



Santero Way Specific Plan Update

Draft Environmental Impact Report State Clearinghouse #2023100654

prepared by

City of Cotati

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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed Santero Way Specific Plan (SWSP) Update (proposed project). This section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

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Project Description

This EIR has been prepared to examine the potential environmental effects of the SWSP Update. The following is a summary of the full project description, which can be found in Section 2, *Project Description*.

The SWSP Update (proposed project) is an update to existing land use designations to support a vision of a residentially-focused transit-oriented neighborhood. The SWSP would encourage development within walking distance of the Cotati SMART Station and would allow for mixed-use and neighborhood-serving retail and “maker” type light industrial development, community-serving uses, and transit-serving uses. The SWSP would revise the designated land uses through updated design standards and guidelines and a planning framework to facilitate and guide future development.

Within the SWSP area, 24 parcels are identified as potential sites subject to the proposed SWSP allowed land use change to allow between 25 and 35 dwelling units per acre, and a floor area ratio (FAR) of at least 1.0 for commercial development. New development projects, including redevelopment of existing parcels, would be required to comply with new objective design standards (described in more detail below). A maximum of 535 dwelling units and 543,759 square feet of non-residential commercial land uses would be developed within the SWSP Plan Area.

The proposed project also includes:

1. Expansion of the SWSP Plan Area to add up to four parcels encompassing up to 4 acres;
2. Rezoning of up to nine parcels up to 15 acres located outside the SWSP Plan Area but within 0.5 mile of the Cotati SMART Station; and
3. The establishment of development standards and design guidelines to ensure compatibility with existing land uses and project objectives.

The project would result in the rezoning, land use designation change, and/or change to allowable development under the SWSP to allow between 25 and 35 dwelling units per acre, and a floor area ratio (FAR) of at least 1.0 for commercial development. A total of 27 parcels would be rezoned and a total of 3 parcels would undergo a land use designation change.

The SWSP Update includes the following guiding principles:

- Housing
 - Develop Affordable, Multifamily, and Workforce Housing
 - Adopt Plan Area Design & Development Standards
- Transportation and Connectivity
 - Improve Multimodal Connections
 - Improve SMART Station Access
 - Support Bicycle & Vehicle Parking for New & Existing Land Uses
- Economy
 - Support A Mix of Commercial Uses
 - Incentivize Mixed-Use Development
- Transit-Oriented Community Policy Implementation
 - Rezone Land for Transit-Oriented Development
 - Promote Housing Production, Preservation, and Protection

The SWSP Update also proposes an internal emergency vehicle access connection between Breen Way and Santero Way, across APN 144-302-048. The SWSP Update specifies street and drive aisle lane widths, includes internal bicycle and pedestrian pathways, specifies development standards in the proposed zoning districts, and identifies if infrastructure improvements are necessary in the SWSP area.

Transit Oriented Communities Standards

The City of Cotati is a member of the Metropolitan Transportation Commission (MTC), a multi-jurisdictional planning agency representing all cities, towns, and counties within the nine-county Bay Area. Recent policy development on the regional level has included new development standards for Plan Areas within Transit-Oriented Communities (TOC). TOC policies will apply within 0.5 mile of major transit stops, and major funding for local infrastructure projects is conditioned on TOC compliance. Among other requirements, land uses within the 0.5-mile TOC Station Areas need to have an allowable residential density of 25 to 35 units per acre throughout the 0.5-mile area surrounding the Station. This requirement applies to the Cotati SMART Station.

Within the TOC Area in the City of Cotati, nine parcels are identified as sites for rezoning to allow between 25 and 35 dwelling units per acre, and a FAR of at least 1.0 for commercial development. TOC parcels within the SWSP Plan Area would be subject to SWSP residential design standards, and TOC parcels outside the SWSP Plan Area will be subject to the City's existing design standards. The TOC parcels are expected to accommodate 235 dwelling units and approximately 192,289 square feet of commercial development.

Objective Design Standards

As a part of the proposed zoning changes, objective design standards regulating aesthetics (architectural style, building proportions, building types, civic spaces, etc.) would be adopted for the SWSP area. The TOC parcels (outside the SWSP Plan Area) will be subject to the City's existing design standards. The City maintains Objective Design Standards that apply to all multi-family residential projects; development facilitated by the project would be subject to these standards. The project would amend the existing Objective Design Standards (Cotati Municipal Code Section 17.39.030) to provide greater flexibility on style without compromising building quality in the project area.

Anticipated Total Growth and Development

The SWSP envisions the development of additional housing that, if built, would result in an increase in population within the City of Cotati. A maximum of 535 dwelling units and 459,076 square feet of non-residential commercial land uses would be developed within the SWSP Area. Within the TOC Area, a maximum of 235 dwelling units would be developed along with approximately 192,289 square feet of non-residential commercial. Therefore, the project would result in a net increase of 769 residential units, 651,365 square feet of commercial development, and approximately 1,800 residents, as compared to existing conditions in the project area.

Utility Upgrades

Based on a preliminary water and wastewater infrastructure capacity review, it is anticipated that the sewer pipeline located within Santero Way, within the SWSP area of the proposed project, will require upsizing from 6-inch diameter pipe to 8- or 10-inch diameter pipe. This will be necessary to meet minimum pipe diameter and capacity constraints. No other utility upgrades to the water or wastewater systems are anticipated to be necessary.

Project Objectives

- Increase opportunities for residential development by identifying suitable areas and ensuring compliance with zoning and environmental standards.
- Promote smaller-scale commercial development by encouraging diverse commercial districts that contribute to the City's identity, culture, and economy, provide jobs, and generate revenue for the City.
- Support mixed-use development to serve community needs by integrating residential, "maker" scale light industrial, commercial, and community spaces, and enhancing neighborhood vibrancy and walkability.
- Expand community spaces and amenities by developing public spaces, renovating existing facilities, and engaging residents in planning priorities.
- Meet Transit-Oriented Communities (TOC) requirements for station areas by developing guidelines, enhancing accessibility, and integrating sustainable design practices into transit-oriented development projects.

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the proposed project. Studied alternatives include the following three alternatives. Based on the alternatives analysis, Alternative 3 was determined to be the environmentally superior alternative.

- Alternative 1: No Project
- Alternative 2: Station-Oriented Density
- Alternative 3: Modified Density Allocation

Alternative 1 (No Project) assumes that the proposed Specific Plan Update and rezoning of TOC parcels associated with the proposed project would not occur, and development within the project area would be limited by the existing zoning and land use designations of individual parcels. Alternative 1 would not expand the SWSP area, and parcels currently outside of the SWSP area would not undergo zoning or land use designation changes. Additionally, the current SWSP, with the current development allowances, would continue to provide land use control over the current SWSP area. Based on the history of stalled redevelopment of the SWSP area, it is not anticipated that substantial development would occur in the SWSP area under this alternative.

Alternative 2 (Station-Oriented Density) would rezone parcels within the SWSP area only. Alternative 2 would establish a residential density minimum of 36 units per acre and maximum of 61 units per acre within the SWSP area. This increased density in the SWSP area would satisfy requirements based on preliminary analysis and guidance from MTC regarding the TOC station area. However, Alternative 2 may not achieve the project objective of encouraging and facilitating commercial development, as commercial square footage in the SWSP area under Alternative 2 would be the same as under the proposed project, but with no additional commercial space proposed on the TOC parcels. Furthermore, this alternative would not implement the objective of TOC policy implementation because a majority of the parcels within the 0.5-mile radius of the SMART station would not be evaluated for TOC policy implementation.

Alternative 3 (Modified Density Allocation) would rezone parcels within the SWSP area and would rezone TOC parcels, similar to the proposed project. However, the density of parcels in the SWSP area would be reduced under this alternative, with the density of the TOC parcels increased. The intent of this alternative is to reduce traffic noise impacts on Santero Way that would occur with the proposed project. The commercial square footage would remain the same as the proposed project. Alternative 3 would meet all project objectives, similar to the proposed project.

Refer to Section 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify any areas of known controversy for the proposed project. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the City are summarized in Section 1, *Introduction*.

Issues to be Resolved

The proposed project would require certification of the EIR prepared for the SWSP Update and rezoning of TOC parcels to a new TOC Zoning District. Additionally, the City of Cotati City Council would need to approve the Specific Plan Amendment for the SWSP Update and approve the rezoning of the TOC parcels and select SWSP parcels.

Issues Not Studied in Detail in the EIR

Section 4.16, *Effects Found Not to be Significant*, includes an analysis of environmental topic areas found not to be significant. As indicated in Section 4.16, there is no substantial evidence that significant impacts would occur to the following issue areas: Agriculture and Forestry Resources, Energy, Mineral Resources, and Wildfire.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the *CEQA Guidelines*.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Significance After Mitigation
Aesthetics		
Impact AES-1. Development facilitated by the project would not have a substantial adverse effect on a scenic vista. Therefore, impacts related to scenic vistas would be less than significant.	None required.	Less than significant
Impact AES-2. There are no designated state scenic highways in the vicinity of the proposed project. No impact to scenic resources within a state scenic highway would occur.	None required.	No impact
Impact AES-3. Implementation of the proposed project would facilitate development on previously undeveloped parcels and would change development standards including residential density, building heights, allowed uses, and parking requirements. However, scenic quality would be protected through adherence to City design guidelines and implementation of goals and policies in the Cotati General Plan that address visual character and quality of public views. Impacts would be less than significant.	None required.	Less than significant
Impact AES-4. Development facilitated by the project would introduce new sources of light and glare in the project area. With adherence to existing ordinances that regulate light and glare for new development, impacts would be less than significant.	None required.	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
Air Quality		
Impact AQ-1. The proposed project would be consistent with BAAQMD's 2017 Clean Air Plan as well as the Cotati General Plan and existing Santero Way Specific Plan. Impacts would be less than significant.	None required.	Less than significant
Impact AQ-2. Development facilitated by the project would result in the temporary generation of air pollutants during construction, which would affect local air quality. Policy CON 2.5 in the General Plan requires individual projects to incorporate the BAAQMD Basic Construction Mitigation Measures, which would reduce construction emissions. The vehicle miles traveled increase from project operation is less than the project's projected population increase. Impacts would be less than significant.	None required.	Less than significant
Impact AQ-3. Development facilitated by the proposed project may expose sensitive receptors to additional sources of toxic air contaminants (TAC). However, adherence to policies in the General Plan would minimize health risks from sources of TAC emissions. Impacts would be less than significant.	None required.	Less than significant
Impact AQ-4. Development facilitated by the proposed project would not introduce new odor-generating land uses. Impacts related to other emissions, such as those leading to odors, would be less than significant.	None required.	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
Biological Resources		
Impact BIO-1. The project would not have a substantial adverse effect on special-status animal species. However, development facilitated by the project could result in adverse effects to nesting birds directly through nest destruction during construction or construction-related disturbance. Impacts would be less than significant with mitigation.	BIO-1. Nesting Bird Survey. If construction is scheduled to occur during the nesting bird season (February 1 through August 31), the project applicant shall retain a qualified biologist to conduct a pre-construction nesting bird survey no more than 14 days prior to the start of construction to determine the presence/absence of nesting birds and raptors within the project sites and adjacent areas. The survey shall include the entire site plus a 100-foot buffer, as accessible. If active nests are found, the qualified biologist shall establish an appropriate avoidance buffer, considering the species sensitivity and physical location of the nest (line of site to the work area), to comply with CFGC 3503 and 3503.5. In no case shall the buffer be smaller than 50 feet for non-raptor bird species and 250 feet for raptor species. To prevent encroachment, the established buffer(s) shall be clearly marked by high visibility material installed by the contractor. The established buffer(s) shall remain in effect until the young have fledged or the nest has been abandoned as confirmed by the qualified biologist. The City shall review and approve the biologists' findings and buffer during construction as appropriate.	Less than significant with mitigation
Impact BIO-2. The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. There would be no impact.	None required	No impact
Impact BIO-3. The project would not have a substantial adverse effect on state or federally protected wetlands. There would be no impact.	None required	No impact
Impact BIO-4. The project would not 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. There would be no impact.	None required	No impact
Impact BIO-5. The project would not conflict with any local policies or ordinances protecting biological resources. This impact would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact BIO-6. The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There would be no impact.	None required	No impact
Cultural Resources		
Impact CUL-1. Development facilitated by the project could cause a substantial adverse change in the significance of a historical resource. This impact would be significant and unavoidable.	CUL-1a. Identification of Historical Resources. A historical resources evaluation shall be prepared for projects carried out within the project area involving the demolition or physical alteration of a building, structure, object, or other built environment feature that is 45 years of age or older, that has not been subject to evaluation as part of this study, as outlined in Table 4.4 1. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources within the proposed development site. Properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. Evaluated properties shall be documented on applicable Department of Parks and Recreation Series 523 Forms. The report must be submitted to the City for review and concurrence. The final report must be submitted to the Northwest Information Center. If the property is already a historical resource as defined by <i>CEQA Guidelines</i> Section 15064.5(a), the historical resources evaluation described above shall not be required.	Significant and Unavoidable

Table 4.4-1 Properties to be Evaluated

APN	Address	Build Year	Age Eligible	45 Year Threshold	Relationship to Project
144-292-023	640 East Cotati Avenue	2004	No	2049	TOC Parcel
144-292-024	680 East Cotati Avenue	c. 1983-1992+	No	2028	TOC Parcel
144-301-010	905 East Cotati Avenue	1920/1975	Yes	–	TOC Parcel
144-302-022	768 East Cotati Avenue	1954	Yes	–	TOC Parcel
144-302-050	766 East Cotati Avenue	1989	No	2034	TOC Parcel
144-501-004	556 East Cotati Avenue	1973	Yes	–	TOC Parcel
144-570-001	475 East Cotati Avenue	1984	No	2029	TOC Parcel
144-720-029	501 East Cotati Avenue	1945/1956	Yes	–	TOC Parcel

Impact	Mitigation Measure (s)						Significance After Mitigation
	144-720-040	525 East Cotati Avenue	1994	No	2039	TOC Parcel	
	144-770-021 to 144-770-070	6305-7012 Santero Way	2004	No	2049	SWSP Parcel	
	144-302-047	930 East Cotati Avenue	1990	No	2035	SWSP Parcel	
	144-302-049	924 East Cotati Avenue	1994	No	2039	SWSP Parcel	
	144-480-008	8354 Santero Way	1987	No	2032	SWSP Parcel	
	144-790-001 to 144-790-016	7046 to 7062 Santero Way	2006	No	2051	SWSP Parcel	
<p>CUL-1b. Treatment of Historical Resources. If a project would occur on a site containing a historical resource as identified during implementation of Mitigation Measure CUL-1a, impacts must be mitigated, to the extent feasible, to historical resources identified within a proposed development site. Application of mitigation shall be overseen by an architectural historian, historian, and/or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., avoidance).</p> <p>Mitigation may include avoidance, or preservation, rehabilitation, restoration, or reconstruction of the resource consistent with the Secretary of the Interior’s Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4[b][1]). A report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards must be submitted to the City for review and approval prior to the issuance of permits.</p> <p>If historical resources are identified on a development site and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken as determined by a PQS historian, architectural historian, and/or historic architect and the City. Mitigation measures may include, but are not limited to, Historic American Building Survey (HABS)-Like report, interpretive signage, and relocation. The mitigation shall be completed and submitted to the City prior to issuance of permits for demolition or alteration of the historical resource.</p>							

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact CUL-2. The project has the potential to cause a significant impact on archaeological resources if development facilitated by the project would cause a substantial adverse change in the significance of an archaeological resource, including those that qualify as historical resources. This impact would be less than significant with mitigation.	<p>CUL-2a. Archaeological Resources Assessment. For future projects involving ground disturbance either on parcels not previously studied (as outlined in Table 4.4-2), on parcels previously studied but the <i>Santero Way Specific Plan Update Project Cultural Resources Technical Report</i> (Rincon Consultants, Inc. 2024) is more than five years old, and/or if conditions on the project parcel has changed substantially, the project applicant(s) shall prepare a Phase I archaeological resources assessment under the supervision of an archaeologist meeting the PQS in archaeology (National Park Service 1983). Assessments must include a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center at Sonoma State University, Sacred Lands File search maintained by the Native American Heritage Commission, and intensive-level pedestrian survey, and archaeological sensitivity analysis. The assessment must be completed prior to project approval.</p> <p>If the Phase I archaeological resources assessment identifies resources that may be affected by the project, an extended Phase I testing program, Phase II testing and evaluation, and/or archaeological monitoring may be required, as determined by the qualified archaeologist. If resources are determined significant or unique, avoidance or preservation-in-place may reduce impacts to a less than significant level. If avoidance is not possible, appropriate site-specific mitigation measures shall be identified. These measures may include, but would not be limited to, a Phase III data recovery program and curations, or other appropriate actions to be determined by a qualified archaeologist and City. The City will review and approve reports and ensure that mitigation measures are implemented as appropriate prior to or during construction.</p>	Less than significant with mitigation

Table 4.4-2 Parcels Not Previously Studied

APN	Address	Relationship to Project
144-292-023	640 East Cotati Avenue	TOC Parcel
144-292-024	680 East Cotati Avenue	TOC Parcel
144-301-010	905 East Cotati Avenue	TOC Parcel
144-302-022	768 East Cotati Avenue	TOC Parcel
144-302-050	766 East Cotati Avenue	TOC Parcel
144-501-004	556 East Cotati Avenue	TOC Parcel
144-570-001	475 East Cotati Avenue	TOC Parcel
144-720-029	501 East Cotati Avenue	TOC Parcel
144-720-040	525 East Cotati Avenue	TOC Parcel
144-770-021 to 144-770-070	6305-7012 Santero Way	SWSP Parcel
144-051-037	None	SWSP Parcel

Impact	Mitigation Measure (s)			Significance After Mitigation
	144-302-047	930 East Cotati Avenue	SWSP Parcel	
	144-302-049	924 East Cotati Avenue	SWSP Parcel	
	144-310-007 to 144-310-008	None	SWSP Parcel	
	144-320-018	None	SWSP Parcel	
	144-320-026	None	SWSP Parcel	
	144-320-027	6050 Santero Way – Cotati SMART Station parking lot	SWSP Parcel	
	144-320-029	None	SWSP Parcel	
	144-480-008	8354 Santero Way	SWSP Parcel	
	144-480-015 to 144-480-017	None	SWSP Parcel	
	144-480-019	None	SWSP Parcel	
	144-770-071 to 144-770-074	None	SWSP Parcel	
	144-790-001 to 144-790-016	7046 to 7062 Santero Way	SWSP Parcel	
	144-790-COM	None	SWSP Parcel	

CUL-2b. Unanticipated Discoveries. In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the PQS for archaeology shall be contacted immediately to evaluate the resource. If the resource is determined by the PQS archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the PQS archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a PQS archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Section 15126.4(b)(3)(C).

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact CUL-3. Ground disturbance associated with development facilitated by the project may disturb or damage unknown human remains. Adherence with existing regulations would ensure impacts would be less than significant.	None required	Less than significant
Geology and Soils		
Impact GEO-1. There are no known faults within the project area. The project would not directly cause potential substantial adverse effects involving rupture of a known earthquake fault and impacts would be less than significant.	None required	Less than significant
Impact GEO-2. The project would facilitate development in a seismically active area that could be subject to seismic ground shaking. Compliance with applicable regulations, including the California Building Code and Cotati Municipal Code, would reduce the potential for substantial adverse effects related to seismic ground shaking to occur and would reduce this impact to a less than significant level.	None required	Less than significant
Impact GEO-3. The project would facilitate development in a seismically active area that could be subject to seismic-related ground failure, such as liquefaction. Compliance with applicable regulations, including the California Building Code and Cotati Municipal Code, would reduce the potential for substantial adverse effects related to liquefaction to occur, and would reduce this impact to a less than significant level.	None required	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact GEO-4. The project area is not located in an area with landslide potential. The project would not directly cause potential substantial adverse effects related to landslides and no impact would occur.	None required	Less than significant
Impact GEO-5. Development facilitated by the project would include ground disturbance such as excavation and grading that would result in loose or exposed soil, increasing the potential for erosion and soil loss. Compliance with applicable regulations, including the Clean Water Act, Cotati Municipal Code, and Cotati General Plan, would reduce the potential for erosion and loss of topsoil and would reduce this impact to a less than significant level.	None required	Less than significant
Impact GEO-6. Construction and occupancy of development facilitated by the proposed project could be located on geologic units that are unstable, resulting in landslide, lateral spreading, subsidence, liquefaction, or collapse. However, required adherence to the CBC and Cotati Municipal Code would reduce potential impacts to a less than significant level.	None required	Less than significant
Impact GEO-7. Development facilitated by the project has the potential to be located on expansive soils. With required adherence to the CBC and Cotati Municipal Code, impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact GEO-8. Development facilitated by the proposed project would not require the use of septic tanks or alternative wastewater disposal systems. No impact would occur.	None required	No impact
Impact GEO-9. Development facilitated by the project has the potential to impact paleontological resources. Impacts would be less than significant with mitigation incorporated.	<p>GEO-9a. Unanticipated Discovery of Paleontological Resources. The City shall require the following mitigation measure for all projects involving ground disturbance of sediments that may have high paleontological sensitivity (i.e., sediments greater than 5 feet below the surface) in order to mitigate potential impacts to unanticipated paleontological resources discovered during project construction:</p> <ul style="list-style-type: none"> ▪ The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Qualified Professional Paleontologist as defined by the Society of Vertebrate Paleontology (SVP; 2010). If the find is determined to be scientifically significant, the Qualified Professional Paleontologist shall direct all mitigation measures related to paleontological resources consistent with the SVP (2010) standards, which shall include fossil salvage, laboratory preparation, curation in a paleontological repository, and a paleontological monitoring report. Additionally, the Qualified Professional Paleontologist and City shall decide if full- or part-time monitoring shall be instated for further project-related excavations. A Qualified Professional Paleontologist, is defined by the SVP (2010) as an individual with: <ul style="list-style-type: none"> ▫ A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience. ▫ At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts. ▫ Proficiency in recognizing fossils in the field and determining their significance. ▫ Expertise in local geology, stratigraphy, and biostratigraphy. ▫ Experience collecting vertebrate fossils in the field. <p>GEO-9b. Paleontological Resources Mitigation During Construction. For projects that could disturb previously undisturbed sediments greater than 5 feet below the surface, the project applicant shall:</p> <ul style="list-style-type: none"> ▪ Retain a Qualified Professional Paleontologist. The Qualified Professional Paleontologist shall determine the applicable following mitigation measures depending on the volume of the proposed ground disturbance, nature of the proposed ground disturbance, development history of the project site, and/or 	Less than significant with mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>other criteria. The Qualified Professional Paleontologist shall oversee the implementation of these mitigation measures which may include some, all, or none of the following:</p> <ul style="list-style-type: none"> ▫ Paleontological Worker Environmental Awareness Program. Prior to the start of construction, a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP; 2010), or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel. The WEAP shall discuss the potential to discover paleontological resources in the project site, legal obligations to protect paleontological resources, examples of paleontological resources that may be found in the project site, procedures in case a paleontological resource is discovered, and contact information for the Qualified Professional Paleontologist. ▫ Paleontological Monitoring. Paleontological monitoring shall be conducted by a paleontological monitor with experience with collection and salvage of paleontological resources and who meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor, meaning an individual with: <ul style="list-style-type: none"> – BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or – AS or AA in geology, paleontology, or biology and demonstrated two years’ experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or – Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project. <p>Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.</p> <p>The Qualified Professional Paleontologist has the authority to determine the duration, frequency, and specific locations, of paleontological monitoring, which may change during project construction based on geological observations made during monitoring.</p> <ul style="list-style-type: none"> ▫ Paleontological Resource Discovery Protocols. In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease until the discovery can be evaluated by the Qualified Professional Paleontologist. If a fossil is not scientifically significant, then construction activity may resume. If it is determined that a fossil is potentially scientifically significant, the following shall be completed: 	

