Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. The required construction-related noise mitigation plan shall also specify that haul truck deliveries are 	Project Applicant/Contractor	Cotati Community Development Department	Ongoing throughout project construction	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<p>subject to the same hours specified for construction equipment.</p> <p>8. Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing.</p> <p>9. The construction contractor shall designate a “noise disturbance coordinator” who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures as warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.</p> <p>NOI-2: The following measures shall be implemented to reduce interior noise levels to acceptable levels:</p> <ul style="list-style-type: none"> • Provide a suitable form of forced-air mechanical ventilation, as determined by the City of Cotati, for units throughout the site, so that windows can be kept closed at the occupant’s discretion to control interior noise and achieve the interior noise standards. • Sound-rated windows and doors, and other treatments including, but are not limited to, sound rated exterior wall construction methods, acoustical caulking, insulation, acoustical vents, shall be required. A design-level acoustical analysis shall be performed showing that interior noise levels of 45 dBA or below are achieved. A final determination of the required window and door sound ratings and other treatments shall be made during the Design Review phase to assure that the interior goal of 45 dBA is achieved. 	<p>Project Applicant/Contractor</p> <p>Acoustical Engineer</p>	<p>Cotati Community Development Department</p>	<p>Ongoing throughout project construction</p>	

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
<u>Tribal Cultural Resources</u> TCR-1: See Cul-1 through Cul-3				
<u>Cumulative Impacts</u> CUM-1: The applicant shall coordinate the project's construction activities and construction schedule with the City to minimize the concurrent construction of projects in the vicinity of the subject property and ensure that overlapping road closures, periods of increased noise and dust generation are minimized.	Project Applicant/Contractor	Cotati Community Development Department	Ongoing throughout project construction	