Impact	Mitigation Measure (s)	Significance After Mitigation
	<ul style="list-style-type: none"> – The paleontological monitor shall salvage (excavate and recover) the fossil to protect it from damage/destruction. Typically, fossils can be safely salvaged quickly by a single paleontological monitor with minimal disruption to construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrate fossils. After a fossil is salvaged, construction activity may resume. – Fossils shall be identified to the lowest (most-specific) possible taxonomic level, prepared to a curation-ready condition, and accessioned to a paleontological repository, defined by the SVP (2010) as a “not-for-profit museum or university approved by the lead agency and employing a permanent curator responsible for paleontological records and specimens,” alongside all metadata (e.g., maps, coordinates, stratigraphic/geologic data, etc.) required by the paleontological repository. ▫ Paleontological Monitoring Report. This measure shall be required if paleontological monitoring occurred or significant paleontological resources were discovered. Upon completion of ground-disturbing activities (or laboratory preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a report describing the results of the paleontological monitoring efforts. The report shall include a summary of field and laboratory methods employed; an overview of project geology; and, if fossils were discovered, an analysis of the fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the City and, if fossil curation occurred, the paleontological repository. 	
Greenhouse Gas Emissions		
<p>Impact GHG-1. Development facilitated by the project would not be consistent with BAAQMD’s building and transportation thresholds. Even with implementation of proposed Mitigation Measure GHG-1, this impact would remain significant and unavoidable.</p>	<p>GHG-1. Consistency with BAAQMD’s Project-Level GHG Threshold. The following shall be a condition of approval for future developments facilitated by the project:</p> <p>Greenhouse Gas Emissions Reductions. Development under the Specific Plan and on the TOC parcels shall not include natural gas appliances or natural gas plumbing.</p> <p>EV Charging. Development under the Specific Plan and on the TOC parcels shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.</p>	<p>Significant and unavoidable</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
Hazards and Hazardous Materials		
Impact HAZ-1. Development facilitated by the project could result in the routine transport, use, or disposal of potentially hazardous materials. However, compliance with local, regional, State, and federal regulations related to hazardous materials would minimize hazards to the public or environment from these materials. Impacts would be less than significant.	None required	Less than significant
Impact HAZ-2. Development facilitated by the project would not 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. Impacts would be less than significant.	None required	Less than significant
Impact HAZ-3. Development facilitated by the project could result in hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. However, compliance with existing regulatory requirements would minimize risks to schools and students, resulting in a less than significant impact.	None required	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact HAZ-4. Development facilitated by the project could result in development on sites listed pursuant to Government Code Section 65962.5. However, compliance with applicable regulations relating to site remediation would minimize impacts from development, resulting in a less than significant impact.	None required	Less than significant
Impact HAZ-5. Development facilitated by the project would not be located within an airport land use plan or within two miles of a public airport and people residing or working in the plan area would not be exposed to airport safety hazards or excessive noise. No impact would occur.	None required	No impact
Impact HAZ-6. Development facilitated by the project would result in additional population and vehicle miles traveled in the city. Construction of development facilitated by the proposed project could result in roadway conflicts and would require mitigation. The project would not result in changes to emergency evacuation routes nor would it substantially increase roadway congestion such that the use of an evacuation route would be hindered. Impacts would be less than significant with mitigation.	<p>HAZ-6. Traffic Control Plan. A Traffic Control Plan (TCP) shall be developed prior to issuance of grading permits and implemented by the project applicant and/or their construction contractor(s) during construction of the proposed project. The TCP shall include but not be limited to:</p> <ul style="list-style-type: none"> ▪ The TCP shall identify construction staging site locations and potential road closures, alternate routes for detours, and planned truck routes for construction-related vehicle traffic, including but not limited to haul trucks, material delivery trucks, and equipment delivery trucks. It shall also identify alternative safe routes and policies to maintain safety along bicycle and pedestrian routes during construction. Construction traffic routes shall avoid local residential streets to the maximum extent practicable. Staging locations, alternate detour routes, and construction traffic routes shall avoid other active construction projects within 0.25 mile of the project construction site to the maximum extent practicable. ▪ The TCP shall provide for traffic control measures including flag persons, warning signs, lights, barricades, cones, and/or detour routes to provide safe passage of vehicular, bicycle, and pedestrian traffic and access by emergency responders. ▪ Prior to the start of construction, written notice shall be provided regarding potential land and/or road closures as described in the plan. Notice shall be delivered to potentially affected properties within a 500-foot radius of the construction site. The notice shall contain a brief description of the work, work dates, and contact information of the City of Cotati Community Development Department. The notice shall be delivered ten calendar days prior to beginning the work and again at two working days prior to 	Less than significant with mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>beginning the work. A revised notice shall be delivered in the event of delays in schedule as soon as reasonably practicable after a delay is identified and the revised schedule is known.</p> <p>The TCP shall be submitted to the City of Cotati Public Works and Engineering Department for review and approval prior to the issuance of a grading permit. The City of Cotati shall also ensure the plan is reviewed by emergency services personnel to ensure adequate emergency access is maintained throughout the construction period. The City shall confirm implementation of the plan during construction as part of routine site inspections.</p>	
<p>Impact HAZ-7. Development facilitated by the project would be located in a built urban environment and would not result in people or structures to be exposed to significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.</p>	<p>None required</p>	<p>Less than significant</p>
Hydrology and Water Quality		
<p>Impact HYD-1. Development facilitated by the project would not violate water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. Individual development projects are required to comply with State and local water quality regulations and permit requirements for both construction and operation. Impacts would be less than significant.</p>	<p>None required</p>	<p>Less than significant</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact HYD-2. Development facilitated by the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that sustainable groundwater management of the basin would be impeded. Future development would adhere to City policies and regulations and comply with NPDES requirements. Impacts would be less than significant.	None required	Less than significant
Impact HYD-3. Development facilitated by the project may alter drainage patterns on individual parcels and incrementally increase overall runoff volumes in the project area, but would not result in substantial erosion or siltation, result in increased flooding, exceed the capacity of existing or planned stormwater drainage systems, or result in substantial additional polluted runoff. Impacts would be less than significant.	None required	Less than significant
Impact HYD-4. Development facilitated by the project would result in the addition of impervious surfaces, which could increase runoff and result in flooding or the redirection of flood flows. Development could also be located within a flood hazard zone. Compliance with the NPDES MS4 General Permit and Cotati Municipal Code would reduce impacts to less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact HYD-5. Development facilitated by the project would not interfere substantially with a water quality control plan or sustainable groundwater management plan. Future development would adhere to Cotati General Plan goals and policies and comply with NPDES requirements. Impacts would be less than significant.	None required	Less than significant
Land Use and Planning		
Impact LU-1. The proposed project would promote infill development in the project area and would not facilitate development that would physically divide an established community. Impacts would be less than significant.	None required	Less than significant
Impact LU-2. Development facilitated by the proposed project would be generally consistent with applicable land use plans, policies, or regulations adopted to avoid or mitigate environmental effects. Impacts would be less than significant.	None required	Less than significant
Noise		
Impact NOI-1. Construction of development facilitated by the project would temporarily increase noise levels at nearby noise-sensitive receptors. Operation of development facilitated by the project would introduce new noise sources and contribute to increases in traffic noise. Construction and operational noise could exceed noise standards. Construction noise and operational traffic noise impacts would be significant and unavoidable despite the implementation of mitigation.	<p>N-1a. Construction-Related Noise Reduction Measures. Similar to Action N 1h in the Cotati General Plan (City of Cotati 2015), the City shall require, as a standard condition of approval, that project applicants apply the following measures during construction of individual development projects within the project area.</p> <ul style="list-style-type: none"> ▪ Mufflers. Construction equipment shall be properly maintained and all internal combustion engine driven machinery with intake and exhaust mufflers and engine shrouds, as applicable, shall be in good condition and appropriate for the equipment. During construction, all equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers, consistent with manufacturers' standards. ▪ Electrical Power. Electrical power, rather than diesel equipment, shall be used to run compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities. 	Significant and unavoidable

Impact	Mitigation Measure (s)	Significance After Mitigation
	<ul style="list-style-type: none"> ▪ Stationary Equipment. All stationary equipment shall be staged as far away from the adjacent sensitive receptors as feasible. ▪ Equipment Idling. Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use. ▪ Workers' Radios. All noise from workers' radios shall be controlled to a point that they are not audible at sensitive receptors near construction activity. ▪ Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction in compliance with applicable safety laws and regulations. ▪ Disturbance Coordinator. The applicant shall designate a disturbance coordinator who shall be responsible for responding to any local complaints about construction noise. The noise disturbance coordinator shall determine the cause of the noise complaint and shall require that reasonable measures warranted to correct the problem be implemented. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site. ▪ Temporary Sound Barriers. Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA L_{eq} at residential receivers, schools or other sensitive receptors during the daytime) and when the anticipated construction duration is greater than is typical (e.g., two years or greater). Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class 32 or higher. <p>N-1b. Conduct Stationary Operational Noise Analysis. The City shall require future development projects that are subject to General Plan Policies N 1.2, N 1.3, and N 1.11 as a condition of approval and to implement any required mitigation measures as recommended by a qualified acoustical consultant to minimize impacts on these uses. Examples of mitigation measures to reduce on-site noise include, but are not limited to, operational restrictions, selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.</p>	

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact NOI-2. Construction of development facilitated by the project would temporarily generate groundborne vibration. If required for construction, pile driving or use of a vibratory roller or heavy earthmoving equipment could potentially exceed the City of Cotati's vibration thresholds and impact people or buildings. This impact would be less than significant with mitigation.	N-2. Vibration Control Plan. Prior to issuance of a building permit for a project in the project area that would require the use of pile driving during construction within 180 feet of fragile structures such as historical resources or within 75 feet of buildings of conventional construction; a vibratory roller within 50 feet of fragile historical resources or 20 feet of buildings of conventional construction; or a dozer or other large earthmoving equipment within 27 feet for a fragile historical structure or 12 feet of buildings of conventional construction, the project applicant shall prepare a vibration analysis to assess and mitigate potential noise and vibration impacts related to these construction activities. This vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed the City of Cotati's vibration criteria for architectural damage thresholds (e.g., 0.08 in/sec PPV for fragile or historical resources and 0.3 in/sec PPV for buildings of conventional construction). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, static rollers as opposed to vibratory rollers, and lower horsepower earthmoving equipment shall be used. If alternative methods are not feasible or vibration levels are still predicted to exceed the City's standards, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded. The study should be submitted to the City prior to permit approval for review and confirmation that the requirements of this measure have been incorporated.	Less than significant with mitigation
Impact NOI-3. The proposed project would not expose people residing or working the plan area to excessive noise levels from airport land use. There would be no impact.	None required	No impact
Population and Housing		
Impact POP-1. Development facilitated by the project would accommodate additional residents and dwelling units but would not exceed Plan Bay Area 2050 population and housing forecasts and would be consistent with the City's Housing Element. The project would not result in unplanned population growth. Impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact POP-2. Development facilitated by the project could displace existing housing or people, necessitating the construction of replacement housing elsewhere. However, impacts would be less than significant.	None required	Less than significant
Public Services and Recreation		
Impact PS-1. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered fire facilities to maintain acceptable service ratios and response times. Impacts would be less than significant.	None required	Less than significant
Impact PS-2. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered police facilities to maintain acceptable service ratios. Impacts would be less than less than significant.	None required	Less than significant
Impact PS-3. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered school facilities. Impacts would be less than significant.	None required	Less than significant
Impact PS-4. Development facilitated by the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios. Impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact PS-5. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered library facilities to maintain acceptable service objectives as new development would be considered infill. Impacts would be less than significant.	None required	Less than significant
Transportation		
Impact TRA-1. Development facilitated by the project would result in increased usage of the circulation system including transit, roadway, bicycle, and pedestrian facilities. However, existing regulations would ensure that development and use of the circulation system is consistent with adopted programs, plans, ordinances, and policies. Therefore, impacts would be less than significant.	None required	Less than significant
Impact TRA-2. The proposed project would meet the City's screening criteria for low-VMT areas and would be consistent with <i>CEQA Guidelines</i> Section 15064.3, subdivision (b). Impacts would be less than significant.	None required	Less than significant
Impact TRA-3. The proposed roadway improvements and site access measures would be designed and reviewed in accordance with City standards. This impact would be less than significant.	None required	Less than significant
Impact TRA-4. The proposed project would not result in inadequate emergency access. This impact would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
Tribal Cultural Resources		
<p>Impact TCR-1. Development facilitated by the project has the potential to impact tribal cultural resources. Impacts would be less than significant with mitigation.</p>	<p>TCR-1. Suspension of Work Around Tribal Cultural Resources During Construction. In the event that cultural resources of Native American origin are identified during construction of a project, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, the applicant shall prepare and implement a mitigation plan in accordance with State guidelines and in consultation with local Native American group(s). The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City shall review and approve the mitigation plan prior to implementation</p>	<p>Less than significant with mitigation</p>
Utilities and Service Systems		
<p>Impact UTIL-1. Development facilitated by the project would increase the demand on existing water, wastewater, electric power, natural gas, telecommunications, and stormwater drainage facilities. However, development facilitated by the project would occur in developed areas of the city where these facilities generally exist, and the expansion of existing facilities would not be necessary to accommodate development facilitated by the project. Water supplies would be sufficient to meet demand of development facilitated by the proposed project under normal, dry, and multiple dry year scenarios. Impacts would be less than significant.</p>	<p>None required</p>	<p>Less than significant</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact UTIL-2. Development facilitated by the project would increase the volume of solid waste generated in Cotati. However, local infrastructure serving the city has adequate capacity to accept the additional waste. Furthermore, the City of Cotati General Plan contains goals, objectives, and policies to increase recycling and comply with State and local management reduction regulations. Therefore, impacts would be less than significant.	None required	Less than significant

1 Introduction

This document is an Environmental Impact Report (EIR) for the proposed Santero Way Specific Plan (SWSP) update located on East Cotati Avenue and Santero Way in the City of Cotati, California. The proposed SWSP update (hereafter referred to as the “proposed project” or “project”) would create a transit-oriented neighborhood near the Cotati SMART Station, featuring mixed-use, neighborhood-serving retail, and community uses. The plan includes design standards and guidelines for future development, expands the plan boundary by up to 4 acres, and rezones parcels to require a minimum density of 25 dwelling units per acre and an average FAR of 1.0. The project also includes rezoning of 15 parcels located outside of the SWSP Plan Area that are subject to Transit-Oriented Community (TOC) development standards.

This section discusses (1) the project and EIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) the lead, responsible, and trustee agencies; and (5) the environmental review process required under the California Environmental Quality Act (CEQA). The proposed project is described in detail in Section 2, *Project Description*.

1.1 Environmental Impact Report Background

The City of Cotati distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on October 23, 2023, and ending on November 22, 2023. A Revised NOP describing changes to the project boundary to include the TOC parcels was circulated between July 19, 2024, and August 20, 2024. In addition, the City held an EIR Scoping Meeting on November 6, 2023, and on August 4, 2024. The meetings were aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members. The meetings were held at Cotati City Hall at 201 West Sierra Avenue. The City received letters from one agency and four members of the public in response to the NOP during the public review period, as well as various verbal comments during the EIR Scoping Meetings. Both NOPs are presented in Appendix A of this EIR, along with NOP comment letters received. Table 1-1 on the following page summarizes the content of the letters and verbal comments and where the issues raised are addressed in the EIR.

1.2 Purpose and Legal Authority

The proposed project requires the discretionary approval of the City of Cotati City Council; therefore, the project is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines* (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

This EIR has been prepared as a Program EIR pursuant to Section 15168 of the CEQA Guidelines. A Program EIR is appropriate for a series of actions that can be characterized as one large project and are somehow related.

This EIR is to serve as an informational document for the public and City of Cotati decision-makers. The process will include public hearings before the Planning Commission and City Council to consider certification of a Final EIR and approval of the proposed project.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request	How and Where It Was Addressed
Agency Comments		
Native American Heritage Commission (NAHC)	The commenter emphasizes the importance of early tribal consultation as mandated by Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18), outlining procedures for evaluating the impact on tribal cultural resources. The commenter provides recommendations for cultural resources assessments, including contacting the California Historical Research Information System (CHRIS), conducting archaeological surveys, and consulting with tribes to avoid or mitigate impacts on tribal cultural resources.	Comments are addressed in Section 4.4, <i>Cultural Resources</i> , and Section 4.14, <i>Tribal Cultural Resources</i> .
Individual Comments		
Kristin Boice	The commenter asks if 98 residential units and 5,500 square feet of office and retail space previously approved will be built. The commenter indicates that vacant parcels in the project area attract dumping of furniture and parked vans.	Development facilitated by the project is described in Section 2, <i>Project Description</i> . The commenter is describing an existing condition of the project area; existing conditions are described throughout Section 4, <i>Environmental Impact Analysis</i> , of this EIR as applicable to each resource area.
Gary Hoo	The commenter expresses concern related to the proposed number of housing units, congestion, site ingress/egress, and wildfire.	Impacts related to development facilitated by the project are addressed throughout Section 4, <i>Environmental Impact Analysis</i> , of the EIR. Congestion, or level of service, is no longer an issue required to be addressed under CEQA, and is not discussed in this EIR. However, impacts related to site ingress/egress, vehicle miles traveled (VMT), and wildfire are addressed in Section 4.13, <i>Transportation</i> , and Section 4.16, <i>Effects Found Not to be Significant</i> , respectively.
Zen Bellamy	The commenter expresses concerns related to parking, traffic congestion, construction traffic delays, and emergency vehicle access.	Congestion, or level of service, is no longer an issue required to be addressed under CEQA, and is not discussed in this EIR. Parking is also not considered to be an environmental impact for mixed-use residential development projects on infill sites within transit priority areas, such as the development facilitated by the project, pursuant to Public Resources Code Section 21099(d)(1). Impacts related to construction traffic, project related VMT, and emergency vehicle access are addressed in Section 4.13, <i>Transportation</i> .
Thomas Burkard	The commenter expresses concerns about future rezoning of 1015 East Cotati Avenue to modify the industrial zoning of the property.	Please refer to Section 2, <i>Project Description</i> , for a summary of the proposed zoning and land use changes of various parcels, including 1015 East Cotati Avenue. While the project proposes rezoning and land use designation changes, future development of properties within the project area would occur at the discretion of the associated landowner.

Commenter	Comment/Request	How and Where It Was Addressed
Scoping Hearing Comments		
November 6, 2023, Scoping Hearing	Commenters expressed a desire for community engagement, asked questions about the history of the project, and expressed concerns regarding parking.	Please refer to the draft Santero Way Specific Plan regarding community engagement efforts. Please refer to Section 2, <i>Project Description</i> , regarding the project background. Parking is also not considered to be an environmental impact for mixed-use residential development projects on infill sites within transit priority areas, such as the development facilitated by the project, pursuant to Public Resources Code Section 21099(d)(1).
August 5, 2024, Scoping Hearing	No comments were provided by members of the public or members of the Planning Commission.	No response is warranted.

1.3 Scope and Content

This EIR addresses all impacts enumerated in Appendix G of the *CEQA Guidelines*. The following issues were found to include potentially significant impacts and have been studied in detail in this EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Utilities and Service Systems

In addition, the following issues were found to have a less than significant impact or no impact, and are not discussed in detail in individual sections. Instead, the following sections are addressed in Section 4.15, *Effects Found Not to be Significant*:

- Agriculture and Forestry Resources
- Energy
- Mineral Resources
- Wildfire

In preparing the EIR, use was made of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References and Preparers*.

The alternatives section of the EIR (Section 6) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the “environmentally superior” alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required “No Project” alternative and three alternative development scenarios for the project area.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based. The *CEQA Guidelines* state:

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

1.4 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. The City of Cotati is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. There are no responsible agencies for the proposed project.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. The California Department of Fish and Wildlife is a trustee agency with regard to fish and wildlife of the state, designated rare and endangered native plants, game refuges, ecological preserves, and other areas administered by the department (*CEQA Guidelines* Section 15186[a]).

1.5 Environmental Review Process

The environmental impact review process, as required under CEQA, includes the following steps:

1. **Notice of Preparation (NOP).** After deciding that an EIR is required, the lead agency (City of Cotati) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092). The NOP must be posted in the County Clerk's office for 30 days.
2. **Draft EIR.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion (NOC) and Notice of Availability (NOA).** The lead agency must file an NOC and NOA with the State Clearinghouse when it completes a Draft EIR. The lead agency must place the NOA in the County Clerk's office for at least 30 days (Public Resources Code Section 21091) and send a copy of the NOA to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; or c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Section 21092.5). The minimum public review period for a Draft EIR is 30 days. When a project involves a state agency approval; or is of

statewide, regional, or areawide significance, the public review period must be 45 days (Public Resources Code 21091).

4. **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision (*CEQA Guidelines* Section 15093).
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (*CEQA Guidelines* Section 15097).
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094, Public Resources Code Sections 21108 and 21152). A local agency must file the NOD with the County Clerk, and a state agency, or project requiring state agency approval, must file the NOD with the State Clearinghouse. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

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2 Project Description

This section describes the proposed project, including the project applicant, the project area and surrounding land uses, major project characteristics, project objectives, and discretionary actions needed for approval.

2.1 Lead Agency Contact Person

Noah Housh, Director
City of Cotati
Community Development Department
201 West Sierra Avenue
Cotati, California 94931
(707) 665-3635

2.2 Project Location

The project is located within the city of Cotati in Sonoma County. The project area includes parcels fronting East Cotati Avenue and along Santero Way. The project area is irregularly shaped and includes parcels that are not contiguous with each other. The project area is relatively flat and is approximately 39 acres in total. The project area includes Assessor Parcel Numbers (APN) 046-051-037 (partial), 144-292-023 through -024, 144-301-008, 144-301-010, 144-302-022, 144-302-047 through -050, 144-310-006, 144-310-007 (partial), 144-320-008, 144-320-012, 144-320-018, 144-320-025 through -027, 144-320-033 through -036, 144-480-008, 144-480-014 through -017, 144-480-019, 144-480-021 through -022, 144-501-004, 144-570-001, 144-720-029, 144-720-040, 144-770-001 through -074, 144-790-001 through -016, and 144-790-COM.

The project area is a mix of vacant land and properties currently developed with primarily residential and commercial land uses. The Santero Way Specific Plan (SWSP) parcels (referred to herein as “SWSP Plan Area” or “SWSP parcels”) are developed with residential buildings, storage buildings, a parking lot serving the SMART Cotati Station, car wash, glass and mirror shop, or are currently vacant. The majority of the parcels outside of the SWSP Plan Area but also subject to Transit-Oriented Community (TOC) development standards (referred to herein as “TOC parcels”) are currently developed with commercial uses and associated parking lots, with one parcel developed with a single family residence, and a contiguous portion of two parcels being undeveloped.

The project area is regionally accessible from the U.S Route 101, and locally accessible from East Cotati Avenue. Figure 2-1 shows the regional location of the project area and Figure 2-2 shows the location of the project area in its neighborhood context. The project area is in an urban area, has been previously graded and developed, and is surrounded by roads and urban structures (primarily residential buildings, small commercial buildings, and parks).

Figure 2-1 Regional Location



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Fig. 2 Regional Location

 Project Location

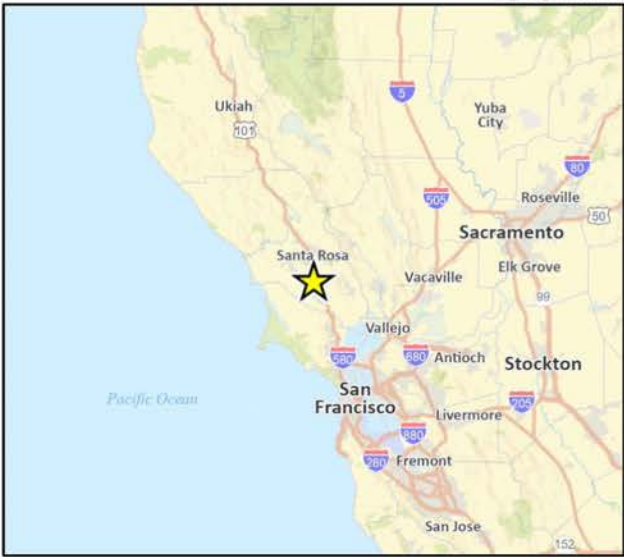
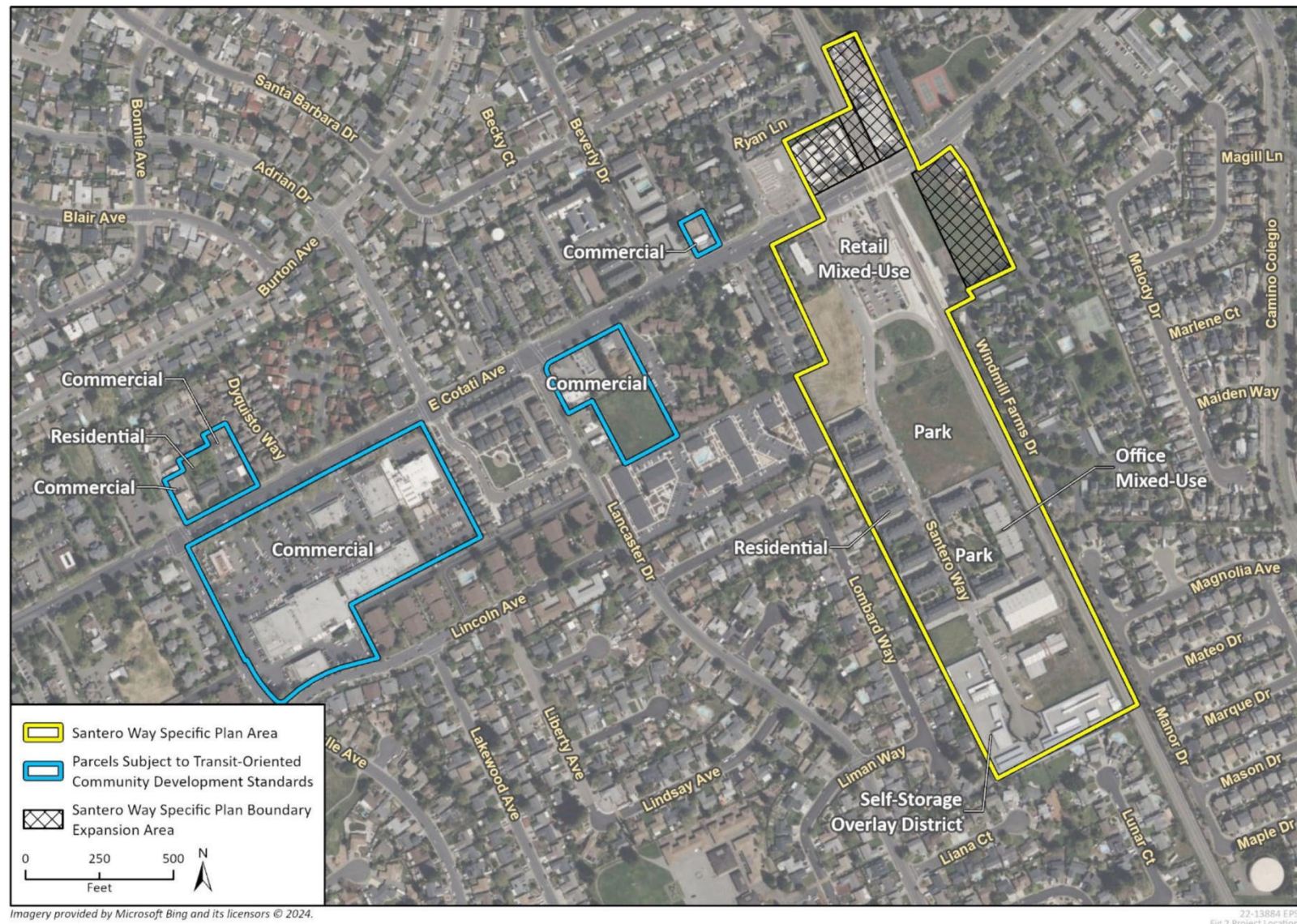


Figure 2-2 Project Site Location



2.3 Existing Site Characteristics

2.3.1 Current Land Use Designation and Zoning

The SWSP parcels are either vacant or currently partially developed with residential buildings, storage facilities, warehouses and manufacturing facilities, a car wash, and a parking lot for the SMART station. The TOC parcels are currently developed with commercial uses, with the exception of one parcel that is currently developed with a single family residence.

The project area has a General Plan land use designation of Specific Plan (SP), General Commercial (GC), and High Density Residential (HDR). The SP land use allows for retail mixed-use, office mixed-use, parks, and residential uses within the existing SWSP area. The GC land use allows for the development of basic business and service needs of the local community, including shopping centers, neighborhood-oriented retail, and highway-oriented commercial uses. The GC land use also allows for office and multi-family residential land uses up to 15 dwelling units per acre, with a site coverage of 100 percent. The HDR land use permits development up to 15 dwelling units per acre, with site coverage up to 75 percent.

The project area is zoned SW (Santero Way), CE (Commercial, East Cotati Corridor), NL (Neighborhood, Low Density), and NM (Neighborhood, Medium Density), as defined by the City's Zoning Ordinance and the Land Use Element of the General Plan. Uses permitted in the SW Zone include retail mixed-use, office mixed-use, parks, and residential uses. The CE Zone allows for the development of between 12 and 15 dwelling units per acre; various commercial, retail, and office-type uses; libraries and museums; parks; lodging; and various accessory uses. The NL Zone allows for the development of between 4 and 6 dwelling units per acre. The NM Zone allows for the development of between 8 and 10 dwelling units per acre.

2.3.2 Surrounding Land Uses

The SWSP parcels are bordered by both single family and multi-family residences on all sides, with Sunflower Park located to the north. The TOC parcels are generally surrounded by residential development, with commercial uses located at the northwest and southwest corners of the East Cotati Avenue and Lasalle Avenue intersection, and Kotate Park at the southwest corner of the Lasalle Avenue and Lincoln Avenue intersection. Many of the properties surrounding both the SWSP parcels and the TOC parcels are in the neighboring jurisdiction, the City of Rohnert Park.

2.4 Background

The Santero Way Specific Plan (SWSP) was adopted in August 2001, and originally envisioned a mixed-use office neighborhood, adjacent to the SMART rail station. The primary objective of the original SWSP was to increase the number of residents and employees within walking distance (0.5 mile) of the SMART station. Specifically, the original SWSP envisioned the development of 198 new dwelling units, 339,200 square feet of office and institutional uses, 68,000 square feet of retail uses, and 57,000 square feet of supporting parkland/open space (City of Cotati 2024).

Since the adoption of the SWSP, approximately 100 homes and 15,000 square feet of live-work spaces have been constructed, with an additional 98 residential units and 5,500 square feet of office and retail uses approved for development (City of Cotati 2024). While the lack of the SWSP full buildout over its 20-year life can partly be attributed to market forces, feedback has indicated that

the SWSP is too prescriptive in terms of development standards (such as design type and building height) and too reliant on commercial square footage, given the economic changes since adoption.

In response to the stalled redevelopment in this part of the city and to help meet local housing needs, the City has proposed to update the SWSP to increase the quantity of residential development in place of the office and institutional square footage currently identified in the plan. Essentially, the goal would be to pivot the SWSP from an office-focused, mixed-use development to a residentially focused, transit-oriented neighborhood that also allows for mixed-use and neighborhood-serving retail development.

2.5 Project Characteristics

The SWSP Update (proposed project) is an update to existing land use designations to support a vision of a residentially-focused transit-oriented neighborhood. The SWSP would encourage development within walking distance of the Cotati SMART Station and would allow for mixed-use and neighborhood-serving retail and “maker” type light industrial development, community-serving uses, and transit-serving uses. The SWSP would revise the designated land uses through updated design standards and guidelines and a planning framework to facilitate and guide future development.

The proposed project also includes:

1. Expansion of the SWSP Plan Area to add up to four parcels encompassing up to 4 acres;
2. Rezoning of up to nine parcels up to 15 acres located outside the SWSP Plan Area but within 0.5 mile of the Cotati SMART Station; and
3. The establishment of development standards and design guidelines to ensure compatibility with existing land uses and project objectives.

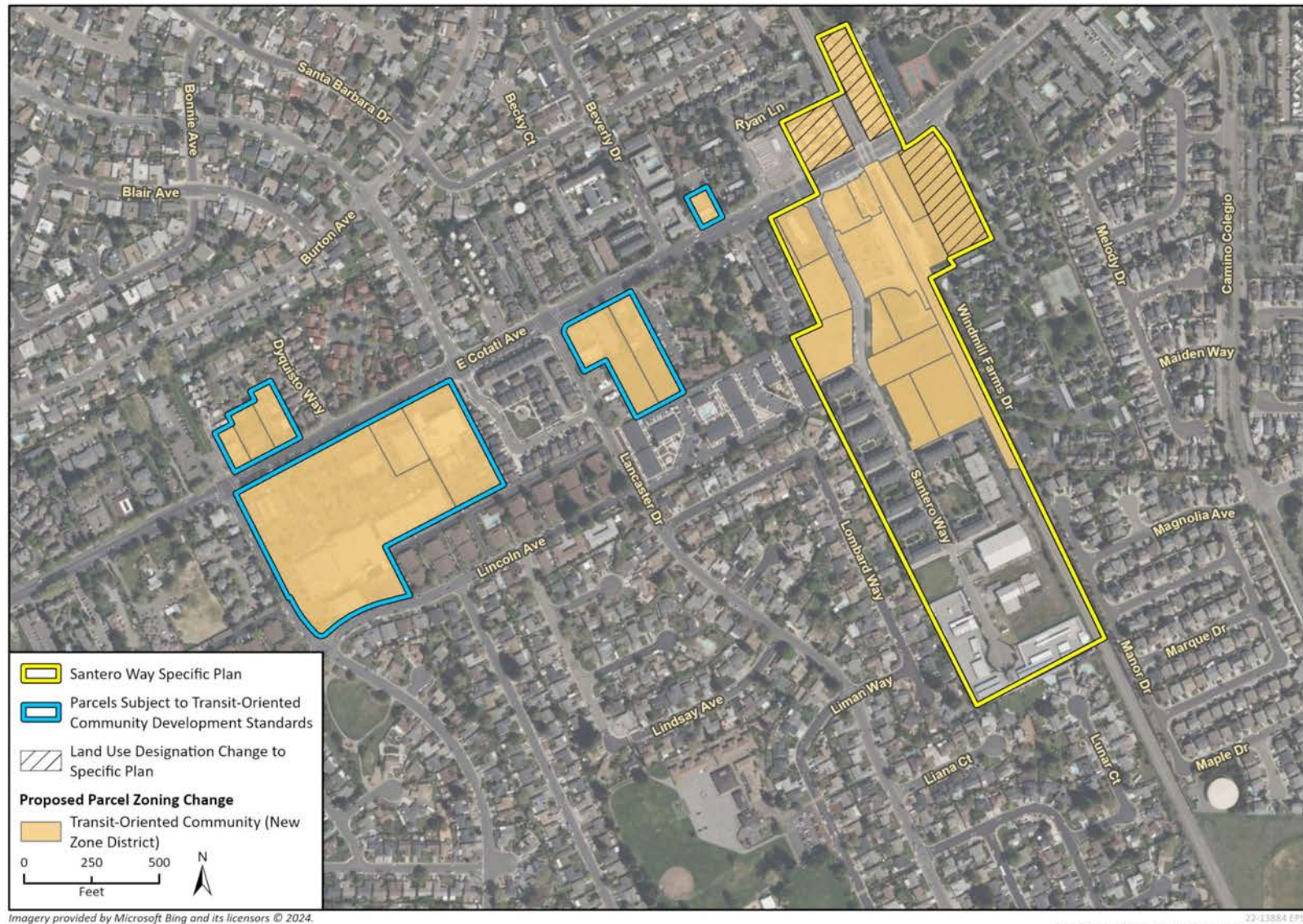
The project would result in the rezoning, land use designation change, and/or change to allowable development under the SWSP to allow between 25 and 35 dwelling units per acre, and a floor area ratio (FAR) of at least 1.0 for commercial development. A total of 27 parcels would be rezoned and a total of 3 parcels would undergo a land use designation change. These parcels are shown in Figure 2-3.

2.5.1 Santero Way Specific Plan Update

The SWSP Update would revise the development standards and update design standards for the Plan Area, which would be accomplished through adoption of an updated Specific Plan. The SWSP would also include an evaluation of the impact on utilities and infrastructure in the area; changes to development standards including residential density, building heights, number of building stories, and allowed uses; and parking requirements.

The project would also add three additional parcels to the SWSP Plan Area, in addition to a portion of one parcel containing the SMART rail line. These parcels are located adjacent to the northern portion of the SWSP Plan Area, along East Cotati Avenue and adjacent to the SMART rail line, as shown in Figure 2-3.

Figure 2-3 Proposed Zoning and Land Use Designation Changes



Within the SWSP area, 24 parcels are identified as potential sites subject to the proposed SWSP allowed land use change to allow between 25 and 35 dwelling units per acre, and a floor area ratio (FAR) of at least 1.0 for commercial development. New development projects, including redevelopment of existing parcels, would be required to comply with new objective design standards (described in more detail below). Table 2-1 lists the SWSP Plan Area parcels and presents the land use designation changes with associated new allowable densities, the size of each parcel, and the number of realistic potential units that could be accommodated on each parcel. The development potential presented in this table reflects the anticipated level of future development as determined by the City. As shown in Table 2-1, a maximum of 535 dwelling units and 543,759 square feet of non-residential commercial land uses would be developed within the SWSP Plan Area.

The SWSP Update includes the following guiding principles:

- Housing
 - Develop Affordable, Multifamily, and Workforce Housing
 - Adopt Plan Area Design & Development Standards
- Transportation and Connectivity
 - Improve Multimodal Connections
 - Improve SMART Station Access
 - Support Bicycle & Vehicle Parking for New & Existing Land Uses
- Economy
 - Support A Mix of Commercial Uses
 - Incentivize Mixed-Use Development
- Transit-Oriented Community Policy Implementation
 - Rezone Land for Transit-Oriented Development
 - Promote Housing Production, Preservation, and Protection

The SWSP Update also proposes an internal emergency vehicle access connection between Breen Way and Santero Way, across APN 144-302-048. The SWSP Update specifies street and drive aisle lane widths, includes internal bicycle and pedestrian pathways, specifies development standards in the proposed zoning districts, and identifies if infrastructure improvements are necessary in the SWSP area. Necessary infrastructure upgrades are discussed in more detail in Section 2.5.5, *Utility Upgrades*.

2.5.2 Transit-Oriented Communities Standards

The City of Cotati is a member of the Metropolitan Transportation Commission (MTC), a multi-jurisdictional planning agency representing all cities, towns, and counties within the nine-county Bay Area. Recent policy development on the regional level has included new development standards for Plan Areas within Transit-Oriented Communities (TOC). TOC policies will apply within 0.5 mile of major transit stops, and major funding for local infrastructure projects is conditioned on TOC compliance. Among other requirements, land uses within the 0.5-mile TOC Station Areas need to have an allowable residential density of 25 to 35 units per acre throughout the 0.5-mile area surrounding the Station. This requirement applies to the Cotati SMART Station.

Table 2-1 SWSP Area Development Estimates (Net Increase over Existing)

APN	Location	Acreage	Zone Change?	Land Use Change?	Proposed du/ac	Anticipated Level of New Residential Development (Units) ¹	Anticipated Level of New Commercial Development (sf) ¹	Population Estimate ²
144-301-008	955 East Cotati Avenue	0.96	Yes; from CE (15 units/acre) to TOC	Yes; from GC to SP	25-35 (30 average)	29	18,518	67
144-302-047	930 East Cotati Avenue	0.57	Yes; from SWSP to TOC	No	25-35 (30 average)	17	17,199	40
144-302-048	0 Santero Way	0.78	Yes; from SWSP to TOC	No	25-35 (30 average)	23	27,181	55
144-302-049	924 East Cotati Avenue	0.25	Yes; from SWSP to TOC	No	n/a; existing residential uses	0	0	0
144-310-006	1015 East Cotati Avenue	1.07	Yes; from CE (15 units/acre) to TOC	Yes; from GC to SP	25-35 (30 average)	32	20,686	75
144-320-008	982 East Cotati Avenue	0.41	Yes; from SWSP to TOC	No	25-35 (30 average)	12	14,288	29
144-320-012	1038 East Cotati Avenue	1.74	Yes; from NL (6 units/acre) to TOC	Yes; from GC to SP	25-35 (30 average)	51	60,636	120
144-320-018	980 East Cotati Avenue	3.39	Yes (northern portion of parcel); from SWSP to TOC	No	n/a; railroad right-of-way	0	0	0
144-320-025	970 East Cotati Avenue	0.28	Yes; from SWSP to TOC	No	25-35 (30 average)	8	5,055	20
144-320-026	0 East Cotati Avenue	0.42	Yes; from SWSP to TOC	No	25-35 (30 average)	13	14,636	29
144-320-027	6050 Santero Way	1.33	Yes; from SWSP to TOC	No	25-35 (30 average)	40	46,348	93
144-320-029	0 East Cotati Avenue	0.07	Yes; from SWSP to TOC	No	n/a; roadway right-of-way	0	0	0
144-320-033	0 None	0.56	Yes; from SWSP to TOC	No	25-35 (30 average)	17	19,515	39
144-320-034	0 None	1.07	Yes; from SWSP to TOC	No	25-35 (30 average)	32	37,287	75
144-320-035	0 None	0.81	Yes; from SWSP to TOC	No	25-35 (30 average)	24	28,227	57
144-320-036	0 None	0.62	Yes; from SWSP to TOC	No	25-35 (30 average)	19	21,606	44
144-480-008	8354 Santero Way	1.11	No	No	25-35 (30 average)	33	5,384	78

APN	Location	Acreage	Zone Change?	Land Use Change?	Proposed du/ac	Anticipated Level of New Residential Development (Units) ¹	Anticipated Level of New Commercial Development (sf) ¹	Population Estimate ²
144-480-014	8360 Santero Way	1.87	No	No	25-35 (30 average)	56	33,617	131
144-480-015	0 Santero Way	1.07	No	No	25-35 (30 average)	32	5,769	75
144-480-016	8364 Santero Way	0.37	No	No	25-35 (30 average)	11	2,189	26
144-480-017	0 Santero Way	1.06	No	No	25-35 (30 average)	32	23,087	74
144-480-019	0 Santero Way	0.51	No	No	25-35 (30 average)	15	11,108	36
144-480-021	0 Santero Way	0.87	Yes; from SWSP to TOC	No	25-35 (30 average)	26	30,318	61
144-480-022	0 None	0.37	Yes; from SWSP to TOC	No	25-35 (30 average)	11	12,894	26
Total³		18.10				535	459,076	1,251

du/ac = dwelling units per acre; sf = square feet; CE = Commercial, East Cotati Corridor; TOC = Transit-Oriented Community (new zone district); SWSP = Santero Way Specific Plan; GC = General Commercial; SP = Specific Plan

¹ These columns provide the net increase in residential and commercial development (proposed project minus existing conditions) on each parcel that was identified to have development potential.

² Population estimates were calculated using the California Department of Finance persons per household estimate of 2.34 (DOF 2024).

³ Numbers may not add up due to rounding.

The SWSP Plan Area lies entirely within the 0.5-mile radius of the TOC Station Area (shown in Figure 2-4), which extends beyond the boundaries of both the SWSP area and the Cotati City limits. The project would rezone the TOC parcels that are outside the SWSP Plan Area to comply with the requirements set forth by MTC/ABAG.

MTC/Association of Bay Area Governments (ABAG) has established requirements for both residential and commercial developments within TOC Areas. The requirements include both density minimums for residential developments, and minimum floor area ratios for non-residential developments. Within the TOC Area in the City of Cotati, nine parcels are identified as sites for rezoning to allow between 25 and 35 dwelling units per acre, and a FAR of at least 1.0 for commercial development. TOC parcels within the SWSP Plan Area would be subject to SWSP residential design standards, and TOC parcels outside the SWSP Plan Area will be subject to the City's existing design standards. Table 2-2 lists the TOC parcels and presents the zoning changes with associated new allowable densities, the size of the site, and the number of realistic potential units that could be accommodated on each site. The development presented in this table reflects the anticipated level of development as determined by the City. As shown in Table 2-2, the TOC parcels are expected to accommodate 235 dwelling units and approximately 192,289 square feet of commercial development.

Table 2-2 TOC Parcel Development Estimates (Net Increase over Existing)

APN	Location	Acreage	Zone Change?	Land Use Change?	Proposed du/ac	Anticipated Level of New Residential Development (Units) ¹	Anticipated Level of New Commercial Development (sf) ¹	Population Estimate ²
144-292-023	640 East Cotati Avenue	0.72	Yes; from CE (15 units/acre) to TOC	No	25-35 (30 average)	9	1,490	20
144-292-024	680 East Cotati Avenue	2	Yes; from CE (15 units/acre) to TOC	No	25-35 (30 average)	24	21,780	56
144-301-010	905 East Cotati Avenue	0.25	Yes; from CE (15 units/acre) to TOC	No	25-35 (30 average)	8	6,318	18
144-302-022	768 East Cotati Avenue	0.97	Yes; from CE/NM (12 units/acre) to TOC	No	25-35 (30 average)	29	19,543	68
144-302-050	766 East Cotati Avenue	1.32	Yes; from CE/NM (12 units/acre) to TOC	No	25-35 (30 average)	40	20,686	93
144-501-004	556 East Cotati Avenue	7.82	Yes; from CE (15 units/acre) to TOC	No	25-35 (30 average)	94	93,694	220
144-570-001	475 East Cotati Avenue	0.28	Yes; from CE (15 units/acre) to TOC	No	25-35 (30 average)	3	0	8
144-720-029	501 East Cotati Avenue	0.46	Yes; from CE (15 units/acre) to TOC	No	25-35 (30 average)	13	16,030	30
144-720-040	525 East Cotati Avenue	0.53	Yes; from CE (15 units/acre) to TOC	No	25-35 (30 average)	16	12,749	37
Total³		13.99				235	192,289	549

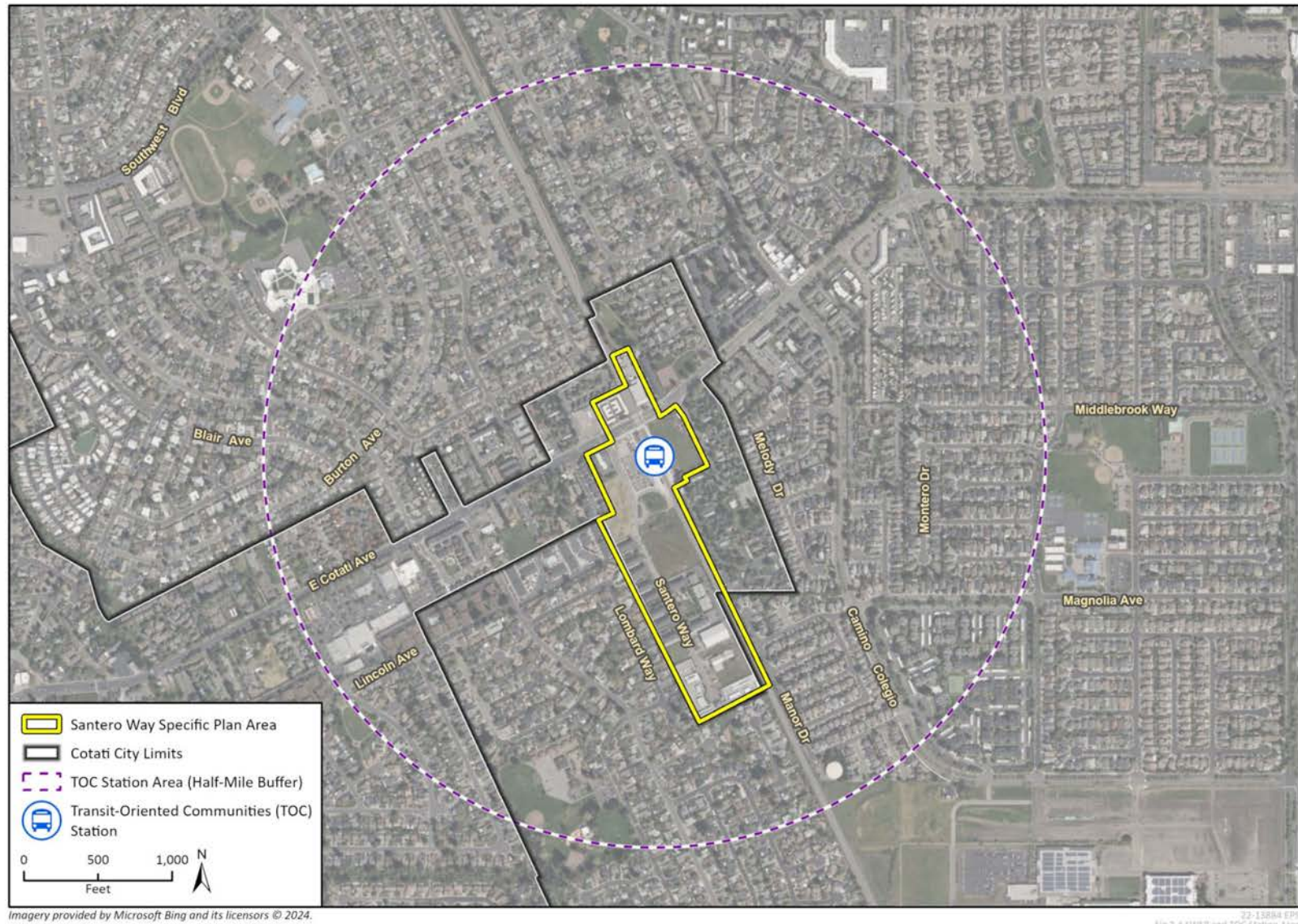
du/ac = dwelling unit per acre; sf = square feet; CE = Commercial, East Cotati Corridor; TOC = Transit-Oriented Community (new zone district); NM = Neighborhood, Medium Density

¹ These columns provide the net increase in residential and commercial development (proposed project minus existing conditions) on each parcel.

² Population estimates were calculated using the California Department of Finance persons per household estimate of 2.34 (DOF 2024).

³ Numbers may not add up due to rounding

Figure 2-4 TOC Station Area



2.5.3 Objective Design Standards

As a part of the proposed zoning changes, objective design standards regulating aesthetics (architectural style, building proportions, building types, civic spaces, etc.) would be adopted for the SWSP area. The TOC parcels (outside the SWSP Plan Area) will be subject to the City's existing design standards. The City maintains Objective Design Standards that apply to all multi-family residential projects; development facilitated by the project would be subject to these standards amended to accommodate the unique character and setting of the SWSP parcels. The project would amend the existing Objective Design Standards (Cotati Municipal Code Section 17.39.030) as follows, to provide greater flexibility on style without compromising building quality in the project area:

- **Design Features 17.39.030(B)(1):** The SWSP area design will be inclusive of “traditional design features of craftsman homes,” as required citywide, but a greater variety of contemporary design styles will be allowed on parcels fronting East Cotati Avenue.
- **Roof Standards 17.39.030(B)(1)(a):** Flat roofs will be allowed in the SWSP area for structures of three or more stories, in the instance of a rooftop terraces incorporated as public or private open space. Rooftop terraces shall be accessible to residents or customers, as applicable, within hours compliant with the City's Noise Ordinance.
- **Window Surrounds 17.39.030(B)(1)(d):** Metal window surrounds allowed in the same manner as wood.
- **Exterior Wall Materials 17.39.030(B)(1)(f):** Allowable materials amended for parcels along East Cotati Avenue to include high performance, LEED-certified façades including aluminum, glass, steel, concrete, and composite.
- **Ground-Level Porches 17.39.030(B)(1)(h):** Private open space fronting plazas, parks or courtyards will still be required, but would not be required to be the unit's primary entrance. Ground-level units fronting onto East Cotati Avenue are not required to provide porches. Cantilevered roofs are allowed on porches.
- **Façade Articulation 17.39.030(B)(7):** Not required on elevations fronting East Cotati Avenue.
- **Roofline Articulation 17.39.030(C)(3):** Not required in SWSP area for projects three stories or greater.
- **Amenities 17.39.030(D)(1)(c):** List of additional usable open space amenities expanded for SWSP area to include commercial use offering food (restaurant, café, or market). A commercial food operation may count as two amenities.
- **Screened Parking 17.39.030(F)(4):** Amended to prohibit surface parking lots fronting onto East Cotati Avenue or Santero Way. Tuck-under or screened ground floor parking accessed from the right-of-way is allowed and encouraged, as is parking situated behind the primary structure.

2.5.4 Anticipated Total Growth and Development

The SWSP envisions the development of additional housing that, if built, would result in an increase in population within the City of Cotati. As shown in Table 2-1, a maximum of 535 dwelling units and 459,076 square feet of non-residential commercial land uses would be developed within the SWSP Area. As shown in Table 2-2, within the TOC Area, a maximum of 235 dwelling units would be developed along with approximately 192,289 square feet of non-residential commercial. As shown below in Table 2-3, the project would result in a net increase of 769 residential units, 651,365 square feet of commercial development, and approximately 1,800 residents, as compared to existing conditions in the project area.

Table 2-3 Project Development Projections

	Residential (Multi-Family)	Commercial	Population Estimate ¹
SWSP Area	535 units	459,076 sf	1,251
TOC Parcels	235 units	192,289 sf	549
Total	769 units	651,365 sf	1,800

sf = square feet

¹ Population estimates were calculated using the California Department of Finance (DOF) estimate of 2.34 persons per household for 2024 (DOF 2024).

2.5.5 Utility Upgrades

Based on a preliminary water and wastewater infrastructure capacity review, it is anticipated that the sewer pipeline located within Santero Way, within the SWSP area of the proposed project, will require upsizing from 6-inch diameter pipe to 8- or 10-inch diameter pipe. This will be necessary to meet minimum pipe diameter and capacity constraints. No other utility upgrades to the water or wastewater systems are anticipated to be necessary.

2.6 Project Objectives

- Increase opportunities for residential development by identifying suitable areas and ensuring compliance with zoning and environmental standards.
- Promote smaller-scale commercial development by encouraging diverse commercial districts that contribute to the City’s identity, culture, and economy, provide jobs, and generate revenue for the City.
- Support mixed-use development to serve community needs by integrating residential, “maker” scale light industrial, commercial, and community spaces, and enhancing neighborhood vibrancy and walkability.
- Expand community spaces and amenities by developing public spaces, renovating existing facilities, and engaging residents in planning priorities.
- Meet Transit-Oriented Communities (TOC) requirements for station areas by developing guidelines, enhancing accessibility, and integrating sustainable design practices into transit-oriented development projects.

2.7 Required Approvals

The City of Cotati City Council would need to take the following discretionary actions:

- Certification of the EIR prepared for the SWSP Update and Rezoning of TOC parcels to a new TOC Zoning District
- Approval of a Specific Plan Amendment for the SWSP Update
- Approval of rezoning the TOC parcels and select SWSP parcels

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The project area is located in central Sonoma County in the San Francisco Bay Area. The project area is located in the City of Cotati, adjacent to the City of Rohnert Park and approximately eight miles south of the City of Santa Rosa. The City of Cotati is located approximately 22 miles inland from the coastline of the Pacific Ocean. Figure 2-1 in Section 2, *Project Description*, shows the location of the project area in the region. The topography of the region is varied, including several mountain ranges, distinctive valleys, and coastal terraces. The project area is located in the central portion of a wide valley extending from Healdsburg to the San Pablo Bay. The City of Cotati and project area are just south of the Russian River Valley, which encompasses the northern portion of the larger valley. The region is bounded on the south by San Pablo Bay and associated wetlands. Rolling hills and grasslands predominate the landscape in the valleys, which are geographically separated from northern counties such as Lake and Napa Counties by the Mayacamas and Sonoma Mountains.

The closest freeway to the project area is U.S. Route 101 (US 101), located more than one mile west of the project area. US 101 is a north-south highway providing connections throughout the valley, from Cloverdale to Petaluma within Sonoma County. The project area can also be accessed via the Sonoma-Marin Area Rail Transit (SMART) Cotati Station. There are bus stations located along East Cotati Avenue in proximity to the project area as well.

Cotati is characterized by a typical Mediterranean climate, generally dry in the summer with mild, wet winters. Average summer temperatures in degrees Fahrenheit are in the low 80s and average winter temperatures are in the mid-50s. The warmest month of the year is August with an average maximum temperature of 82 degrees, while the coldest month is December, with an average minimum temperature of 38 degrees. Most rainfall occurs between October and April, with an average rainfall of 5.4 inches during February, the wettest month (Weather Spark 2024).

3.2 Project Site Setting

As shown in Figure 2-2 in Section 2, *Project Description*, the project area is bordered by residential and commercial development, with the SMART rail crossing through the eastern portion of the project area. The project area is located on the eastern part of the city of Cotati, adjacent to the city of Rohnert Park. Several parcels within the project area are currently developed with residential buildings, commercial facilities, storage facilities, and parking lots, with the remainder of the parcels undeveloped. The project area has a General Plan land use designation of Specific Plan (SP), General Commercial (GC), and High Density Residential (HDR) as defined by the Land Use Element of the General Plan. The project area is zoned SW (Santero Way), CE (Commercial, East Cotati Corridor), NL (Neighborhood, Low Density), and NM (Neighborhood, Medium Density) as defined by the City's Zoning Ordinance. The project area can be accessed via East Cotati Avenue and Santero Way. The nearest creek to the project area is the Laguna de Santa Rosa, which crosses under East Cotati Avenue approximately 1,000 feet west of the closest TOC parcel.

3.3 Cumulative Development

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of a proposed project. CEQA defines “cumulative impacts” as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, construction noise impacts of two nearby projects may be less than significant when analyzed separately, but could have a significant impact when analyzed together. The cumulative impact analysis provides a reasonable forecast of future environmental conditions and gauges the effects of a series of projects.

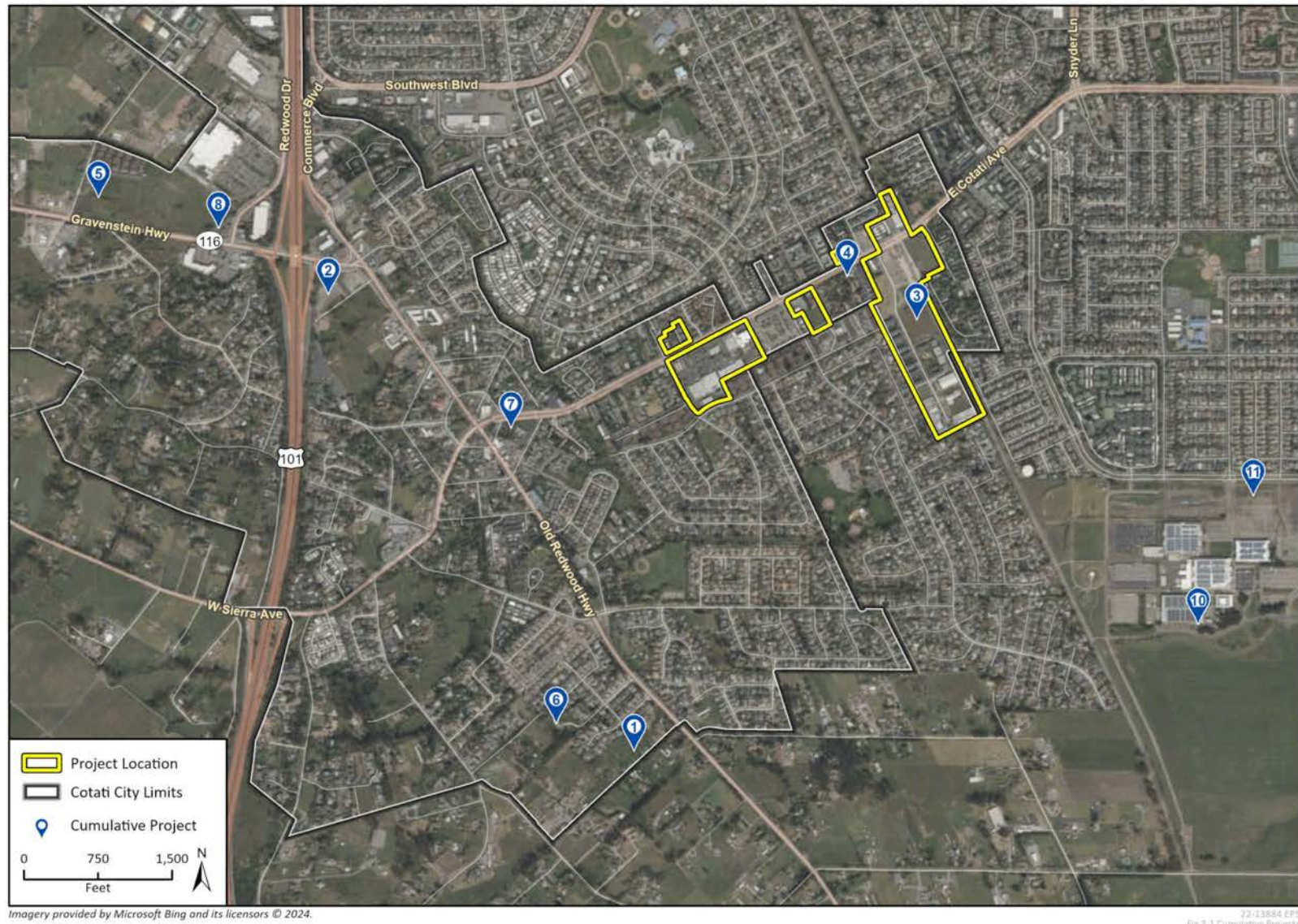
CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Currently planned and pending projects in Cotati and surrounding areas, within approximately one mile of the project area, including the City of Rohnert Park, are listed in Table 3-1 and their locations are shown in Figure 3-1. These projects are considered in the cumulative analyses provided in Section 4, *Environmental Impact Analysis*.

Table 3-1 Cumulative Projects List

Project No.	Project Title	Project Location	Project Details	Project Status
City of Cotati				
1	Pink Viking	8841 Old Redwood Highway	43 single-family residential units	Under Review
2	Cotati Hotel and Market	147 St. Joseph Way	153-room hotel, 5,650-square feet (sf) retail and restaurant	Under Construction
3	Cotati Station	South of the SMART Station parking lot on Santero Way, within the SWSP area	98 apartment units, 8,000 sf commercial and retail space	Approved
4	902 East Cotati Avenue Estates	902 East Cotati Avenue	4 residential units and 2 accessory dwelling units (ADU)	Building Permit ready to issue
5	Cotati Village	Northeast Corner of Alder Lane and Highway 116	177 residential units and 29,415 sf commercial space	Approved
6	Lasker Lane Subdivision	65 Lasker Lane	12 single-family residential units, 24 ADUs and junior ADUs	Under Review
7	La Plaza View Mixed Use	120 East Cotati Avenue	52 residential units, 5,000 sf commercial space, and parking	Pending Application
8	Redwood Row	Northwest corner of Redwood Drive and Highway 116	170 residential units and 141,500 sf commercial shopkeeper spaces	Under Review
9	Cotati Village 2	7515 Alder Avenue	126 residential units and 7,822 sf commercial space	Pending Approval
City of Rohnert Park				
10	Resynergi Rohnert Park	1200 Valley House Drive	Processing facility	Under Review
11	SOMO Planned Development Tentative Map Phase 1N-B	SOMO Village	25 residential lots	Under Review

Source: City of Cotati 2024; City of Rohnert Park 2024

Figure 3-1 Cumulative Project Locations



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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the Santero Way Specific Plan Update Project for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A “significant effect” as defined by the *CEQA Guidelines* §15382:

...means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the “significance thresholds,” which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*.

The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the proposed project.

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4.1 Aesthetics

This section evaluates the proposed project for potential impacts on aesthetics, including scenic vistas, scenic resources, visual character and quality, and light and glare.

4.1.1 Setting

a. Existing Visual Conditions

The project area includes parcels fronting East Cotati Avenue and along Santero Way. The project parcels are currently either vacant or are developed with primarily residential and commercial land uses. The project area is surrounded by roads and urban structures (primarily residential buildings, small commercial buildings, and parks). The existing visual condition of the project area is provided in Figure 4.1-1 and Figure 4.1-2.

As shown in Figure 4.1-1, Photographs 1 and 2, most of the parcels subject to Transit-Oriented Community (TOC) development standards (TOC parcels) are currently developed with commercial uses and associated parking lots. One TOC parcel is currently developed with a single-family residence, and a contiguous portion of two TOC parcels remains undeveloped. East Cotati Avenue is a main thoroughfare, generally containing five traffic lanes, and is lined with mature trees and sidewalks on either side.

As shown in Figure 4.1-2, Photographs 1 through 4, the Santero Way Specific Plan (SWSP) parcels are developed with residential buildings, storage buildings, a parking lot serving the Sonoma-Marín Area Rail Transit (SMART) Cotati Station, car wash, glass and mirror shop, or remain vacant. Starting at East Cotati Avenue, Santero Way is a two-lane street lined with streetlamps and terminates into a cul-de-sac. On the street corner, the car wash, parking lot, and vacant parcels transition into a residential neighborhood. Rows of mature trees and landscaped sidewalks are maintained where the road abuts two- to three-story residential development. Cars line Santero Way on both sides due to street parking provided in front of nearby residences. Toward the southern extent of Santero Way, residential development gives way to vacant lots, storage buildings, and other commercial structures.

Figure 4.1-1 Transit-Oriented Community Development Parcels



Photograph 1. Looking west toward commercial development along East Cotati Avenue.
Source: Google Earth 2024



Photograph 2. Looking east towards a TOC parcel from East Cotati Avenue and Lancaster Drive intersection.
Source: Google Earth 2024

Figure 4.1-2 Santero Way Specific Plan Parcels



Photograph 1. Looking east toward SMART Station from the corner of East Cotati Avenue and Santero Way intersection.

Source: Google Maps 2024



Photograph 2. Looking east toward vacant and residential parcels from Santero Way.

Source: Google Maps 2024



Photograph 3. Residential development, looking southeast along Santero Way.
Source: Google Earth 2024



Photograph 4. Looking northwest near the cul-de-sac terminus of Santero Way.
Source: Google Earth 2024

b. Scenic Resources

While the City of Cotati does not provide a specific definition of “scenic resources”, most communities identify local scenic resources as important visual assets that contribute to community identity. These resources can include landforms, trees, water features, and the built environment as far as they enhance and define the visual character of a landscape. Scenic resources include natural and open spaces, as well as the built environment, particularly if certain architecture is of historic or artistic value. Scenic resources identified by the City of Cotati include the Sonoma Mountains, Laguna de Santa Rosa, and local hills, ridgelines, and open space areas surrounding the City (City of Cotati 2015). However, views of these scenic resources from the project area are largely obscured by intervening features (i.e. distance, topography, existing development and vegetation).

Scenic Vistas

A scenic vista is a view from a public place (roadway, designated scenic viewing spot, etc.) that is expansive and considered important. It can be obtained from an elevated position (such as from a public trail on the top of a hillside) or it can be seen from a roadway with a longer-range view of the landscape.

The California Department of Transportation (Caltrans) maintains an inventory of approximately 146 scenic vista points throughout the state highway system as places where motorists can safely view scenery or park and relax (Caltrans 2023). However, the nearest vista point is located more than 19 miles away from the project area at Sonoma Creek Vista Point in northern San Pablo Bay. There are no State-designated scenic vistas in proximity to the project area (Caltrans 2024a).

c. Scenic Corridors

Scenic corridors provide an opportunity for the public to take advantage of the natural environment’s aesthetic value. Scenic corridors typically pertain to roadways and visible lands outside the roadway right-of-way. California’s Scenic Highway Program designates scenic highways with the intention of protecting their corridors from change that would diminish the aesthetic value of adjacent lands. There are no State-designated scenic highways in the project area; the nearest eligible State scenic highway is State Route (SR) 116, located approximately 0.75 mile from the nearest portion of the project area (Caltrans 2019). Locally, the County of Sonoma has designated Petaluma Hill Road as a scenic corridor, which is located approximately 1.25 mile from the project area.

d. Visual Character

The City of Cotati is located north of Petaluma and south of Rohnert Park. The project area is located in the central portion of a wide valley extending from Healdsburg to San Pablo Bay. The City of Cotati and project area are just south of the Russian River Valley, which encompasses the northern part of the larger valley. The region is bordered by the Sonoma Mountains to the east, and a series of low hills to the west. The agricultural and natural open space areas to the south and west of Cotati provide a visual break from Petaluma to the south and Sebastopol to the west.

According to the City, Cotati has established itself as the "Hub" of Sonoma County and is largely defined by its small-town atmosphere, which combines rural character and a vibrant blend of urban amenities. The community is showcased by its hexagonal central plaza and street layout (located approximately 0.25 mile west of the nearest project parcel) that was designed in the 1890s by Newton Smyth as an alternative to the traditional grid layout. This design is one of only two

hexagonal town layouts in the United States and is designated as a California Historical Landmark (Number 879). The hexagonal plaza serves as the center of the community and is followed by concentric zones of urban development. There is a general progression outward of decreasing development and increasing vegetative cover. (City of Cotati 2015).

The project area along East Cotati Avenue, including the TOC parcels, is largely developed with commercial and residential uses of varying sizes, colors, and styles (Figure 4.1-1, Photographs 1 and 2). The maintenance of landscaped areas along East Cotati Avenue, particularly near commercial frontages, provides a feeling of openness and integration of development with the landscape (Figure 4.1-1, Photograph 1). The regularly spaced rows of mature trees along the street create a visual corridor that is relatively cohesive and feels established and intentional.

As shown in Figure 4.1-2, Photographs 1 through 4, the SWSP parcels are partially developed with residential and commercial uses with intermittent vacant parcels providing breaks in development. Near the Cotati SMART Station parking area, the flat parking area and structures set back from the street provide a feeling of openness along Santero Way (Figure 4.1-2, Photograph 1). The transition from vacant open space to two- to three-story residential development with associated, mature street trees and landscaping creates the sense of an established neighborhood as compared to the transit-oriented development (e.g. parking lot, car wash, SMART Station) at the corner (Figure 4.1-2, Photograph 2). The combination of the rows of tall trees on either side of the street and the narrow setback between the street and the high-density residences attributes to a visually linear and consistent atmosphere (Figure 4.1-2, Photograph 3). There is a sharp contrast between the residential area and the commercial area toward the end of Santero Way. The buildings transition from warm-toned, stucco-finished residences with varied eaves and rooflines to large, basic-shaped buildings clad with metal paneling (Figure 4.1-2, Photograph 4). The road width becomes irregular, and ruderal weeds fill the landscape between the buildings and street along the east side of Santero Way. At the end of the cul-de-sac, mature coniferous trees line Santero Way to screen views in front of a storage facility. This end of the street feels less intentional, and industrial in character (Figure 4.1-2, Photograph 4).

A large parking area, electric vehicle charging station, and bus stop are located at the SMART station. As shown in Figure 4.1-2, Photograph 1, existing development on the SWSP parcels adjacent to the SMART railway line and its intersection with East Cotati Avenue include varied styles of commercial and residential structures. The intersection includes stylized brick-laid pedestrian crossings and numerous road markings typical of a road-railway crossing and varied surface materials (i.e. concrete, asphalt, brick), signage, a stoplight, railway crossing gate and lights, and overhead utility lines. This location presents as a transit-focused area of the City and lacks distinctive entrance features to the SWSP area (e.g. orderly rows of mature street trees), with more emphasis placed on functionality. The vacant parcels, as seen in Figure 4.1-2, Photograph 2, are covered in ruderal vegetation and provide a visual buffer from adjacent roadways.

e. Light and Glare

For the purposes of this analysis, light refers to light emissions (brightness) generated by a source of light. Stationary sources of light include exterior parking lot and building security lighting; moving sources of light include the headlights of vehicles driving on roadways near the project site. Streetlights and other security lighting also serve as sources of light in the evening hours.

Glare is defined as focused, intense light emanated directly from a source or indirectly when light reflects from a surface. Daytime glare is caused in large part by sunlight shining on highly reflective surfaces at or above eye level. Glare also refers to the discomfort or impairment of vision

experienced when a person is exposed to a direct or reflected view of a light source, causing objectionable brightness that is greater than that to which the eyes are adapted. Reflective surfaces area associated with buildings that have expanses of polished or glass surfaces, light-colored pavement, and the windshields of parked cars.

Existing development and motor vehicles in Cotati produce light and glare. Primary sources of light are streetlights, parking lot lighting, security lighting, and automotive headlights. General sources of glare include reflected sunlight from the windows of buildings, automobiles, and glass building facades.

4.1.2 Regulatory Setting

a. State Regulations

State Scenic Highway Program

The California Department of Transportation (Caltrans) manages the State Scenic Highway Program, providing guidance and assisting local government agencies, community organizations, and citizens with the process to officially designate scenic highways. The State Scenic Highway Program is intended to “protect and enhance the natural scenic beauty of California highways and adjacent corridors, through special conservation treatment” (Caltrans 2020).

Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Suitability for designation as a state scenic highway is based on vividness, intactness, and unity of the view, as described in *Visual and Aesthetics Review* (Caltrans 2024b):

- Vividness is the extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements. A vivid landscape makes an immediate and lasting impression on the viewer.
- Intactness refers to the integrity of visual order in the landscape and the extent to which the natural landscape is free from visual intrusions, such as buildings, structures, equipment, and grading.
- Unity describes the extent to which development is sensitive to and visually harmonious with the natural landscape.

No officially designated scenic highways occur in the project area. SR 116, which is considered eligible for designation, is located approximately 0.75 mile from the nearest project parcel.

Local Regulations

City of Cotati General Plan

The Cotati General Plan provides the following goals and policies concerning aesthetics, visual resources, and community design and character which apply to the project area.

CONSERVATION ELEMENT

Goal CON 1: Protect and Enhance Cotati's Ecosystem and Natural Habitats

Objective CON 1A: Protect Cotati's Natural Setting and Habitat for Sensitive Plant and Animal Species

Policy CON 1.6: Avoid removal of large, mature trees that provide wildlife habitat or contribute to the visual quality of the environment to the greatest extent feasible through appropriate project design and building siting. If full avoidance is not possible, prioritize planting of replacement trees on-site over off-site locations.

Objective CON 1D: Protect Hillsides and Ridgelines from Visual Impacts and Erosion

Policy CON 1.17: Preserve and protect prominent views of scenic resources, including the Sonoma Mountains, the Laguna de Santa Rosa, local hills, ridgelines, and open space areas surrounding the City, and consider visual access and view corridors when reviewing development proposals.

Action CON 1I: Require assessment of public views and ridgelines as part of the project review process to assure that projects protect natural resources through proper site planning, building design, and landscaping.

ECONOMIC VITALITY ELEMENT

Goal EV 1: Establish and Maintain a Healthy Local Economy That Includes a Diversity of Commercial and Industrial Enterprises Which Provide Goods, Services, and Employment Opportunities to Residents Consistent with Cotati's Small – Town Image

Objective EV 1B: Develop a Distinct Image for Cotati that Sets the City Apart from Surrounding Jurisdictions

Policy EV 1.9: Maintain distinctive landscaping with native plants, trees, and flowers in public areas, including transit stops, City parks, City parking lots, City entry/exit points, to the extent that space is available for landscaping.

OPEN SPACE ELEMENT

Goal OS 1: Preserve and Protect the Natural and Scenic Resources of Cotati

Objective OS 1B: Ensure that Development Within and Near Cotati's Open Spaces, Scenic and Natural Resources Is Visually Unobtrusive and Environmentally Compatible

Policy OS 1.11: Encourage clustered development that preserves a sense of openness, particularly in areas adjacent to open spaces and scenic resources.

Policy OS 1.12: Consider existing scenic resources, including views of the Sonoma Mountains, the Laguna de Santa Rosa, local hills, ridgelines, and open space areas surrounding the City, as resources critical to Cotati's community identity and character.

Action OS 1f: Review all development proposals, planning projects, and infrastructure projects to ensure that open space and scenic resource impacts are reduced by maximizing design features that preserve a sense of open space and by minimizing off-site and night sky impacts of outdoor lighting consistent with the requirements of the Land Use Code.

LAND USE ELEMENT

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

Goal LU 2: Enhance the Quality of Life of Cotati Residents Through the Creation and Maintenance of Well-Designed and Appropriately Served Neighborhoods

Objective LU 2A: Establish and Maintain Residential Neighborhoods as Safe and Attractive Places to Live with Convenient Access to Commercial Services, Recreational Facilities, Employment Opportunities, Public Services, and Other Destinations

Policy LU 2.4: Maintain the character of existing neighborhoods by ensuring new development is compatible in style, size, color, and footprint with the existing residences in the neighborhood.

Policy LU 2.6: Require new residential development to be consistent with the small-town character of Cotati and designed and landscaped in an aesthetically pleasing and sustainable manner.

Objective LU 2B: Encourage an Appropriate Mix of Land Uses in Residential and Commercial Areas

Policy LU 2.12: Continue to permit home occupations in residential areas, provided they do not alter the residential character of the neighborhood.

Goal LU 3: Provide for a Range of Commercial, Industrial, and Mixed Uses to Provide Cotati's Residents Access to Jobs and Employment and to Support the Local Economy

Objective LU 3A: Ensure that Commercial and Industrial Contributes to the Economic Vitality of the City while Also Enhancing the City's Small-Town Character and Quality of Life

Action LU 3c: As part of the City's development review process, continue to ensure that commercial projects are designed to minimize conflicts between commercial and residential uses. Review of commercial projects should ensure that the following design concepts are avoided in projects that abut residential areas:

1. Corporate design "signature" buildings and signage, rather than projects specifically designed to fit into the neighborhood
2. Inappropriate building scale and/or siting on the lot
3. Excessive noise due to long hours of operation or inappropriate location of accessory structures
4. Excessive glare or excessive impacts from light sources onto adjacent properties
5. Unnecessary loss of community and environmental resources (archaeological, historical, ecological, recreational, etc.)

City of Cotati Municipal Code

Title 17 (Land Use) of the Cotati Municipal Code carries out the policies of the Cotati General Plan and provides standards and guidelines for the City's development, assists in protecting the character and identity of Cotati, conserves scenic resources, and ensures compatibility between different types of development and land uses. Specifically, Chapter 17.30 of the Cotati Municipal Code addresses additional details of site planning, project design, and operation of land uses to ensure that proposed development is compatible with existing and future development on neighboring properties, and produces an environment of stable and desirable character, consistent with the general plan and any applicable specific plan. Cotati Municipal Code Section 17.30.060 regulates the placement and direction of light fixtures and ensures that illumination spillover and glare are eliminated to the maximum extent feasible. Cotati Municipal Code Section 17.24.040 provides frontage design and landscape requirements. Cotati Municipal Code Section 17.26 includes street and streetscape standards for the design of public streets, including intersections, and the character of the streetscape between buildings along public streets. Cotati Municipal Code Section 17.30.030 provides height and material requirements for fencing, walls, and screening, including vegetative screens. Cotati Municipal Code Section 17.34 establishes requirements for landscaping, including landscape location and maintenance guidelines to enhance the appearance of development projects, screen potentially incompatible land uses, preserve the integrity of neighborhoods. Cotati Municipal Code Section 17.39 establishes the objective residential design standards which are designed to maintain the rural, small-town feel balanced against a downtown that reflects a focus on intensified development.

Sonoma County Community Separators Protection Ordinance

Community Separators are open space or agricultural lands that separate cities and other communities, contain urban development, and provide city and community identity by offering visual relief from continuous urbanization. The Community Separators Protection Ordinance, commonly called Measure K and passed in 2016, extended voter protections to Community Separator lands for 20 years. The project area is not within or near any Community Separators (County of Sonoma 2020).

4.1.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines* a project may be deemed to have a significant impact on aesthetics if it would:

1. Have a substantial adverse effect on a scenic vista;
2. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
3. In non-urbanized areas, substantially degrade existing visual character or quality of public views of the site and its surroundings; in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality; and/or
4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Methodology

Aesthetics impact assessments involve a qualitative analysis that is subjective but informed by the basic guidelines provided above. Reactions to the same aesthetic conditions vary according to viewer taste and interests. The proposed project is an update to existing land use designations, and not a specific development proposal. This analysis focuses, therefore, on a general discussion of the aesthetic impacts in Cotati, in terms of the arrangement of built space to open space, the density and intensity of development, and how new development visually fits with the existing landscape characteristics of the area.

An adverse effect would occur if development facilitated by the project would block or otherwise damage the scenic vista upon implementation. Impacts on visual character or quality attributable to development facilitated by the proposed project are evaluated relative to visual conditions under buildout. Photographs of the City were reviewed in preparation of this analysis, along with Google Earth imagery and other online visual sources.

Definitions

Visual quality is defined as the overall visual impression or attractiveness of an area based on the scenic resources, both natural and built. The attributes of visual quality include variety, vividness, coherence, uniqueness, harmony, and pattern. **Viewshed** is a term used to describe a range of resources and their context that relate to what people can see in the immediate environment in terms of foreground, middle ground, and background distances.

Impacts to visual quality are perceived by different **viewer types** and to different degrees, depending on the **viewer exposure**. Different land uses, such as open space or commercial districts, derive value from the quality of their settings and, for the purposes of this study, include regionally designated scenic highways, city gateways, and surrounding land features. For example, viewers entering the city can be exposed to views of the Sonoma Mountains or surrounding agricultural lands as they travel. Their exposure would vary based on proximity and ability to see the viewshed.

The importance of scenic resources corresponds to the way relative **viewer sensitivity** may be impacted. This sensitivity is determined by two measures: exposure and awareness. Exposure is the relative proximity of potential viewers to a given scenic resource and awareness indicates the attention and focus viewers bring to the experience of the area. For example, tourists visiting the area to enjoy views of the mountains and the agricultural fields are presumed to have a higher level of sensitivity to the visual quality than would commuters or workers driving equipment in the course of their daily work.

a. Project Impacts and Mitigation

Threshold 1: Would the project have a substantial adverse effect on a scenic vista?
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Impact AES-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA. THEREFORE, IMPACTS RELATED TO SCENIC VISTAS WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.1.1, *Setting*, there are no state-identified scenic vista points in proximity to the project area. Examples of locally-designated scenic views in Cotati include those afforded to people traveling on Petaluma Hill Road and views of the Sonoma Mountains, Laguna de Santa Rosa,

and local hills, ridgelines, and open space areas. The project area is not visible from Petaluma Hill Road due to distance and intervening features (i.e. development, vegetation).

Most of the TOC parcels are currently developed with commercial uses and associated parking lots, with one parcel developed with a single-family residence, and a contiguous portion of two parcels undeveloped (see Figure 4.1-1, Photographs 1 and 2). Views of the Sonoma Mountains, Laguna de Santa Rosa, and local hills, ridgelines, and open space areas (viewsheds) are not immediately available from, or around, the TOC parcels due to existing development on and around the TOC parcels and other intervening features (i.e. distance, vegetation, topography). Thus, development facilitated by the project would not change existing views of scenic vistas. No impact to scenic views or vistas would occur from development facilitated by the project on the TOC parcels.

The SWSP parcels are largely developed with residential and commercial uses, and similar intervening features (i.e. structures, distance, vegetation, topography) block views of the Sonoma Mountains, Laguna de Santa Rosa, and local hills, ridgelines, and open space areas (see Figure 4.1-2, Photographs 1 through 4). At some of the currently vacant SWSP parcels, such as those at the terminus of Santero Way, intermittent views of distant hills and ridgelines are available. Similar sporadic views are available surrounding the SWSP area, however, these views are visually incohesive and cluttered with encroaching manmade elements, and do not represent high quality scenic views. Additionally, regardless of the increased building height allowance proposed by the project, any development (including development currently allowed under existing zoning and land use designations) on these parcels would potentially block these views of the distant hills and ridgelines. Therefore, impacts to scenic views would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2: Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact AES-2 THERE ARE NO DESIGNATED STATE SCENIC HIGHWAYS IN THE VICINITY OF THE PROPOSED PROJECT. NO IMPACT TO SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY WOULD OCCUR.

As described in Section 4.1.1, *Setting*, there are no designated state scenic highways in the vicinity of the project area. Individual parcels within the project area are not visible from a designated scenic highway. Consequently, the proposed project would not have the potential to result in damage to scenic resources within a state scenic highway. No impact would occur.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

No impact would occur.

Threshold 3: Would the project, 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 a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact AES-3 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD FACILITATE DEVELOPMENT ON PREVIOUSLY UNDEVELOPED PARCELS AND WOULD CHANGE DEVELOPMENT STANDARDS INCLUDING RESIDENTIAL DENSITY, BUILDING HEIGHTS, ALLOWED USES, AND PARKING REQUIREMENTS. HOWEVER, SCENIC QUALITY WOULD BE PROTECTED THROUGH ADHERENCE TO CITY DESIGN GUIDELINES AND IMPLEMENTATION OF GOALS AND POLICIES IN THE COTATI GENERAL PLAN THAT ADDRESS VISUAL CHARACTER AND QUALITY OF PUBLIC VIEWS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Pursuant to Public Resources Code Section 21071, the City of Cotati is not an “urbanized area” because it is not a city or part of a group of contiguous cities with a population of 100,000 or more. The project area is surrounded by existing development, but is not considered “urban” as defined by CEQA.

As described under Impact AES-1, there are limited glimpses of scenic resources from the project area, and such views do not represent high quality public views. Any development (including development currently allowed under existing zoning and land use designations) in the project area would potentially block these views of the distant hills and ridgelines. Therefore, the project would not substantially degrade the existing quality of public views.

The proposed project would facilitate development on previously undeveloped parcels and would change development standards including residential density, building heights, allowed uses, and parking requirements. Under the proposed project, new development in the SWSP area would be required to comply with new objective design standards. As a part of the proposed zoning changes, objective design standards regulating aesthetics (architectural style and design features, open space amenity types, parking placement and screening, etc.) would be adopted for the SWSP area. The overall vision of the proposed project would largely preserve the visual character in the SWSP area and enhance its visual quality by establishing development standards and design guidelines to ensure compatibility with existing land uses and an updated planning framework to facilitate and guide future development. These updated standards and guidelines would ensure the implementation of high-quality development which is designed to be cohesive and consistent with the character of the city. Development on the TOC parcels would continue to be subject to the City’s existing design standards.

The proposed project would comply with the goals and policies of the Cotati General Plan to ensure consistency with regulations governing visual quality and character. Cotati General Plan Policy CON 1.6 would minimize removal of large trees, which help provide a feeling of establishment and a closeness with nature; Policy CON 1.17 and Action CON 1I would protect public views of hillsides and ridgelines; and Policy EV 1.9 requires landscape maintenance in public areas to preserve the cleanliness and cohesion within the landscape. Furthermore, Policies OS 1.11, OS 1.12, LU 2.4, LU 2.6, LU 2.12, and Action LU 3C ensure compatibility of new development with the existing character of the city through preservation of open space and requirements for visually cohesive landscaping and development. Additionally, development facilitated by the project be required to adhere to the Cotati Municipal Code, including Sections 17.30, 17.24.040, 17.26, and 17.39, which establish requirements for compatible project design; cohesive frontage, street and streetscape, and landscape design; and objective design standards.

Development facilitated by the project on the SWSP parcels would be required to comply with updated design standards and development guidelines, while development facilitated by the project on the TOC parcels would continue to be required to comply with the City's design standards and development guidelines. All development facilitated by the project would be subject to the Cotati General Plan goals and policies intended to maintain a consistent visual character in areas of new development as well as the Cotati Municipal Code. Adherence to the design standards, the Coati General Plan goals and policies, and the Cotati Municipal Code would ensure that high-quality development is implemented and is visually coherent with the existing character of the city and surrounding development. Therefore, the development facilitated by the project would not degrade the existing visual character or quality of public views of the project area and its surroundings. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4: Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INTRODUCE NEW SOURCES OF LIGHT AND GLARE IN THE PROJECT AREA. WITH ADHERENCE TO EXISTING ORDINANCES THAT REGULATE LIGHT AND GLARE FOR NEW DEVELOPMENT, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.1.1, *Setting*, the project area is located within a developed community with open space and agricultural zones at its edges. Existing light levels in the project area are moderately high in the developed areas, with car headlights, streetlights, exterior building lighting, and lighted signs contributing to the lighting levels. Lighting resulting from development facilitated by the project would contribute to existing lighting levels in the project area. Glare would be higher where buildout of the proposed project results in structures with window features and parking areas where cars may have sun reflecting off the windshields, which would contribute to existing glare in the city.

However, development facilitated by the project would be subject to detailed City regulations that govern lighting. These include the Cotati Municipal Code Section 17.30.060, which limits placement and direction of exterior lighting fixtures, and requires light fixtures to be shielded or recessed to eliminate spillover illumination or glare onto adjoining properties to the maximum extent feasible. Development facilitated by the project would also include the installation of landscaping and trees as required by Cotati Municipal Code Sections 17.26, 17.30.030, 17.34, and 17.39, and vegetation screening and shade would help reduce glare by shading and filtering reflective components such as windows. Further, the new objective design standards requirement for screened or tuck-under ground floor parking would similarly reduce the effects of glare from vehicle surfaces and headlight illumination.

Additionally, development facilitated by the proposed project would be required to comply with Cotati General Plan goals and policies related to lighting, including Actions OS 1f and LU 3c, which minimize off-site and night sky impacts and excessive glare through development review and design features.

Adherence to regulations within the City's Municipal Code and guidance within Cotati General Plan Actions OS 1f and LU 3c would ensure that the project does not result in new sources of substantial light and glare, and that daytime or nighttime views in the area are not adversely affected. These impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.1.4 Cumulative Impacts

The geographic scope for cumulative aesthetics impacts is generally described by development located within one mile of the project area. This geographic scope is appropriate for aesthetics because these are areas that are either located in close proximity or along the same major arterial streets as the project site and construction schedules may overlap. Areas at a greater distance would be separated by intervening topography, vegetation, and buildings, obstructing views in all directions from the project area, and lighting and glare generally only affects adjacent properties.

Buildout of cumulative projects would have limited, site-specific impacts on public viewsheds and scenic vistas throughout the project area due to intervening features (i.e. topography, vegetation, and buildings) largely obscuring scenic resources in the area. Most of the cumulative projects would not result in substantial impacts to public viewsheds or scenic vistas given the proposed massing and heights of structures, or the proposed locations within developed areas with comparable structures. Cumulative projects would undergo design review and/or environmental review to mitigate adverse effects to scenic vistas to the extent feasible, and cumulative impacts to scenic vistas would be less than significant.

Scenic highways traverse the county in some areas but not within the vicinity of the project area. Cumulative development would be required to adhere to applicable zoning and development regulations and applicable General Plan policies to mitigate environmental impacts where feasible and discretionary projects would undergo environmental as well as design review, including consideration of whether the projects would affect visual resources within a state scenic highway. Cumulative impacts to scenic resources within a state scenic highway would not be significant.

The visual character of Cotati is protected through the City's zoning, development regulations, General Plan policies, and design review. Cumulative development would be required to adhere to applicable regulations and requirements and perform environmental review to mitigate environmental impacts where feasible, including consideration of whether the projects would substantially degrade the existing visual character or quality of public views of a given site and its surroundings. With these considerations prior to project approval, cumulative impacts related to visual character and the quality of public views would be less than significant.

An increase in light and glare, and associated adverse effects to daytime or nighttime views, could be cumulatively considerable as the cumulative projects area continues to be built out. Cumulative projects would be required to undergo individual design review, and regulations that govern light and glare would apply to cumulative projects, which would ensure adherence to applicable General Plan and Municipal Code standards related to reducing sources of light and glare. Cumulative impacts related to substantial sources of light or glare and adverse effects to daytime or nighttime views would be less than significant.

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4.2 Air Quality

This section analyzes the potential air quality impacts associated with construction and operation of the project, including from conflicts with applicable air quality plans, exceedance of air quality standards from criteria pollutant emissions, exposure of sensitive receptors to substantial pollutant concentrations, and odor emissions.

4.2.1 Setting

a. Regional Climate and Meteorology

The City of Cotati is located in Sonoma County, within the San Francisco Bay Area Air Basin (SFBAAB). The SFBAAB includes the counties of San Francisco, Santa Clara, San Mateo, Marin, Napa, Contra Costa, and Alameda, along with the southeast portion of Sonoma County and the southwest portion of Solano County. Sonoma County is bounded on the west by the Pacific Ocean, on the east by Napa and Lake counties, on the south by San Pablo Bay, and on the north by Mendocino County.

Due to the proximity of the San Francisco Bay and Pacific Ocean, the climate in the SFBAAB is characterized by warm dry summers and cool moist winters. In summers, temperatures in Cotati generally range from the 40s to high 70s and low 80s (Fahrenheit). In winter, temperatures range from the 30s to the 60s (Fahrenheit).

The major large-scale weather feature controlling climate in the Cotati region is a large high-pressure system located in the eastern Pacific Ocean, known as the Pacific High. During winter months, marine air trapped in the lower atmosphere is often condensed into fog by the cool Pacific Ocean. Stratus-type clouds usually form offshore and move into the area during the evening hours. During winter months, the Pacific High becomes weaker and shifts south, allowing weather systems associated with the polar jet stream to affect the region. Low pressure systems produce periods of cloudiness, strong shifting winds and precipitation. The City of Cotati, which lies mostly on the lee side of the coastal mountains in Sonoma County, receives about 32 inches of precipitation per year. Mountains to the west receive 40 to 50 inches. Most rainfall occurs from November through March. High-pressure systems are also common in winter, with low-level inversions that produce cool stagnant conditions.

The prevailing wind in most of the City of Cotati is primarily from a westerly direction, especially during spring and summer. In winter, winds become variable with more of a southeasterly orientation. Nocturnal winds and land breezes during the colder months of the year prevail with variable drainage out of the mountainous areas. Wind speeds are highest during the spring and early summer and lightest in the fall. Winter storms bring relatively short episodes of strong southerly winds.

b. Air Quality Pollutants of Primary Concern

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack). The federal and state Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the United State Environmental Protection Agency (USEPA), and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for “criteria pollutants” and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, volatile organic

compounds (VOC)/reactive organic gases (ROG),¹ nitrogen oxides (NO_x), particulate matter with diameters of up to 10 microns (PM₁₀) and up to 2.5 microns (PM_{2.5}), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO_x. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). The characteristics, sources and effects of criteria pollutants are discussed in the following subsections. The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

Ozone

Ozone is produced by a photochemical reaction (triggered by sunlight) between NO_x and ROG. ROG are composed of non-methane hydrocarbons (with some specific exclusions), and NO_x is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and nitrogen dioxide. NO_x are formed during the combustion of fuels, while ROG are formed during combustion and evaporation of organic solvents. As a highly reactive molecule, ozone readily combines with many different components of the atmosphere. Consequently, high levels of ozone tend to exist only while high ROG and NO_x levels are present to sustain the ozone formation process. Once the precursors have been depleted, ozone levels rapidly decline. Because these reactions occur on a regional rather than local scale, ozone is considered a regional pollutant. In addition, because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans, including changes in breathing patterns, reduction of breathing capacity, increased susceptibility to infections, inflammation of lung tissue, and some immunological changes (United States Environmental Protection Agency [USEPA] 2024). Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

Carbon monoxide is a localized pollutant that is found in high concentrations only near its source. The major source of carbon monoxide, a colorless, odorless, poisonous gas, is the incomplete combustion of petroleum fuels by automobile traffic. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Other sources of carbon monoxide include the incomplete combustion of petroleum fuels at power plants and fuel combustion from wood stoves and fireplaces during the winter. The health effects of carbon monoxide are related to its affinity for hemoglobin in the blood. Carbon monoxide causes a number of health problems, including aggravation of some heart diseases (e.g., angina), reduced tolerance for exercise, impaired mental function, and impaired fetal development. At high levels of exposure, carbon monoxide reduces the amount of oxygen in the blood, leading to mortality (USEPA 2024). Carbon monoxide tends to dissipate rapidly into the atmosphere; consequently, violations of the NAAQS and/or CAAQS for carbon monoxide are generally associated with localized carbon monoxide “hotspots” that can occur at major roadway intersections during heavy peak-hour traffic conditions.

¹ CARB defines VOC and ROG similarly as, “any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate,” with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term ROG is used in this analysis.

Nitrogen Dioxide

Nitrogen dioxide is a by-product of fuel combustion; the primary sources are motor vehicles and industrial boilers and furnaces. The principal form of NO_x produced by combustion is nitric oxide, but nitric oxide reacts rapidly to form nitrogen dioxide, creating the mixture of nitric oxide and nitrogen dioxide commonly called NO_x . Nitrogen dioxide is an acute irritant that can aggravate respiratory illnesses and symptoms, particularly in sensitive groups (USEPA 2024). A relationship between nitrogen dioxide and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility (USEPA 2024). It can also contribute to the formation of PM_{10} and acid rain.

Sulfur Dioxide

Sulfur dioxide is included in a group of highly reactive gases known as “oxides of sulfur.” The largest sources of sulfur dioxide emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of sulfur dioxide emissions include industrial processes such as extracting metal from ore and the burning of fuels with a high sulfur content by locomotives, large ships, and off-road equipment. Sulfur dioxide is linked to a number of adverse effects on the respiratory system, including aggravation of respiratory diseases, such as asthma and emphysema, and reduced lung function (USEPA 2024).

Particulate Matter

Suspended atmospheric PM_{10} and $\text{PM}_{2.5}$ is comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. Both PM_{10} and $\text{PM}_{2.5}$ are directly emitted into the atmosphere as by-products of fuel combustion, wildfire, and wind erosion of soil and unpaved roads. Particulate matter is also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with PM_{10} and $\text{PM}_{2.5}$ can be very different. PM_{10} is generally associated with dust mobilized by wind and vehicles while $\text{PM}_{2.5}$ is generally associated with combustion processes as well as formation in the atmosphere as a secondary pollutant through chemical reactions. $\text{PM}_{2.5}$ is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems (USEPA 2024). More than half of $\text{PM}_{2.5}$ that is inhaled into the lungs remains there. These materials can damage health by interfering with the body’s mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance. Suspended particulates can also reduce lung function, aggravate respiratory and cardiovascular diseases, increase mortality rates, and reduce lung function growth in children (USEPA 2024).

Lead

Lead is a metal found naturally in the environment, as well as in manufacturing products. The major sources of lead emissions historically have been mobile and industrial sources. However, as a result of USEPA’s regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred prior to 1990 due to the removal of lead from gasoline sold for most highway vehicles. Lead emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least in part as a result of national emissions standards for hazardous air pollutants (USEPA 2013). As a result of phasing out leaded gasoline, metal processing currently is the primary source of lead emissions. The highest level of lead in the

air is generally found near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. The health impacts of lead include behavioral and hearing disabilities in children and nervous system impairment (USEPA 2024).

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about 1/70th the diameter of a human hair) and thus is a subset of PM_{2.5}. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2022). Within the SFBAAB, DPM accounted for approximately 85 percent of the cancer risk from air toxics in the region with mobile sources being one of the top contributors (BAAQMD 2014).

TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

c. Air Pollution Regulation

The federal and state governments have authority under the federal and state CAAs to regulate emissions of airborne pollutants and have established NAAQS and CAAQS for the protection of public health. Federal and state standards have been established for six criteria pollutants, including ozone, CO, NO₂, SO₂, particulate matter, and lead.

Air quality monitoring stations measure pollutant ground-level concentrations (typically, 10 feet above ground level). Depending on whether the standards are met or exceeded, the local air basin is classified as in “attainment” or “non-attainment.” Some areas are unclassified, which means no monitoring data are available. Unclassified areas are considered to be in attainment. Table 4.2-1 lists the current federal and state standards for each of these pollutants as well as the attainment status of the SFBAAB. California air quality standards are generally identical to or stricter than federal standards for all criteria pollutants.

Table 4.2-1 Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone	8 Hour	0.070 ppm	Nonattainment	0.070 ppm	Nonattainment
	1 Hour	0.09 ppm	Nonattainment		
Carbon Monoxide	8 Hour	9.0 ppm	Attainment	9 ppm	Attainment
	1 Hour	20 ppm	Attainment	35 ppm	Attainment
Nitrogen Dioxide	1 Hour	0.18 ppm	Attainment	0.100 ppm	Unclassified
	Annual Arithmetic Mean	0.030 ppm		0.053 ppm	Attainment
Sulfur Dioxide	24 Hour	0.04 ppm	Attainment	0.14 ppm	Attainment
	1 Hour	0.25 ppm	Attainment	0.075 ppm	Attainment
	Annual Arithmetic Mean			0.030 ppm	Attainment
Particulate Matter, Coarse (PM ₁₀)	Annual Arithmetic Mean	20 µg/m ³	Nonattainment		
	24 Hour	50 µg/m ³	Nonattainment	150 µg/m ³	Unclassified
Particulate Matter, Fine (PM _{2.5})	Annual Arithmetic Mean	12 µg/m ³	Nonattainment	9 µg/m ³	Unclassified/Attainment
	24 Hour			35 µg/m ³	Nonattainment
Sulfates	24 Hour	25 µg/m ³	Attainment		
Lead	Calendar Quarter			1.5 µg/m ³	Attainment
	Rolling 3 Month Average			0.15 µg/m ³	
	30 Day Average	1.5 µg/m ³			Attainment
Hydrogen Sulfide	1 Hour	0.03 ppm	Unclassified		
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm	No information available		
Visibility Reducing particles	8 Hour (10:00 to 18:00 PST)		Unclassified		

ppm = parts per million; mg/m³ = milligrams per cubic meter; PST = Pacific Standard Time
 Note: The USEPA revised the NAAQS for annual PM_{2.5} on February 7, 2024, from 12 µg/m³ to 9 µg/m³
 Source: BAAQMD 2017a

Local control in air quality management is provided by CARB through county-level or regional (multi-county) air districts. CARB establishes statewide air quality standards and is responsible for control of mobile emission sources, while the local air districts are responsible for enforcing standards and regulating stationary sources. CARB has established 15 air basins statewide. The City of Cotati is located in the SFBAAB, which is under the jurisdiction of BAAQMD.

d. Current Air Quality

CARB and the USEPA established ambient air quality standards for major pollutants, including ozone, CO, NO₂, SO₂, lead, PM₁₀, and PM_{2.5}. Standards have been set at levels intended to be protective of public health. California standards are more restrictive than federal standards for each of these pollutants except for lead and the eight-hour average for CO (which are numerically

identical to the federal standards). The local air districts are required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. As the local air quality management agency, the BAAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The Sebastopol-103 Morris Street Monitoring Station (approximately 8 miles northwest of the City of Cotati) was used for ozone and PM_{2.5} air quality data and the Healdsburg-133 Matheson Street Monitoring Station (approximately 22 miles north of the City of Cotati) was used for PM₁₀ air quality data. Table 4.2-2 summarizes the representative annual air quality data for the project area over the years 2020 through 2022 at the Sebastopol and Healdsburg Monitoring Stations. As shown in Table 4.2-2, PM₁₀ measurements exceeded the CAAQS in 2020 and 2021. The PM_{2.5} measurements exceeded the federal threshold in 2020. No other standards were exceeded in the years 2020, 2021, or 2022.

Table 4.2-2 Ambient Air Quality Data

Pollutant	2020	2021	2022
Ozone (ppm), Worst 1-Hour ¹	0.068	0.071	0.064
Number of days of State exceedances (>0.09 ppm)	0	0	0
Ozone (ppm), 8-Hour Average ¹	0.058	0.063	0.055
Number of days of State exceedances (>0.07 ppm)	0	0	0
Number of days of Federal exceedances (>0.07 ppm)	0	0	0
Particulate Matter <10 microns, µg/m ³ , Worst 24 Hours ²	129.4	57.4	47.0
Number of days above State standard (>50 µg/m ³)	10	2	0
Number of days above Federal standard (>150 µg/m ³)	0	0	0
Particulate Matter <2.5 microns, µg/m ³ , Worst 24 Hours ¹	124.3	29.5	25.5
Number of days above Federal standard (>35 µg/m ³)	7	0	0

ppm = parts per million; µg/m³ = micrograms per cubic meter

¹ Measurements taken from the Sebastopol-103 Morris Street Monitoring Station

² Measurements taken from the Healdsburg-133 Matheson Street Monitoring Station

Source: CARB 2023

e. Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient to protect public health and welfare, with a margin of safety. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14, the elderly over 65, persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. Therefore, sensitive receptor locations include schools, hospitals, senior living centers, and residences.

4.2.2 Regulatory Setting

a. Federal Regulations

Federal Clean Air Act

The Federal CAA governs air quality in the United States. The USEPA is charged with implementing national air quality programs. USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), passed in 1963 by the U.S. Congress and amended several times. The 1970 federal CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including non-attainment requirements for areas not meeting NAAQS and the Prevention of Significant Deterioration program. The 1990 federal CAA amendments represent the latest in a series of federal efforts to regulate air quality in the United States.

National Ambient Air Quality Standards

The federal CAA requires USEPA to establish primary and secondary NAAQS for several criteria air pollutants. The air pollutants for which standards have been established are considered the most prevalent air pollutants known to be hazardous to human health. NAAQS have been established for ozone, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and lead.

b. State Regulations

California Clean Air Act

Air quality in California is also governed by more stringent regulations under the California CAA. The California CAA is administered by the CARB at the state level and by the AQMDs at the regional and local levels. The California CAA, signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practical date. CARB is the State air pollution control agency and is a part of the California Environmental Protection Agency. CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California, and for implementing the requirements of the California CAA. CARB oversees local district compliance with federal and California laws, approves local air quality plans, submits the State implementation plans to the USEPA, monitors air quality, determines and updates area designations and maps, and sets emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

California Ambient Air Quality Standards

The California CAA requires CARB to establish ambient air quality standards for California, known as CAAQS. Similar to the NAAQS, CAAQS have been established for criteria pollutants and standards are established for vinyl chloride, hydrogen sulfide, sulfates, and visibility-reducing particulates. In general, the CAAQS are more stringent than the NAAQS on criteria pollutants. The California CAA requires all local air districts to endeavor to achieve and maintain the CAAQS by the earliest practical date. The California CAA specifies that local air districts focus attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

c. Local Regulations

Bay Area Air Quality Management District

The BAAQMD regulates air quality at the regional level, which includes the nine-county Bay Area, including the southern portion of Sonoma County. The BAAQMD is the agency primarily responsible for assuring national and State ambient air quality standards are attained and maintained in the SFBAAB. The BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities. The BAAQMD updated the CEQA Air Quality Guidelines in 2022, which provides best practices, thresholds of significance, screening criteria, etc., for project and plan level impacts (BAAQMD 2023).

The BAAQMD adopted the 2017 Clean Air Plan as an update to the 2010 Clean Air Plan. The 2017 Clean Air Plan provides a regional strategy to protect public health and protect the climate. To fulfill State ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors—ROG and NO_x—and reduce transport of ozone and its precursors to neighboring air basins. In addition, the 2017 Clean Air Plan builds upon and enhances the BAAQMD's efforts to reduce emissions of fine particulate matter and TACs (BAAQMD 2017b).

BAAQMD also maintains rules and regulations intended to reduce construction air quality emissions through best practices. These include the following:

- **Regulation 2: Permits.** This regulation provides an orderly procedure for the review of new sources of air pollution, and of the modification and operation of existing sources, and of associated air pollution control devices, through the issuance of authorities to construct and permits to operate.
- **Regulation 6, Rule 6: Prohibition of Trackout.** This rule limits the quantity of particulate matter in the atmosphere through control of trackout of solid materials onto paved public roads outside the boundaries of large construction sites and large disturbed surface sites greater than 1 acre in size.
- **Regulation 8, Rule 3: Architectural Coatings.** This rule limits the quantity of volatile organic compounds in architectural coatings supplied, sold, offered for sale, applied, solicited for application, or manufactured for use within the District.
- **Regulation 8, Rule 4: General Solven and Surface Coating Operations.** This rule limits emissions of volatile organic compounds from the use of solvents and surface coatings.
- **Regulation 8, Rule 49: Aerosol Paint Products.** This rule limits emissions of organic compounds from the use of hand-held aerosol paint products.
- **Regulation 11, Rule 1: Lead.** This rule controls the emission of lead to the atmosphere.
- **Regulation 11, Rule 2: Asbestos Demolition, Renovation, and Manufacturing.** This rule controls emissions of asbestos to the atmosphere during demolition, renovation, milling and manufacturing and establish appropriate waste disposal procedures.

City of Cotati General Plan

The City of Cotati General Plan contains air pollution goals, objectives, and policies for the City. The Circulation Element includes the following goal and policies related to reducing vehicle trips through the provision of alternative modes of transportation, which would reduce air quality emissions from mobile sources:

Goal CI-2: Maintain and Expand a Safe and Efficient Pedestrian, Bicycle, and Transit Network That Connects Neighborhoods With Key Destinations to Encourage Travel by Non-Automobile Modes While Also Improving Public Health

Policy CI 2.3: Require development projects to construct sidewalks and walkways on and off-site in order to maintain consistency with the City's Bicycle and Pedestrian Master Plan, and as dictated by the location of transit stops and common pedestrian destinations.

Policy CI 2.10: Continue to provide secure bicycle racks in the Hub, future and existing commercial areas, park-and-ride transit facilities, schools, and multiple unit residential developments.

Policy CI 2.19: Establish the SMART multi-modal transit station on East Cotati Avenue and Santero Way to provide a link between commuter rail, bus, pedestrian, and bicycle travel and to provide retail and services to serve SMART transit users.

The Conservation Element of the General Plan includes the following goals and policies intended to reduce air quality emissions through project design requirements and considerations:

Goal CON 2: Reduce Air Pollutants and Greenhouse Gas Emissions

Objective CON 2A: Improve Air Quality in Cotati and Reduce Air Quality Impacts from Future Development

Policy CON 2.1: Improve air quality through continuing to require a compact development pattern that focuses growth in and around existing urbanized areas, locating new housing near places of employment, encouraging alternative modes of transportation, and requiring projects to mitigate significant air quality impacts.

Policy CON 2.2: Minimize exposure of sensitive receptors to concentrations of air pollutant emissions and toxic air contaminants.

Policy CON 2.3: Require discretionary projects involving sensitive receptors such as children, the elderly, or people with respiratory diseases proposed within 500 feet of the Highway 101 corridor to include an analysis of mobile source toxic air contaminant health risks. The analysis, if necessary, shall identify feasible mitigation measures to reduce health risks to acceptable levels.

Policy CON 2.4: Require new development or significant remodels to install fireplaces, stoves, and/or heaters which meet current BAAQMD standards.

Policy CON 2.5: Continue to require all construction projects and ground disturbing activities to implement BAAQMD dust control and abatement measures.

Goal CON 3: Promote Conservation of Energy and Other Natural Resources

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 sources 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.

City of Cotati Municipal Code

The project is subject to certain provisions within the City of Cotati Municipal Code. Examples of Municipal Codes that apply the project and are related to air quality emissions, include, but are not limited to:

- Chapter 8.08 – Solid Waste Management
- Chapter 8.10 – Mandatory Organic Waste Disposal Reduction
- Chapter 8.22 – Source Reduction and Recycling
- Chapter 17.34 – Water Efficient Landscaping Standards

Santero Way Specific Plan

The Santero Way Specific Plan (SWSP) was adopted in August 2001, and originally envisioned a mixed-use office neighborhood, adjacent to the Cotati SMART Station. The primary objective of the original SWSP was to increase the number of residents and employees within walking distance (0.5 mile) of the Cotati SMART Station. Specifically, the original SWSP envisioned the development of 198 new dwelling units, 339,200 square-feet of office and institutional uses, 68,000 square-feet of retail uses, and 57,000 square feet of supporting parkland/open space.

4.2.3 Impact Analysis

a. Significance Thresholds

This analysis uses the BAAQMD's 2022 *CEQA Air Quality Guidelines* to evaluate air quality. The plan-level thresholds specified in the 2022 BAAQMD *CEQA Air Quality Guidelines* were used to determine whether the proposed project impacts exceed the thresholds identified in *CEQA Guidelines* Appendix G.

Based on Appendix G of the *CEQA Guidelines* a project may be deemed to have a significant impact on air quality if it would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard;
3. Expose sensitive receptors to substantial pollutant concentrations; and/or
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Construction Emissions

BAAQMD's 2022 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutants emissions. However, they do include the individual project-level thresholds for temporary construction-related and long-term operational emissions of air pollutants. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions (BAAQMD 2023). Construction emissions associated with plan implementation are discussed qualitatively to evaluate potential air quality impacts.

Operational Emissions

The BAAQMD's 2022 *CEQA Air Quality Guidelines* contain specific operational plan-level significance thresholds for criteria air pollutants. Plans must show the following over the planning period:

- Consistency with current air quality plan control measures, and
- Vehicle miles traveled (VMT) or vehicle trips increase is less than or equal to the plan's projected population increase.

If a plan can demonstrate consistency with both criteria, then impacts would be less than significant. The current air quality plan is the 2017 Clean Air Plan. Development facilitated by the project would be required to adhere to the City of Cotati's General Plan or Santero Way Specific Plan (in the SWSP area only), depending on the individual development project's location. Therefore, demonstrating consistency with the General Plan, Specific Plan, and 2017 Clean Air Plan would result in a less than significant impact.

b. Methodology for Estimating Emissions

Construction Emissions

Construction-related emissions are temporary but may still cause adverse air quality impacts. Construction of development associated with the proposed project would generate temporary emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances.

Much of the development contemplated by the project has been previously analyzed in certified project-specific EIRs. The Santero Way Specific Plan (SWSP) was adopted in August 2001, and originally envisioned a mixed-use office neighborhood, adjacent to the SMART rail station. The primary objective of the original SWSP was to increase the number of residents and employees within walking distance (0.5 mile) of the SMART station.

There is not sufficient detail to allow project-level analysis of the development facilitated by the project at this time. Because it would be speculative to analyze project-level impacts of the remaining development contemplated by the project, these construction impacts are discussed qualitatively, and emissions are not compared to the project-level thresholds.

Operation Emissions

Based on plan-level guidance from the BAAQMD 2022 *CEQA Air Quality Guidelines*, long-term operational emissions associated with implementation of the proposed project are discussed qualitatively by comparing the proposed project to the 2017 Clean Air Plan goals, policies, and control measures. In addition, comparing the rate of increase of plan VMT and population is recommended by BAAQMD for determining significance of criteria pollutants. If the proposed project does not meet either criterion then impacts would be potentially significant.

c. Project Impacts and Mitigation Measures

Threshold 1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH BAAQMD'S 2017 CLEAN AIR PLAN AS WELL AS THE COTATI GENERAL PLAN AND EXISTING SANTERO WAY SPECIFIC PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The most recently adopted air quality plan in the SFBAAB is the 2017 Clean Air Plan. The 2017 Clean Air Plan is a roadmap showing how the San Francisco Bay Area will achieve compliance with the State one-hour ozone standard as expeditiously as practicable, and how the region will reduce transport of ozone and ozone precursors to neighboring air basins. The 2017 Clean Air Plan does not include control measures that apply directly to individual development projects. Instead, the control strategy includes stationary-source control measures to be implemented through the BAAQMD regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with the Metropolitan Transportation Commission (MTC), local governments, and transit agencies. The 2017 Clean Air Plan also represents the Bay Area's most recent triennial assessment of the region's strategy to attain the state one-hour ozone standard. In this, the 2017 Clean Air Plan replaces the 2010 Clean Air Plan. Under BAAQMD's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

- Supports the primary goals of the 2017 Clean Air Plan;
- Includes applicable control measures from the 2017 Clean Air Plan; and
- Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures.

The following includes a discussion of consistency with these criteria.

The 2017 Clean Air Plan contains 85 control strategies aimed at reducing air pollution and protecting the climate in the Bay Area. For consistency with climate planning efforts at the State level, the control strategies in the 2017 Clean Air Plan are based on the same economic sector framework used by CARB, which encompass stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Table 4.2-3 identifies applicable control measures and correlates the measures to development that would be facilitated by the project, through proposed project design and General Plan and Specific Plan policies.

Table 4.2-3 2017 Clean Air Plan Control Measures

Control Measures	Consistency
Transportation	
<p>TR2: Trip Reduction Programs. Implement the regional Commuter Benefits Program (Rule 14-1) that requires employers with 50 or more Bay Area employees to provide commuter benefits. Encourage trip reduction policies and programs in local plans, e.g., general and specific plans, while providing grants to support trip reduction efforts. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to adopt transit benefits ordinances in order to reduce transit costs to employees, and to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. Fund various employer-based trip reduction programs.</p>	<p>Consistent. The proposed project would promote mixed-use development and compatible land uses resulting in City residents living and working in closer proximity to each other. In addition, the project would encourage mixed-use developments near transit (e.g., the Cotati SMART Station). Proximity to the Cotati SMART Station would encourage future residents of the project area to use multi-modal transportation to commute instead of traveling by vehicle. By placing employment and commercial opportunities closer to residences through mixed-use development, the project would encourage less vehicles trips since residents may walk or bike to jobs and services.</p> <p>In addition, General Plan goals and policies would reduce vehicle trips generated by future development. Goal CI-2 and associated policies of the General Plan Circulation Element would promote alternative modes of transportation, such as walking and bicycling, and the use of public transit systems.</p>
<p>TR9: Bicycle and Pedestrian Access and Facilities. Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.</p>	<p>Consistent. The proposed SWSP Update encourages the development of internal bicycle and pedestrian facilities in the SWSP area. Additionally, policies in the General Plan support an efficient and safe bicycle and pedestrian system that would improve the connectivity and accessibility throughout the City. Under Circulation Element Goal CI-2, the City would provide continuous safe and efficient alternative traveling methods (e.g., walking and biking) to population destinations, such as downtown and commercial centers. This goal aims to provide a safe and convenient bicycle and pedestrian network that accommodates all ages and abilities. In particular, several of the policies under this goal aim to provide more bike parking to encourage the use of active transportation modes and thus avoid vehicle trips and emissions associated with those trips.</p>
Energy	
<p>EN1: Decarbonize Electricity Production. Engage with PG&E, municipal electric utilities and CCEs to maximize the amount of renewable energy contributing to the production of electricity within the Bay Area as well as electricity imported into the region. Work with local governments to implement local renewable energy programs. Engage with stakeholders including dairy farms, forest managers, water treatment facilities, food processors, public works agencies and waste management to increase use of biomass in electricity production.</p>	<p>Consistent. As noted in Section 4.15, <i>Utilities and Service Systems</i>, electricity would be provided to the project area by Sonoma Clean Power (SCP) and PG&E. SCP offers two clean energy services, which provide 88 percent and 100 percent carbon-free electricity. PG&E also sources electricity from some renewable sources. Development facilitated by the project would receive electricity from SCP and/or PG&E, at the discretion of the landowner.</p>
<p>EN2: Decrease Electricity Demand. Work with local governments to adopt additional energy-efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.</p>	<p>Consistent. Development facilitated by the project would comply with City of Cotati requirements regarding energy usage and conservation, as required by General Plan goals and policies. This includes specific street design requirements and encourages tree planting to reduce cooling energy needs. Development in the project area would also comply with the California Green Building Standards Code (CALGreen), which include energy efficiency requirements for new development.</p>

Control Measures	Consistency
Waste Management	
WA4: Recycling and Waste Reduction. Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects.	Consistent. Development facilitated by the project would be required to comply with solid waste diversion requirements, including 50 percent diversion of solid waste and 75 percent diversion of organic waste (by 2025). New development facilitated by the project would be required to provide on-site trash, recycling, and compost receptacles for collection and disposal in an effort to increase diversion of solid waste from new residential and non-residential uses. These requirements are codified in Chapters 8.08, 8.10, and 8.22 of the Cotati Municipal Code.
Water	
WR2: Support Water Conservation. Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	Consistent. Development in the project area would comply with CALGreen, which includes water use efficiency requirements for new development. The City also requires compliance with water efficient landscaping standards, which are codified in Chapter 17.34 of the Cotati Municipal Code.
Source: BAAQMD 2017b	

Table 4.2-3 demonstrates that the project would not disrupt or hinder implementation of 2017 Clean Air Plan control measures through compliance with the state and local requirements for individual new development projects. Buildout of the project would not otherwise disrupt regional planning efforts to reduce VMT and meet federal and State air quality standards. Furthermore, the project would be consistent with City of Cotati General Plan Goals CI-2, CON 2 and CON 3 with proximity to the Cotati SMART station, usage of SCP and adherence to CALGreen standards. Similarly, the project will be consistent with the elements of the original Santero Way Specific Plan while updates that are proposed under the project will be consistent with the other air quality plans.

Therefore, the project would be consistent with the applicable control measures contained in the 2017 Clean Air Plan for the SFBAAB, the City of Cotati General Plan and the Santero Way Specific Plan; the project would not hinder implementation of any air quality plan control measures.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold 2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Impact AQ-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN THE TEMPORARY GENERATION OF AIR POLLUTANTS DURING CONSTRUCTION, WHICH WOULD AFFECT LOCAL AIR QUALITY. POLICY CON 2.5 IN THE GENERAL PLAN REQUIRES INDIVIDUAL PROJECTS TO INCORPORATE THE BAAQMD BASIC CONSTRUCTION MITIGATION MEASURES, WHICH WOULD REDUCE CONSTRUCTION EMISSIONS. THE VEHICLE MILES TRAVELED INCREASE FROM PROJECT OPERATION IS LESS THAN THE PROJECT'S PROJECTED POPULATION INCREASE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Development facilitated by the project would involve activities that result in air pollutant emissions. Construction activities such as demolition, grading, construction worker travel, delivery and hauling of construction supplies and debris, and fuel combustion by on-site construction equipment would generate pollutant emissions. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants, particularly during site preparation and grading. The extent of daily emissions, particularly ROG and NO_x emissions, generated by construction equipment, would depend on the quantity of equipment used and the hours of operation for each project. The extent of PM_{2.5} and PM₁₀ emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting excavated materials offsite is necessary. Dust emissions can lead to both nuisance and health impacts. According to the 2022 BAAQMD *CEQA Air Quality Guidelines*, PM₁₀ is the greatest pollutant of concern during construction (BAAQMD 2023).

As discussed above, BAAQMD's 2022 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutant emissions that would apply to the project. However, the guidelines include project-level thresholds for construction emissions. If an individual project's construction emissions fall below the project-level thresholds, the project's impacts on regional air quality would be individually and cumulatively less than significant. The BAAQMD has also identified feasible fugitive dust control measures for construction activities. These Basic Best Management Practices for Construction-Related Fugitive Dust Emissions are recommended for all projects (BAAQMD 2023). In addition, the BAAQMD and CARB have regulations that address the handling of hazardous air pollutants such as lead and asbestos, which could be aurally disbursed during demolition activities. BAAQMD rules and regulations address both the handling and transport of these contaminants.

Construction of future development envisioned under the project would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution concentrations or air quality nuisances. To promote clean air quality to protect public health and safety and to mitigate adverse air quality impacts, the City would require development facilitated by the project to implement Policy CON 2.5 from the Conservation Element of the General Plan, which requires implementation of feasible measures to reduce construction emissions associated with buildout of the project. Policy CON 2.5 includes the existing BAAQMD dust abatement measures intended to reduce construction and operational emissions for ROG, NO_x, and particulate matter. BAAQMD recommends that proposed projects implement these Basic Best Management Practices for Construction-Related Fugitive Dust Emissions, outlined below.

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
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. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 miles per hour.
7. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
8. Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
9. Publicly visible signs shall be posted with the telephone number and name of the 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 General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

Development facilitated by the project would adhere to the goals and policies of the General Plan during construction of individual development projects. General Plan Policy CON 2.5 encourages cooperation with the BAAQMD to meet air quality standards and requires incorporation of the above BAAQMD Basic Construction Mitigation Measures into development projects in the City. This includes standards to reduce fugitive dust emissions from construction activities, consistent with the BAAQMD CEQA Air Quality Guidelines, such as watering and covering stockpiles. With adherence to the BAAQMD Basic Construction Mitigation Measures, fugitive dust emissions (PM_{10} and $PM_{2.5}$) would be reduced to a less than significant impact. Therefore, with adherence to these General Plan policies, impacts related to construction emissions would be less than significant.

Operation

As shown in Section 4.2.1, *Setting*, Table 4.2-1, the SFBAAB is in non-attainment for federal standards of ozone and $PM_{2.5}$ and in non-attainment for the State standard for ozone, $PM_{2.5}$, and PM_{10} . The SFBAAB is in attainment of all other federal and State standards. According to the BAAQMD 2022 *CEQA Air Quality Guidelines*, the threshold for criteria air pollutants and precursors requires an assessment of the rate of increase of plan VMT and population.

Table 4.2-4 summarizes the net increase in population versus VMT. The project is projected to accommodate a population increase of approximately 1,800 persons as discussed in Section 2, *Project Description*. The project would generate an estimated daily VMT of 16,555,100 miles countywide in the year, which is an increase of approximately 18 percent compared to baseline conditions (14,016,500 miles). The anticipated increase in VMT from buildout of the proposed project would result from development facilitated by the project.

Table 4.2-4 Net Increase in Project Population Versus VMT

Scenario	Existing	Project Buildout	Net Increase	Percentage Change
Population	7,303	9,103	1,800	25%
VMT (Countywide)	14,016,500	16,555,100	5,100	18%

Source: Appendix E

Because the VMT associated with project buildout would increase by approximately 18 percent, it would not exceed the forecasted population rate of increase of approximately 24 percent. VMT increases at a lower percentage because the proposed project would change land uses to concentrate growth and residences to jobs and services to reduce singular vehicle trips and encourage alternative models of travel. Therefore, impacts concerning mobile criteria pollutants generated from operation of the project would be less than significant.

Mitigation Measure

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold 3: Would the proposed project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT MAY EXPOSE SENSITIVE RECEPTORS TO ADDITIONAL SOURCES OF TOXIC AIR CONTAMINANTS (TAC). HOWEVER, ADHERENCE TO POLICIES IN THE GENERAL PLAN WOULD MINIMIZE HEALTH RISKS FROM SOURCES OF TAC EMISSIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Pursuant to the recent ruling in the *California Building Industry Association (CBIA) v BAAQMD* (2015), impacts of the environment on the project is not an impact under CEQA. Nonetheless, BAAQMD's CEQA Guidelines include methodology for jurisdictions wanting to evaluate the potential impacts from placing sensitive receptors proximate to major air pollutant sources. For assessing community risk and hazards for siting a new receptor, sources within a 1,000-foot radius of a project site are typically considered. Sources are defined as freeways, high volume roadways with 10,000 vehicles or more per day and permitted sources (BAAQMD 2017b).

Development facilitated by the project could accommodate a net increase in residential, commercial, and office development, in mixed-use neighborhoods. The overall net increase in land use types could result in additional sources of TACs. Therefore, the project could increase the number of stationary or permitted sources that emit TACs in proximity to sensitive receptors in Cotati.

Additionally, there are several high-volume highways and roadways in and around Cotati, including United States Highway 101 (US 101) (108,200 annual average daily trips [Caltrans 2017]) and East Cotati Avenue (12,250 average daily traffic [Appendix E]). The project would facilitate the construction of residences along East Cotati Avenue.

Development facilitated by would adhere to the goals and policies of the General Plan. To minimize health risks to sensitive receptors near stationary sources and/or freeways and high-volume

roadways, the General Plan includes Policies CON 2.2 and CON 2.3, which support implementation of feasible measures to reduce TAC emissions associated with buildout of the project. In addition, the following policies from the Land Use and Economic Vitality Elements of the General Plan, re-enforce the need for compatible land uses to reduce exposure to environmental hazards.

Policy EV 1.13: Ensure that commercial and industrial uses are properly designed, constructed, and operated so as to pose no threat to the security of the population or to the property values of the community.

Policy LU 2.3: Locate residences away from areas of excessive noise, smoke, or dust, and ensure that adequate provisions, including a buffer or transitional uses, are made to ensure the health and well-being of existing and future residents.

Policy LU 3.10: Ensure that all commercial and other non-residential development is compatible with adjacent land uses, particularly residential uses.

Policy LU 3.11: Require adequate buffers and/or architectural consideration to protect residential areas, developed or undeveloped, from intrusion of nonresidential activities that may degrade the quality of life in such residential areas.

Policy CON 2.3 requires an analysis to determine if proposed or existing sources of TACs would expose sensitive receptors to potential health risks. Implementing this policy on a project-by-project basis would ensure that significant health risks are identified and mitigated, if necessary, to reduce impacts below the applicable BAAQMD thresholds. Additionally, policies from the Land Use and Economic Vitality Elements call on the City to consider land use compatibility prior to approval of proposed developments to avoid the placement of sensitive receptors near environmental hazards. As individual development facilitated by the project is evaluated on a project-by-project basis, General Plan policies would be implemented to reduce impacts and ensure that sensitive receptors would not be exposed to substantial pollutant concentrations due to location or design. Therefore, with adherence to these General Plan policies, impacts related to TAC emissions from development facilitated by the project would be less than significant.

Mitigation Measure

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold 4: Would the proposed project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-4 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD NOT INTRODUCE NEW ODOR-GENERATING LAND USES. IMPACTS RELATED TO OTHER EMISSIONS, SUCH AS THOSE LEADING TO ODORS, WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would generate oil and diesel fuel odors during construction from equipment use as well as odors related to asphalt paving. The odors would be limited to the construction period and would be temporary.

As stated in the BAAQMD *CEQA Guidelines*, land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food manufacturing plants, chemical plants, composting, refineries, landfills, and confined animal facilities. Development facilitated by the project would include residential, office, and retail development. These land uses typically do not produce objectionable odors. Other odors from buildout of the project include odor emissions that would be limited to odors associated with vehicle and engine exhaust and idling; however, odors from vehicles are not stationary and are dispersed throughout the roadway network. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

4.2.4 Cumulative Impacts

The geographic scope of the cumulative air quality analysis is the regional air basin, specifically the SFBAAB. This geographic scope is appropriate because emissions in one location affect the air quality of the entire air basin. Because odors disperse rapidly with distance, the geographic scope for cumulative odor impacts is within two miles of the project area. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future projects listed in Table 3-1 (refer to Section 3, *Environmental Setting*) located in Cotati and Rohnert Park in addition to the proposed project.

The SFBAAB is in non-attainment for federal standards of ozone and $PM_{2.5}$ and in non-attainment for the State standard for ozone, $PM_{2.5}$, and PM_{10} . The SFBAAB is in attainment of all other federal and State standards. Cumulative development would generate particulate matter and the ozone precursors (ROG and NO_x) in the area during construction and operation; therefore, cumulative impacts would be significant. As described under Impact AQ-1, development facilitated by the project would be consistent with the overall goal of the 2017 Clean Air Plan control measures as development would comply with the latest Title 24 regulations and would increase density in urban areas in proximity to transit, allowing for greater use of alternative modes of transportation. The project does not contain elements that would disrupt or hinder implementation of any 2017 Clean Air Plan control measures. In addition, the project would support the primary goals of the 2017 Clean Air Plan. Therefore, the project would not result in a considerable contribution to cumulative impacts related to conflicts with or obstruction of implementation of the applicable air quality plan.

Construction of cumulative development would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels or air quality nuisances; therefore, without mitigation, cumulative impacts would be significant. BAAQMD has identified feasible fugitive dust control measures for construction activities because fugitive PM_{10} and $PM_{2.5}$ is of concern. Development facilitated by the project would adhere to General Plan policies that require the incorporation of BAAQMD Basic Construction Mitigation Measures. Therefore, the project would not result in a considerable contribution to cumulative impacts related to construction-related criteria pollutant emissions.

Cumulative projects would result in net increases of operational VMT, which could proportionally exceed the projected population increase per the BAAQMD *CEQA Air Quality Guidelines* for operational emissions from plan-level projects. Therefore, this cumulative impact is potentially significant. As described under Impact AQ-2, the project would result in an increase of operational VMT that would not proportionally exceed the projected population increase per the BAAQMD *CEQA Air Quality Guidelines* for operational emissions from plans. Therefore, the project would not result in a considerable contribution to cumulative impacts related to operational criteria pollutant emissions.

Cumulative projects could result in TAC emissions that would be significant without implementation of project-specific mitigation measures. As identified under Impact AQ-3, development facilitated by the project would not have a significant impact from CO hotspots or TACs, as specific projects would be required to implement General Plan policies that would reduce such emissions. Therefore, the project would not expose sensitive receptors to a cumulatively considerable amount of substantial pollutant concentrations from CO hotspots or TACs and would not result in a considerable contribution to cumulative impacts related to TACs.

Cumulative projects identified in Section 3, *Environmental Setting*, do not include land uses that could result in substantial odors. Construction emissions would disperse rapidly with distance, and therefore construction projects in close proximity to the project area would not result in combined odors above those already analyzed. This cumulative impact would be less than significant.

4.3 Biological Resources

This section evaluates the potential for significant impacts to biological resources resulting from project construction and operation. The analysis in this section is based on a literature review and a site reconnaissance survey conducted by Rincon Consultants, Inc. (Rincon) in September 2023.

4.3.1 Setting

Cotati is located in central Sonoma County, within the Santa Rosa Plain. The project area is currently developed with primarily residential and commercial land uses. The SWSP parcels are developed with residential buildings, storage buildings, a parking lot serving the SMART Cotati Station, car wash, glass and mirror shop, or are currently vacant. The majority of the TOC parcels are currently developed with commercial uses and associated parking lots, with one parcel developed with a single-family residence, and a contiguous portion of two parcels undeveloped.

a. Topography and Soils

At an elevation range of approximately 110 to 125 feet above mean sea level, topography within the project area is generally flat. This is likely the result of grading due to development. The project area is within the *Cotati, California* United States Geologic Survey (USGS) 7.5-minute quadrangle.

The project area contains a single soil map unit (United States Department of Agriculture, Natural Resources Conservation Service [USDA NRCS] 2024a) defined below:

Clear Lake clay, 0 to 2 Percent Slopes: a nearly level soil consisting of a poorly drained soil that formed in basin alluvium derived from volcanic and sedimentary rock over fan alluvium derived from volcanic and sedimentary rock. These soils are on basin floors. This soil map unit is hydric. This soil map unit is included on the National Hydric Soils List (USDA NRCS 2024b).

b. Vegetation Communities and Landcover Types

Four terrestrial vegetation communities or land cover types were mapped within the project area during the field survey: urban, barren, non-native annual grassland, and Harding Grass – Reed Canary Grass Swards, depicted in Figure 4.3-1. The vegetation community characterizations for this analysis were based on the classification systems presented in *A Manual of California Vegetation*, Second Edition (Sawyer et al. 2009). Species observed during the reconnaissance survey are largely non-native and ornamental, including yellow mustard (*Brassica nigra*), Italian thistle (*Carduus pycnocephalus*), crape myrtle (*Lagerstroemia indica*), and glossy privet (*Ligustrum lucidum*). Urban landcover devoid of vegetation occurs over the majority of the project area.

Developed/Landscaped. This land cover type is not a natural vegetation community. The urban land cover type includes fully developed areas that are part of a developed urban core. This includes residential, commercial, and industrial development. Vegetation within urban areas includes lawns, landscaped gardens, park strips, and athletic fields.

Harding Grass – Reed Canary Grass Swards. This is not a natural vegetation community and includes native and non-native species in dry to seasonally moist settings. Harding grass (*Phalaris aquatica*) is a perennial grass that is widespread in California. It is typically found along roadsides, fallow agricultural fields, urban areas, and other disturbed environments. Harding grass is strongly dominant in the herbaceous layer. Scattered emergent shrubs may be present at low cover, including coyote brush (*Baccharis pilularis*), *Ceanothus* spp.) or Himalayan blackberry (*Rubus armeniacus*).

Figure 4.3-1 Vegetation Communities and Landcover Types



Upland Mustard or Star-Thistle Fields. This land cover type is not a natural vegetation community and typically occurs in highly disturbed settings. Black mustard (*Brassica nigra*) and yellow star-thistle (*Centaurea solstitialis*) are highly dominant and may be the only species present. This community typically contains few native plant species and can be invasive.

Wild Oats and Annual Brome Grasslands. This community is not a natural vegetation community and includes native and non-native grasslands in dry to seasonally moist settings outside of coastal areas. Species include but are not limited to oats (*Avena* spp.), mustard (*Brassica* spp.), bromes (*Bromus* spp.), knapweed (*Centaurea* spp.), blue wild rye (*Elymus glaucus*), California poppy (*Eschscholzia* spp.), and California goldfields (*Lasthenia californica*).

c. Special-Status Species

Data used to characterize the biological resources on and adjacent to the project area included aerial photographs, topographic maps, and accepted scientific texts to identify species. Other data on biological resources were collected from a query of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB; CDFW 2024a) and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California (CNPS 2024). The query of these data sources was conducted for the USGS *Cotati California* 7.5-minute series quadrangle and eight surrounding quadrangles. The United States Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC; USFWS 2024a), Critical Habitat Mapper (USFWS 2024b), National Wetlands Inventory (USFWS 2024c), CNDDDB Biogeographic Information and Observation System (BIOS) (CDFW 2024b), eBird (2024), and Bumble Bee Watch (The Xerces Society 2024) were also queried.

A list of special-status plant and animal species that could potentially occur in the project area was developed based on the outcome of the database queries and subsequent review by Rincon's regional biological experts for accuracy and completeness. The refined list of special-status species and sensitive natural communities was evaluated based on documented occurrences in the nine-quadrangle search area and biologists' expert opinions on species known to occur in the region. The assessment results and justification are included in Appendix B.

Assessment

Local, State, and federal agencies regulate special-status species and may require an assessment of their presence or potential presence to be conducted prior to the approval of development on a property. Assessments for the potential occurrence of special-status species are based upon species known ranges, habitat preferences, occurrence records from the CNDDDB in the project vicinity (CDFW 2024a), and previous reports for a project site. The potential for each special-status species to occur within the project area was evaluated according to the following criteria:

Not expected. Habitat on and adjacent to the project area is clearly unsuitable for the species' requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).

Low Potential. Few of the habitat components meeting the species' requirements are present, and/or the majority of habitat on and adjacent to the project area is unsuitable or of very poor quality. The species is not likely to be found in the project area.

Moderate Potential. Some of the habitat components meeting the species' requirements are present, and/or only some of the habitat on or adjacent to the project area is unsuitable. The species has a moderate probability of being found in the project area.

High Potential. All of the habitat components meeting the species' requirements are present and/or most of the habitat on or adjacent to the project area is highly suitable. The species has a high probability of being found in the project area.

Present. Species is observed in the project area or has been recorded (e.g., CNDDDB, other reports) in the project area recently (within the last 5 years).

For the purpose of this EIR, special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS or National Marine Fisheries Service (NMFS) under the federal Endangered Species Act (FESA), those listed or candidates for listing as Rare, Threatened, or Endangered under the California Endangered Species Act (CESA) or Native Plant Protection Act, those identified as Fully Protected by the California Fish and Game Code (CFGF; Sections 3511, 4700, 5050, and 5515), those identified as Species of Special Concern (SSC) or Watch List species by the CDFW, and plants occurring on lists 1 and 2 of the CNPS California Rare Plant Rank (CRPR) system per the following definitions:

Rank 1A: Plants presumed extinct in California

Rank 1B.1: Rare or endangered in California and elsewhere; seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)

Rank 1B.2: Rare or endangered in California and elsewhere; fairly endangered in California (20-80 percent occurrences threatened)

Rank 1B.3: Rare or endangered in California and elsewhere; not very endangered in California (<20 percent of occurrences threatened, or no current threats known)

Rank 2: Rare, threatened, or endangered in California but more common elsewhere

Based on the query of the CNDDDB (CDFW 2024a) and Online Inventory (CNPS 2024), there are 67 special-status plant species and 44 special-status wildlife species documented within the *Cotati, California* USGS 7.5-minute quadrangle and the eight surrounding quadrangles (Appendix B).

Special-Status Plant Species

Sixty-seven (67) special-status plant species documented in the CNDDDB for the region were evaluated for their potential to occur within the project area (see Appendix B). None of these 67 species were observed during the reconnaissance survey or would be expected to occur within the project area. Of the 67 special-status plant species, 15 special-status plant species are known to occur within 5 miles of the project area (CDFW 2024b, 2024c). However, all 67 special-status plant species could be excluded based on known ranges and elevations, the lack of natural vegetation communities in the project area, level of disturbance from landscaping maintenance, lack of connectivity to natural vegetation communities, and the species-specific habitat requirements (e.g., vernal pools, woodland and grassland communities, and serpentine or alkaline substrate).

Special-Status Wildlife Species

Rincon identified 44 special-status wildlife species that have been documented within the nine-quadrangle search radius in the CNDDDB, including Crotch's bumble bee and special-status bats (see Appendix B). None of these special-status wildlife species were observed during the reconnaissance survey. Special-status species in the vicinity are associated generally with grasslands, woodlands, riparian, and aquatic habitats (CDFW 2024d). The project area is highly developed and located within developed areas of the City, and undeveloped land within the project area consists of highly degraded and low quality habitat that does not provide substantial value to wildlife species. Due to

the lack of natural habitat, the high level of human presence, and developed areas surrounding the project area, as well as lack of aquatic habitats, all 44 species could be eliminated from evaluation as they are either not expected to occur or have a low potential to occur.

Nesting Birds

Non-game migratory birds and native birds protected under CFGC Section 3503 and the federal Migratory Bird Treaty Act (MBTA), such as native avian species common to developed and ruderal areas, have the potential to breed and forage in the project site and vicinity. Species of birds common to the area, such as California scrub-jay (*Aphelocoma californica*), black phoebe (*Sayornis nigricans*), Anna's hummingbird (*Calypte anna*), house finch (*Haemorhous mexicanus*), American crow (*Corvus brachyrhynchos*), Brewer's blackbird (*Euphagus cyanocephalus*), American bushtit (*Psaltiriparus minimus*) and other common California native bird species are likely to utilize the project area for nesting.

d. Sensitive Natural Communities

Plant communities are also considered sensitive biological resources if they have limited distributions, a high-wildlife value, include sensitive species, or are particularly susceptible to disturbance. CDFW ranks sensitive communities as "threatened" or "very threatened" and keeps records of their occurrences in the CNDDDB. The CNDDDB vegetation alliances are ranked 1 through 5 based on NatureServe's methodology (Jennings et al. 2009), with those alliances ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Some alliances with the rank of 4 and 5 have also been included in the 2023 sensitive natural communities list under the revised ranking methodology (CDFW 2024c). Four sensitive natural communities were identified within the nine-quadrangle search radius: Northern Coastal Marsh, Northern Hardpan Vernal Pool, Northern Vernal Pool, and Valley Needlegrass Grassland. However, these communities were not observed in the project area, and no other vegetation alliances that would be considered sensitive by CDFW were observed.

e. Critical Habitat

No federally designated critical habitats occur in the project area (USFWS 2024a, 2024b).

f. Jurisdictional Waters and Wetlands

No potential jurisdictional features were mapped within the project site (USGS 2024; USFWS 2024c) and none were observed during the site visit.

g. Wildlife Movement

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Other corridors may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

Habitats within a habitat linkage do not necessarily need to be identical to those habitats being linked. Rather, the linkage only needs to contain sufficient cover and forage to allow temporary

utilization by species moving between core habitat areas. Habitat linkages are typically contiguous strips of natural areas, though dense plantings of landscape vegetation can be used by certain disturbance-tolerant species. Some species may require specific physical resources (such as rock outcroppings, vernal pools, or oak trees) within the habitat link for the linkage to serve as an effective movement corridor, while other more mobile or aerial species may only require discontinuous patches of suitable habitat to permit effective dispersal and/or migration. Wildlife movement corridors may occur at either large or small scales. The California Essential Habitat Connectivity Project, commissioned by the California Department of Transportation (Caltrans) and CDFW, identifies “Natural Landscape Blocks” which support native biodiversity and the “Essential Connectivity Areas” which link them (Spencer et al. 2010).

No Natural Landscape Blocks or Essential Connectivity Areas occur within the immediate vicinity of the project area and are largely restricted to undeveloped areas of the coastal range (CDFW 2024b). Additionally, the project area is surrounded by development in the City of Cotati and City of Rohnert Park, and therefore does not function as a large- or small-scale corridor for wildlife movement.

4.3.2 Regulatory Setting

a. Federal Regulations

Federal Endangered Species Act

The USFWS and NMFS administer FESA. FESA requires each agency to maintain lists of imperiled native species and affords substantial protections to these “listed” species. The jurisdiction of the NMFS under FESA is limited to the protection of marine mammals, marine fishes, and anadromous fish. All other species are subject to USFWS jurisdiction.

The USFWS and NMFS may “list” a species if it is endangered (at risk of extinction in all or a significant portion of its range) or threatened (likely to become endangered in the foreseeable future). Section 9 of FESA prohibits the “take” of any wildlife species listed as endangered and most species listed as threatened. Take, as defined by FESA, means “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Harm is defined as “any act that kills or injures the species, including significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering” (50 Code of Federal Regulations 17.3).

FESA includes exceptions that allow an action to be carried out, even though the action may result in the “take” of listed species, where conservation measures are included for the species. Section 7 of FESA provides an exception for actions authorized (e.g., under a Section 404 permit), funded, or carried out by a federal agency and Section 10 provides an exception for actions that do not involve a federal agency.

Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act

The Migratory Bird Treaty Act authorizes the Secretary of the Interior to regulate the taking of migratory birds. The act provides that it is unlawful, except as permitted by regulations, “to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, [...] any migratory bird, or any part, nest, or egg of any such bird” (16 United States Code Section 703[a]). The Bald and Golden Eagle Protection Act is the primary law protecting eagles, including individuals and their nests and eggs. The USFWS implements the Migratory Bird Treaty Act (16 United States Code Section 703-711) and the Bald and Golden Eagle Protection Act (16 United States Code Section 668). Under the Bald

and Golden Eagle Protection Act's Eagle Permit Rule (50 Code of Federal Regulations 22.26), USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

Federal Clean Water Act, Section 404

The Clean Water Act (CWA) is the primary federal law that protects the quality of the nation's waters, including wetlands, lakes, rivers, and coastal areas. Section 404 of the CWA regulates the discharge of dredged or fill material into the waters of the U.S., including wetlands. No waters of the U.S. occur in the project area.

Federal Clean Water Act, Section 401

Under CWA Section 401, applicants for a federal license or permit to conduct activities that may result in the discharge of a pollutant into waters of the U.S. must obtain certification from the State in which the discharge would originate. Therefore, all projects that have a federal component and may affect state water quality (including projects that require federal agency approval, such as issuance of a Section 404 permit) must also comply with CWA Section 401 and the State's Porter-Cologne Water Quality Control Act. No waters of the U.S. or State occur in the project area.

b. State Regulations

California Endangered Species Act

Administered by the CDFW, CESA prohibits the take of listed species and species formally under consideration for listing ("candidate" species) in the state. CESA defines take as to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (CFGF Section 86). Under this definition, and in contrast to the FESA, CESA does not prohibit "harm" to a listed species. Furthermore, "take" under the CESA does not include "the taking of habitat alone or the impacts of the taking." However, the killing of a listed species that is incidental to an otherwise lawful activity and not the primary purpose of the activity constitutes a "take" under CESA. CESA does not protect insects, but with certain exceptions prohibits the "take" of plants on private land.

California Fish and Game Code Section 1600-1616

The CDFW has jurisdictional authority over streams, lakes, and wetland resources associated with these aquatic systems under CFGF Section 1600 et seq. CDFW has the authority to regulate work that will "substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris waste or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake" (CFGF Section 160.). No streams, lakes, or wetlands under CDFW jurisdiction occur in the project area.

California Fish and Game Code Section 3503, 3503.5, and 3511 – Native Birds

CFGF Sections 3503, 3503.5, and 3511 describe unlawful take, possession, or needless destruction of birds, nests, and eggs. Fully protected birds (Section 3511) may not be taken or possessed except under specific permit. Section 3503.5 of the Code protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs.

California Code of Regulations Section 15380 – Rare Species

Species of Special Concern (SSC) is a category used by CDFW for those species considered to be indicators of regional habitat changes or considered to be potential future protected species. SSC do not have any special legal status except that they must be considered under CEQA guidelines in the California Code of Regulations (CCR; Section 15380) as a rare species. The SSC category is intended by the CDFW for use as a management tool to include these species into special consideration when decisions are made concerning the development of natural lands.

Natural Community Conservation Planning Act

The Natural Community Conservation Planning (NCCP) Act was put in place to implement broad-based planning for effective protection and conservation of California's wildlife heritage while continuing to allow appropriate development and growth. The NCCP Act does not focus only on listed species and is broader in its orientation and objectives than the FESA or CESA. The NCCP Act encourages local, State, and federal agencies to prepare comprehensive conservation plans that maintain the continued viability of species and biological communities impacted by human changes to the landscape. The NCCP Act provides for incidental "take" authorization, such that covered activities resulting in incidental "take" of listed species may be carried out without violating CESA. Permits issued under the NCCP Act can also be broad and may include both listed species and non-listed species. No NCCPs are currently in effect or under development in Sonoma County.

Porter-Cologne Water Quality Control Act

Pursuant to Section 401 of the CWA, projects that apply for a USACE permit for discharge of dredge or fill material must also obtain water quality certification under Section 401 from the RWQCB. However, no waters of the State occur in the project area.

The CWA and associated federal regulations (40 Code of Federal Regulations 123.25[a][9], 122.26[a], 122.26[b][14][x] and 122.26[b][15]) require nearly all construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more, including smaller sites in a larger common plan of development or sale, to obtain coverage under a National Pollutant Discharge Elimination System permit for their stormwater discharges, and develop a Storm Water Pollution Prevention Plan. The National Pollutant Discharge Elimination System Program is a federal program which has been delegated to the State of California for implementation through the SWRCB and RWQCBs.

c. Local Regulations

Santa Rosa Plain Conservation Strategy

The purpose of the Conservation Strategy is threefold:

1. To establish a long-term conservation program sufficient to mitigate potential adverse effects of future development on the Plain, and to conserve and contribute to the recovery of the listed species and the conservation of their sensitive habitat;
2. To accomplish the preceding in a fashion that protects stakeholders' (both public and private) land use interests; and
3. To support issuance of an authorization for incidental take of California tiger salamander (CTS) and listed plants that may occur in the course of carrying out a broad range of activities on the Plain.

The Conservation Strategy is the biological framework upon which future regulatory actions will be based; the Strategy will not preserve the species unless implemented by the appropriate agencies. The Conservation Strategy provides the biological basis for a permitting process for projects that are in the potential range of listed species on the Plain. This is intended to provide consistency, timeliness and certainty for permitted activities. The Conservation Strategy study area is comprised of the potential CTS range and the listed plant range within the Plain. The Conservation Strategy establishes interim and long-term mitigation requirements and designates conservation areas where mitigation will occur. It describes how preserves will be established and managed. It also includes guidelines for translocation, management plans, adaptive management and funding.

Finally, the document describes the implementation planning process. USFWS will prepare a programmatic biological opinion for CTS and listed plants based on the Conservation Strategy, and potentially a future implementation plan. USFWS will also prepare a recovery plan for the Sonoma County distinct population segment of the CTS and listed plants as required by the FESA. The Conservation Strategy will be the foundation of the recovery plan; however, it does not preclude the obligation of USFWS to develop a recovery plan. Other future actions that may occur include the preparation of a Habitat Conservation Plan or Plans.

Mitigation for Listed Plants

Based on the programmatic biological opinion for the Plain issued by USFWS on July 17, 1998, projects filling potential endangered plant habitat must mitigate by preservation of an equal acreage of existing occupied habitat on a 1:1 ratio. For sites that have documented extant population(s) of an endangered plant, projects are required to preserve existing occupied habitat on a 2:1 basis. Generally, mitigation under the programmatic biological opinion must occur within the same conservation unit in which the impacts occur.

Projects Where Presence of California Tiger Salamander is Not Likely

Impact to CTS is not likely on some lands beyond 1.3 miles from breeding sites, or on lands within 1.3 miles from breeding sites that are surrounded by significant barriers or are otherwise unsuitable CTS habitat. Neither surveys nor mitigation would be required for projects on these properties. No CTS mitigation or surveys will be required for projects outside of the potential CTS range. USFWS has issued letters to particular project proponents stating their determination that the projects are unlikely to affect CTS; therefore, no mitigation would be required. The terms in any letters issued by USFWS prior to completion of the Conservation Strategy will apply to these projects.

City of Cotati General Plan

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.

Goal CON 1: Protect and Enhance Cotati's Ecosystem and Natural Habitats

Objective CON 1A: Protect Cotati's Natural Setting and Habitat for Sensitive Plant and Animal Species

Policy CON 1.3: Attempt to resolve conflicts between sensitive habitat areas and adjoining urbanized lands in a manner which recognizes the public interests in both resource protection and the need to provide for residential and job-generating land uses.

Policy CON 1.5: Conserve existing native vegetation where possible and integrate plant species native to the region into development and infrastructure projects where appropriate.

Policy CON 1.6: Avoid removal of large, mature trees that provide wildlife habitat or contribute to the visual quality of the environment to the greatest extent feasible through appropriate project design and building siting. If full avoidance is not possible, prioritize planting of replacement trees on-site over off-site locations.

Goal CON 3: Promote Conservation of Energy and Other Natural Resources

Objective CON 3D: Enhance Cotati's present landscaping in a visually pleasing manner while promoting energy efficiency, water conservation, and native plants

Policy CON 3.13: Continue to implement the City's Tree Preservation and Protection Ordinance (Chapter 17.54 of the Municipal Code).

Policy CON 3.18: The natural paths of creeks should not be disrupted as a consequence of development.

City of Cotati Municipal Code

The trees of Cotati, particularly native oaks and other tree species common to oak woodlands, are significant community resources that play an important role in defining the character of the city. The trees within the city serve as wildlife habitat, assist in energy conservation by providing shade, and provide other environmental values. Chapter 17.54.020 of the Cotati Municipal Code provides regulations for the protection, preservation, and maintenance of native trees and their habitat value, trees of historic or cultural significance, groves and stands of mature trees, and mature trees in general that are associated with proposals for development. It is also the intent of Chapter 17.54.020 of the Cotati Municipal Code to perpetuate the community tree canopy through the replacement of trees removed through development.

Chapter 17.54.020 of the Cotati Municipal Code requires a tree permit prior to any activity that may cause the destruction of a tree including relocation of any tree and grading or other ground disturbing activities within the protected zone of a tree. Developed parcels with multiple dwellings or nonresidential structures must seek a tree permit for the removal of trees other than native oaks from. Removal of trees on vacant parcels shall not be granted except in conjunction with approval for a discretionary project, building permit, or subdivision improvement plans on the same parcel.

Chapter 17.54.050 of the Cotati Municipal Code details the methods and requirements for tree planting replacement including the extent and type of replacement trees, suitable locations for planting, and the source and size of replacement trees. If tree replacement is not feasible or undesirable to the city, the applicant may pay an in-lieu fee covering the cost of purchasing, planting, irrigating, and maintaining each tree for a period of ten years.

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds

The impact analysis is based on the existing biological resources documented by Rincon's reconnaissance survey and literature review of CDFW's CNDDDB, CDFW's BIOS, USFWS's Critical Habitat Portal, and CNPS's Inventory of Rare and Endangered Plants of California, described above.

Project impacts to biological resources are focused upon rare, threatened, endangered species, or other species as defined by *CEQA Guidelines* Section 15380.

According to Appendix G of the *CEQA Guidelines*, a proposed project would have a significant impact on biological resources if the project would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service;
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Interfere substantially (i.e., direct/indirect reduction) 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;
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Impact BIO-1 THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON SPECIAL-STATUS ANIMAL SPECIES. HOWEVER, DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN ADVERSE EFFECTS TO NESTING BIRDS DIRECTLY THROUGH NEST DESTRUCTION DURING CONSTRUCTION OR CONSTRUCTION-RELATED DISTURBANCE. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

The literature review and database searches identified 67 special-status plant species and 44 special-status wildlife species that have the potential to occur within the nine-quad search radius. None of these species are expected to occur or have a low potential to occur. None of these species, including those with a low potential to occur, were identified during the reconnaissance survey. Neither habitats associated with these species nor species-specific ecological requirements were present within the project area.

Non-game migratory birds and native birds protected by CFGC Section 3503 and the MBTA are likely to nest within existing trees, shrubs, and on buildings within the project area. Development facilitated by the project may result in tree removal, which would impact nesting birds if active nests are present on site, through nest abandonment or destruction. Impacts may also occur if active nests are present in undeveloped and landscaped areas adjacent to active construction or staging through disturbance and nest abandonment. Therefore, impacts would be potentially significant.

Mitigation Measures

BIO-1 Nesting Bird Survey

If construction is scheduled to occur during the nesting bird season (February 1 through August 31), the project applicant shall retain a qualified biologist to conduct a pre-construction nesting bird survey no more than 14 days prior to the start of construction to determine the presence/absence of nesting birds and raptors within the project sites and adjacent areas. The survey shall include the entire site plus a 100-foot buffer, as accessible. If active nests are found, the qualified biologist shall establish an appropriate avoidance buffer, considering the species sensitivity and physical location of the nest (line of site to the work area), to comply with CFGC 3503 and 3503.5. In no case shall the buffer be smaller than 50 feet for non-raptor bird species and 250 feet for raptor species. To prevent encroachment, the established buffer(s) shall be clearly marked by high visibility material installed by the contractor. The established buffer(s) shall remain in effect until the young have fledged or the nest has been abandoned as confirmed by the qualified biologist. The City shall review and approve the biologists' findings and buffer during construction as appropriate.

Significance After Mitigation

Implementation of Mitigation Measure BIO-1 requires pre-construction nesting bird survey, which would establish avoidance buffers around nesting birds. This measure would reduce impacts from construction activities on nesting birds to a less than significant level.

Threshold 2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Impact BIO-2 THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY. THERE WOULD BE NO IMPACT.

The review of the resource agency databases for sensitive natural communities within the nine USGS quadrangles containing and surrounding the project site identified four sensitive natural communities: Northern Coastal Marsh, Northern Hardpan Vernal Pool, Northern Vernal Pool, and Valley Needlegrass Grassland. However, none of these communities are present within or adjacent to the project area, nor are other sensitive natural communities. No adverse effect on sensitive natural communities would occur as a result of development facilitated by the project.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

No impact would occur.

Threshold 3: Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact BIO-3 THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON STATE OR FEDERALLY PROTECTED WETLANDS. THERE WOULD BE NO IMPACT.

Based on the literature review and reconnaissance survey, no wetlands or other potentially jurisdictional features occur within or adjacent to the project area. No impacts to jurisdictional wetlands or waters would occur.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

No impact would occur.

Threshold 4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact BIO-4 THE PROJECT WOULD NOT 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. THERE WOULD BE NO IMPACT.

The project area consists of developed and disturbed areas with primarily ornamental vegetation. Land use in the vicinity is primarily residential and commercial with no connectivity to natural habitats and is therefore not expected to support wildlife movement. The project area does not contain suitable natural areas that would contribute to a migratory corridor for wildlife. No impacts to wildlife movement corridors would occur as a result of development facilitated by the project.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

No impact would occur.

Threshold 5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact BIO-5 THE PROJECT WOULD NOT CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Some trees would be removed as a result of project implementation. The project applicant would be required to comply with the City of Cotati Municipal Code chapter 17.54 for removal of native trees and their habitat value, trees of historic or cultural significance, groves and stands of mature trees, and mature trees in general that are associated with proposals for development. This would include

a review of tree removal plans and landscape plans by the City during the project design review. Pursuant to approval of the tree removal permit and planting of replacement trees on-site, the project would not conflict with local policies or ordinances protecting protected trees. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold 6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact BIO-6 THE PROJECT WOULD NOT CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN. THERE WOULD BE NO IMPACT.

The project area occurs within the Santa Rosa Plain Conservation Strategy Study Area in an established Urban Growth Boundary designated as Already Developed (no potential for impact). The project area does not occur within any other Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts would occur.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

No impact would occur.

4.3.4 Cumulative Impacts

The geographic scope for cumulative biological resources impacts includes the areas surrounding the project area, including the incorporated City of Rohnert Park and unincorporated Sonoma County lands within approximately 10 miles of Cotati. This geographic scope is appropriate for biological resources because it encompasses the mosaic of representative land cover and habitat types (and associated biological resources) affected by the project, including primarily urban, residential, commercial, and industrial development with areas of natural habitats.

The planned and pending projects in the project vicinity are listed in Table 3-1 of Section 3, *Environmental Setting*. Cumulative development could contribute to the loss of habitat for special-status species and the decline of special-status species, cause further fragmentation of habitat and isolation of populations, and decrease movement opportunities. Together, cumulative projects could result in the degradation of the suite of habitat types and associated biological resources, including special-status plant and wildlife species, that occur within the cumulative setting and could result in overall diminished regional ecological functions and values. Impacts to biological resources would most likely be mitigated on a project-by-project basis. However, permanent losses of

sensitive habitats, including sensitive natural communities and listed species, would be a potentially significant cumulative impact.

Project implementation would alter the open nature of the portions of the project area that are currently undeveloped to residential uses and alter the intensity of existing land uses, although the project area only supports marginal habitat, and does not contain sensitive habitat. However, the project would have no impact to riparian habitat, sensitive natural communities, protected wetlands, wildlife movement, or wildlife nursery sites. The presence of mature trees in the project area could result in project-level impacts to nesting birds; however, Mitigation Measure BIO-1 would reduce this impact to a less than significant level. In addition, any trees removed as a result of the project would be replaced as required by the Cotati Municipal Code. As such, the project's contribution to cumulative impacts would not be cumulatively considerable.

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4.4 Cultural Resources

This section assesses potential impacts on archaeological resources, historical resources, and human remains, related to implementation of the proposed project. Tribal cultural resources are discussed in Section 4.14, *Tribal Cultural Resources*.

4.4.1 Setting

a. Indigenous History

The project area lies in the southern portion of the Northwest Coast archaeological region, known as the Russian River subregion (Moratto 1984). According to Hildebrandt (2007), the prehistoric cultural chronology for the area can be generally divided into four periods: The Pleistocene-Holocene Transition (circa 11,500-8,000 BCE) the Early Holocene (8,000-5,000 BCE), Middle Holocene (5,000-2,000 BCE), Late Holocene (2,000 BCE – Contact).

Pleistocene-Holocene Transition (11,500-8,000 BCE)

The data gathered regarding initial human occupation of the region is categorized as the Post Pattern. The earliest known archaeological finds in the Northwest Coast region are fluted Clovis-like points and chipped stone crescents. Limited finds dating to this time period have been made, including Post Pattern sites near Clear Lake and Cache Creek in Lake County and isolated finds in Mendocino County and at Bodega Head (Hildebrandt 2007). The earliest represented site in the Russian River subregion is CA-LAK-36, dating to approximately 10,000 BCE and located approximately 35 miles northeast of the project area (Moratto 1984).

Early Holocene (8,000-5,000 BCE)

In Northwest Coast, the Early Holocene is characterized by the Borax Lake Pattern and the Berkeley Pattern. The Borax Lake Pattern is typically represented by large wide-stemmed projectile points, serrated bifaces, ovoid flake tools, hand stones, and millingslabs. No faunal or floral remains have been identified at Borax Lake Pattern sites, so diet composition remains unclear (Hildebrandt 2007). The Borax Lake Pattern is found throughout the Northwest Coast region and among several environmental contexts, including ridge tops (CA-HUM-573, CA-HUM-367), terraces (CA-TRI-1008), the Clear Lake Basin (CA-MEN-1711), and the Santa Rosa Plain (CA-SON-20) (Hildebrandt 2007).

Middle Holocene (5,000-2,000 BCE)

In the Northwest Coast region during this period, the Mendocino Pattern is common throughout the area and is categorized by side-notched, corner-notched, and concave-base points and a variety of other stone tools. Changes moving toward the Berkeley Pattern take place around 6500 BCE but persist into this period. The Berkeley Pattern is characterized by elaborate points, bone tools, contracting and square-stem points, baked clay items, and mortars and pestles. The use of pestles was primarily used for acorn processing (Hildebrandt 2007). Most sites dating to this period are hunting camps or short-term forager residential areas, several of which were found along the Russian River (CA-SON-572, CA-SON-568, and CA-SON-547), within the Santa Rosa Plain (CA-SON-456 and CA-SON-960), or within the Clear Lake Basin (CA-LAK-72, CA-LAK-261, and CA-LAK-510) (Hildebrandt 2007).

Late Holocene (2,000 BCE-Contact)

During the Late Holocene, the Northwest Coast Russian River subregion includes sites representative of the Augustine Pattern, with some sites showing a revival of the Berkeley Pattern in 1200 BCE after a hiatus in the archaeological record. The Augustine Pattern is characterized by corner-notched projectile points and ornate ceremonial and decorative objects (Hildebrandt 2007). The archaeological record exhibits a high degree of diversity in material culture patterns, site types, and degrees of sedentism. Seasonal Augustine Pattern sites have been identified along the Sonoma County Coast, though researchers have argued for a more sedentary settlement system inland (Hildebrandt 2007).

b. Post-Contact Setting

Post-Contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769-1822)

Spanish explorers made sailing expeditions along the coast of California between the mid-1500s and mid-1700s. Juan Rodriguez Cabrillo in 1542 led the first European expedition to observe what was known by the Spanish as Alta (upper) California. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968; Rolle 2003). The Spanish crown laid claim to Alta California based on the surveys conducted by Cabrillo and Vizcaíno (Bancroft 1885; Gumprecht 1999).

By the 18th century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts known as presidios, as well as missions and pueblos (towns) throughout Alta California. The 1769 overland expedition by Captain Gaspar de Portolá marks the beginning of California's Historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. Portolá established the Presidio of San Diego as the first Spanish settlement in Alta California in 1769. Franciscan Father Junípero Serra also founded Mission San Diego de Alcalá that same year, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823 (Mission San Diego 2024).

Construction of missions and associated presidios was a major emphasis during the Spanish Period in California to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns; just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities (San José and Los Angeles) (Rolle 2003).

Spain began making land grants in 1784, typically to retiring soldiers, although the grantees were only permitted to inhabit and work the land. The land titles technically remained property of the Spanish king (Livingston 1914).

Mexican Period (1822-1848)

Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Dallas 1955).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land (Milliken et al. 2009).

Cotate Rancho was a 17,234-acre land grant awarded to Captain Juan Castaneda in 1844 (General Land Office 1857). Castaneda played a vital role in the 1838 Battle of San Buenaventura. The Rancho encompassed present-day Cotati, Rohnert Park, and Penngrove. At that time, the Sonoma County region marked the northernmost frontier of Mexican territory, and was an area the Mexican government was anxious to establish a hold on, because it was being eyed for takeover by several nations. Castaneda was not able to find any laborers to develop the rancho, because few Californios or Americans ventured that far north. He opted to sell the rancho before losing the land grant. He sold it to U.S. Consul Thomas Larkin in 1846, who owned it until 1849. He, in turn, sold it to Thomas Ruckle, who held it for only two months before selling it to Dr. Thomas Stokes Page, a native of New Jersey who lived in Valparaiso, Chile, at the time of the sale (DeClercq 1978).

American Period (1848-Present)

The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period. The same year, gold was discovered at Sutter's Mill on the American River. By 1849, nearly 90,000 people had ascended upon the gold fields. California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as US territories (Library of Congress 2024). During the latter part of the nineteenth century, there was a notable trend toward the division of large land holdings in Sonoma County for agricultural uses.

After nearly a decade of negotiating Spanish, Mexican, California, and United States land law, Dr. Page was issued a patent for the Cotate Rancho in 1858 and his agents purchased livestock, constructed ranch buildings, and began farming for the largely absentee landlord. Dr. Page arrived on the ranch in 1869 (though he and his family lived in San Francisco). The Cotate Rancho remained relatively intact during Page's lifetime despite the fact that some 4,500 acres of land was siphoned off by squatters, some of whom eventually paid Page for their land (Reynolds and Proctor 1898). He died in 1872, leaving management of the rancho to his oldest sons, and stipulated the ranch could not be subdivided until his youngest son, William, reached the age of 25. His heirs retained possession of 10,000-acre portion of the ranch until 1892 when William turned 25. At that time, the land was subdivided and sold by a Page family interest, the Cotati Land Company. The corrupted spelling "Cotati" was adopted to more closely align with non-Spanish speakers' pronunciation of the original name, Cotate (Cotati Historical Society 2024).

c. Local History

The establishment of Cotati's earliest institutions followed soon after land sales commenced. In 1893, the community established a post office and school. Within the first decade of the twentieth century, Cotati boasted two churches, serving Congregational and Catholic adherents, and two social halls, the Cotati Women's Club and the Odd Fellows Hall (Cotati Historical Society 2024).

Early commercial development clustered around the Plaza (at the corner of present-day Old Redwood Highway and East Cotati Avenue), serving a local population consisting largely of area chicken farmers. In 1915, the State of California routed the Petaluma-Santa Rosa Highway adjacent to the Plaza. As motorists increasingly passed through the area, commercial development around the Plaza expanded to form a sizeable business district that included garages, automobile dealerships, and restaurants, in addition to businesses primarily satisfying local demand, such as general stores and feed stores (Cotati Historical Society 2024).

The Post-World War II Era brought significant change to Cotati. The agricultural economy underwent a major shift as local independent chicken farms increasingly sold their properties to agribusiness or real estate firms. As subdivisions grew in the early 1950s, the community, still unincorporated, established a Public Utility District for the provision of water and sewer services. Witnessing the rapid growth of neighboring Rohnert Park, Cotati residents voted to incorporate as a city in 1963, primarily to maintain the community's independent, rural character. In the 1970s, that character appealed to many students of the then-recently established Sonoma State University (founded in 1960, but relocated to its permanent location in 1966), many of whom resided in the city. So-called hippies who moved to the area in the 1970s left a mark on the city, most notably in the establishment of Inn of the Beginning, a restaurant that hosted rock and blues concerts (Cotati Historical Society 2024).

Cotati's population growth in the 1970s signaled the city's relatively rapid urbanization. After expanding from approximately 1,300 to 3,300 residents between 1970 and 1980, new residents continued to settle in the city in the following decades, albeit at a less rapid pace. Today, Cotati has a population of approximately 7,500.

d. Existing Conditions

This section analyzes the project's potential impacts related to cultural resources, including historical and archaeological resources as well as human remains. The analysis in this section is based, in part, on the Confidential Cultural Resources Technical Report prepared from the project by Rincon in September 2024. The investigation included a cultural resources records search of the California Historical Resources Information System (CHRIS), a Sacred Lands File (SLF) search, historic evaluations of five historic-age properties, and a pedestrian field survey of the SWSP parcels.

The NWIC record search identified four cultural resources with a 0.5-mile radius of the project area. Of these resources, three are recorded within the SWSP parcels and one is recorded adjacent to the SWSP parcels. None were recorded within or adjacent to the TOC parcels. All resources were historic-period buildings. The City requested a review of the Sacred Lands File (SLF) and received a response from the Native American Heritage Commission (NAHC) on November 14, 2023, indicating that the project area is negative for Sacred Lands.

No archaeological resources were observed during the pedestrian field survey of the SWSP parcels. The background research identified that four of the TOC parcels and five of the SWSP parcels are of historic age, or more than 45 years old, the age threshold which generally triggers the need for historic resources evaluation. The SWSP parcels with age-eligible properties were recorded and

evaluated for National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) eligibility. As a result of the study, four properties, 955 East Cotati Avenue, 1015 East Cotati Avenue, 1038 East Cotati Avenue, and 8360 Santero Way are recommended ineligible for listing in the NRHP and CRHR and are therefore not considered historical resources for the purposes of CEQA.

One built environment resource feature within the SWSP parcels at 970 East Cotati Avenue includes the railroad communications box that was determined eligible for the NRHP by the California Office of Historic Preservation through consensus for a Section 106 project and is listed in the CRHR. The field survey confirmed it retains sufficient integrity for listing and therefore qualifies as a historical resource pursuant to CEQA.

4.4.2 Regulatory Setting

a. Federal Regulations

National Register of Historic Places

Although the project does not have a federal nexus, properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR. The following is therefore presented to provide applicable regulatory context. The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects. Per 36 CFR Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

- Criterion A:** Is associated with events that have made a significant contribution to the broad patterns of our history
- Criterion B:** Is associated with the lives of persons significant in our past
- Criterion C:** Embodies the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction
- Criterion D:** Has yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows:

- Location:** The place where the historic property was constructed or the place where the historic event occurred
- Design:** The combination of elements that create the form, plan, space, structure, and style of a property
- Setting:** The physical environment of a historic property
- Materials:** The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory

Feeling: A property's expression of the aesthetic or historic sense of a particular period of time

Association: The direct link between an important historic event or person and a historic property

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance (National Park Service 1997:41). Properties which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

b. State Regulations

California Environmental Quality Act

California Public Resources Code (PRC) Section 21804.1 requires lead agencies to determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a historical resource is a resource listed in, or determined eligible for listing in, the CRHR, a resource included in a local register of historical resources or identified in a historical resources survey pursuant to PRC Section 5024.1(g), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or culturally significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the NRHP are automatically listed in the CRHR and are, therefore, historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a "unique archaeological resource" as identified in PRC Section 21083.2. PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, 2) has a special and particular quality such as being the oldest of its type or the best available example of its type, or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource does not qualify as a historical or unique archaeological resource, the impacts of a project on those resources will be less than significant and need not be considered further (*CEQA Guidelines* Section 15064.5[c][4]). *CEQA Guidelines* Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

According to CEQA, an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse

change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner of those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (*CEQA Guidelines* Section 15064.5[b][2][A]).

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a][b]).

CEQA Guidelines Section 15126.4 stipulates an EIR shall describe feasible measures to minimize significant adverse impacts. In addition to being fully enforceable, mitigation measures must be completed within a defined time period and be roughly proportional to the impacts of the project. Generally, a project which is found to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards) is considered to be mitigated below a level of significance (*CEQA Guidelines* Section 15126.4 [b][1]). For historical resources of an archaeological nature, lead agencies should also seek to avoid damaging effects where feasible. Preservation in place is the preferred manner to mitigate impacts to archaeological sites; however, data recovery through excavation may be the only option in certain instances (*CEQA Guidelines* Section 15126.4[b][3]).

California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Sections 5024.1 and 4852. The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1[a]). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (PRC Section 5024.1[b]). Unlike the NRHP however, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (California Office of Historic Preservation 2011). Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (California Office of Historic Preservation 2011). Generally, the California Office of Historic Preservation recommends resources over 45 years of age be recorded and evaluated for historical resources eligibility (California Office of Historic Preservation 1995:2).

A property is eligible for listing in the CRHR if it meets one of more of the following criteria:

- Criterion 1:** Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
- Criterion 2:** Is associated with the lives of persons important to our past
- Criterion 3:** Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
- Criterion 4:** Has yielded, or may be likely to yield, information important in prehistory or history

California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined if the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification.

California Public Resources Code Section 5097.98

Section 5097.98 of the California Public Resources Code states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the most likely descendant) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the most likely descendant may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The most likely descendant shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

c. Local Regulations

City of Cotati General Plan

The General Plan for the City of Cotati, which was adopted in 2015, includes goals and policies relating to cultural resources (City of Cotati 2015). As presented in the Conservation Element, goals and policies pertaining to cultural resources include:

Goal CON 4: Protect and Preserve Cotati's Historic and Cultural Resources

Objective CON 4A: Protect Native American Resources and Heritage

Policy CON 4.1: Review proposed developments and work in conjunction with the California Historical Resources Information System, Northwest Information Center at Sonoma State University, to determine whether project areas contain known archaeological resources, either prehistoric and/or historic-era, or have the potential for such resources.

Policy CON 4.2: Ensure that human remains are treated with sensitivity and dignity, and ensure compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.

Policy CON 4.3: Work with Native American representatives to identify and appropriately address, through avoidance or mitigation, impacts to Native American cultural resources and sacred sites during the development review process.

Policy CON 4.4: Consistent with State local and tribal intergovernmental consultation requirements such as SB18, the City shall consult with Native American tribes that may be interested in proposed new development and land use policy changes.

Action CON 4a: Work with the Federated Indians of the Graton Rancheria to prepare a narrative description of the Native American background of the Cotati area and request the Federated Indians of the Graton Rancheria provide pictorial examples of the types of Native American resources present in the vicinity. Place this description on the City's website as a link under the History of Cotati section.

Action CON 4b: Require a cultural and archaeological survey prior to approval of any development project where a potential or known historical, archaeological, or other cultural resource is located or which would require excavation in an area that is sensitive for cultural or archaeological resources. If significant cultural or archaeological resources, including historic and prehistoric resources, are identified, the project shall be required to implement appropriate measures, such as avoidance, capping of the resource site, or documentation and conservation, to reduce adverse impacts to the resource to a less than significant level.

Action CON 4c: Require all development, infrastructure, and other ground-disturbing projects to comply with the following conditions in the event of an inadvertent discovery of cultural resources or human remains:

- a. If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Department shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Department.
- b. If human remains are discovered during any ground disturbing activity, work shall stop until the Community Development Department and the County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) and the most likely descendants have been consulted; and work may only resume when appropriate measures have been taken and approved by the Community Development Department.

Action CON 4d: Continue to invite the Federated Indians of the Graton Rancheria, as well as other recognized tribes that express interest, to comment on City projects as part of the environmental review process.

Objective CON 4B: Protect Important Historic Resources and Use these Resources to Promote a Sense of Place and History in Cotati

Policy CON 4.5: Encourage the voluntary identification, conservation, and reuse of historical structures, properties, and sites with special and recognized historic, architectural, or aesthetic value.

Policy CON 4.6: Encourage historic resources to remain in their original use whenever possible. The adaptive use of historic resources is preferred, particularly as museums, educational facilities, or visitor-serving uses, when the original use can no longer be sustained. Older residences may be converted to office/retail use in commercial areas and to tourist or business use, so long as their historical authenticity is maintained or enhanced.

Policy CON 4.7: Leverage the City's strong cultural and historic heritage to support and encourage historically-oriented visitor programs and heritage tourism through cooperation with local, regional, and state marketing efforts.

4.4.3 Impact Analysis

a. Significance Thresholds and Methodology

If a project may cause a substantial adverse change in the characteristics of a resource that convey its significance or justify its eligibility for inclusion in the CRHR or a local register, either through demolition, destruction, relocation, alteration, or other means, then the project would have a significant effect on the environment (*CEQA Guidelines* Section 15064.5[b]). Appendix G of the *CEQA Guidelines* indicates that a project's impacts to cultural resources would be significant if the project would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
3. Disturb any human remains, including those interred outside of formal cemeteries.

Threshold 1 broadly refers to historical resources. To more clearly differentiate between archaeological and built environment resources, analysis under Threshold 1 has been limited to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to Section 15064.5 and those that may be considered unique archaeological resources pursuant to Section 21083.2, are considered under Threshold 2.

Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources within the project area, assessing the significance of the resources that may be affected, and determining the appropriate mitigation. Removal, demolition, or alteration of historical resources can permanently impact the historic fabric of an archaeological site, building, structure, or historic district.

The State Legislature, in enacting the CRHR, amended CEQA to clarify which properties are significant, as well as which project impacts are considered to be significantly adverse. A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have significant effect on the environment (*CEQA Guidelines* Section 15064.5[b]). A substantial adverse change in the significance of a historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5[b][1]).

The *CEQA Guidelines* further state that "[t]he significance of an historical resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in the California Register... local register of historic resources... or its identification in an historic resources survey." As such, the test for determining whether or not the project will have a significant impact on identified historical resources is whether it will materially impair physical integrity of the historic resource such that it could no longer be listed in the CRHR or a local landmark program.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact CUL-1 DEVELOPMENT FACILITATED BY THE PROJECT COULD CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A HISTORICAL RESOURCE. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The field survey and background research identified that four of the TOC parcels and five of the SWSP parcels contain built environment features that are of historic age. The five age-eligible SWSP parcels, located at 955 East Cotati Avenue, 970 East Cotati Avenue, 1015 East Cotati Avenue, 1038 East Cotati Avenue, and 8360 Santero Way, were recorded and evaluated for eligibility in the NRHP and the CRHR. As a result of this study, 955 East Cotati Avenue, 970 East Cotati Avenue, 1015 East Cotati Avenue, 1038 East Cotati Avenue, and 8360 Santero Way are recommended ineligible for listing in the NRHP and CRHR and are therefore not considered historical resources for the purposes of CEQA.

One property on a SWSP parcel, 970 East Cotati Avenue, includes the railroad communications box that was determined eligible for the NRHP in 2011 and assigned a California Office of Historic Preservation Status Code 2D2, indicating it is also listed in the CRHR. A field survey and updated evaluation confirmed the resource retains sufficient integrity to continue to be eligible for listing in the NRHP and therefore qualifies as a historical resource pursuant to CEQA. The proposed project, which includes updating land use designations to realize the vision of a residentially focused transit-oriented neighborhood does not propose any changes to the railroad communications box and would not result in the demolition or alteration of the resource that contributes to its eligibility for listing.

However, although there are no specific development projects associated with the project, implementation of the project would guide development, including rezoning non-residential sites for residential development. Potential future development facilitated by the project may include site preparation, demolition, and construction activities and could have the potential to result in the physical demolition, destruction, relocation, or alteration of potential historical resources.

Historic-aged buildings on TOC parcels, as well as parcels with buildings that may become age-eligible with the passage of time, may require further evaluation to determine if they are historical resources pursuant to CEQA and may be affected by a future project.

The City General Plan objectives (specifically Objective CON 4B) would reduce the potential for historical resources to be adversely impacted from the development facilitated by the proposed project, but there would still be potential for development to impact historical resources. This impact is potentially significant.

Mitigation Measures

CUL-1a Identification of Historical Resources

A historical resources evaluation shall be prepared for projects carried out within the project area involving the demolition or physical alteration of a building, structure, object, or other built environment feature that is 45 years of age or older, that has not been subject to evaluation as part of this study, as outlined in Table 4.4-1. The evaluation shall be prepared by a qualified architectural

historian or historian who meets the Secretary of the Interior’s Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources within the proposed development site. Properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. Evaluated properties shall be documented on applicable Department of Parks and Recreation Series 523 Forms. The report must be submitted to the City for review and concurrence. The final report must be submitted to the Northwest Information Center. If the property is already a historical resource as defined by *CEQA Guidelines* Section 15064.5(a), the historical resources evaluation described above shall not be required.

Table 4.4-1 Properties to be Evaluated

APN	Address	Build Year	Age Eligible	45 Year Threshold	Relationship to Project
144-292-023	640 East Cotati Avenue	2004	No	2049	TOC Parcel
144-292-024	680 East Cotati Avenue	c. 1983-1992*	No	2028	TOC Parcel
144-301-010	905 East Cotati Avenue	1920/1975	Yes	–	TOC Parcel
144-302-022	768 East Cotati Avenue	1954	Yes	–	TOC Parcel
144-302-050	766 East Cotati Avenue	1989	No	2034	TOC Parcel
144-501-004	556 East Cotati Avenue	1973	Yes	–	TOC Parcel
144-570-001	475 East Cotati Avenue	1984	No	2029	TOC Parcel
144-720-029	501 East Cotati Avenue	1945/1956	Yes	–	TOC Parcel
144-720-040	525 East Cotati Avenue	1994	No	2039	TOC Parcel
144-770-021 to 144-770-070	6305-7012 Santero Way	2004	No	2049	SWSP Parcel
144-302-047	930 East Cotati Avenue	1990	No	2035	SWSP Parcel
144-302-049	924 East Cotati Avenue	1994	No	2039	SWSP Parcel
144-480-008	8354 Santero Way	1987	No	2032	SWSP Parcel
144-790-001 to 144-790-016	7046 to 7062 Santero Way	2006	No	2051	SWSP Parcel

CUL-1b Treatment of Historical Resources

If a project would occur on a site containing a historical resource as identified during implementation of Mitigation Measure CUL-1a, impacts must be mitigated, to the extent feasible, to historical resources identified within a proposed development site. Application of mitigation shall be overseen by an architectural historian, historian, and/or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., avoidance).

Mitigation may include avoidance, or preservation, rehabilitation, restoration, or reconstruction of the resource consistent with the Secretary of the Interior’s Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4[b][1]). A report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards must be submitted to the City for review and approval prior to the issuance of permits.

If historical resources are identified on a development site and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken as determined by a PQS historian, architectural historian, and/or historic architect and the City. Mitigation measures may include, but are not limited to, Historic American Building Survey (HABS)-Like report, interpretive signage, and relocation. The mitigation shall be completed and submitted to the City prior to issuance of permits for demolition or alteration of the historical resource.

Significance After Mitigation

Implementation of Mitigation Measures CUL-1a and CUL-1b would reduce impacts to historical resources to the extent feasible by identifying and evaluating significant historical resources and managing avoidance, or preservation, rehabilitation, restoration, or reconstruction in compliance with the Standards as applicable. Nonetheless, even with implementation of Mitigation Measures CUL-1a and CUL-1b, eligible historical resources could still be materially impaired by future development that would be carried out under the proposed project. It is possible that a future project could result in the demolition or substantial alteration of a historical resource. Therefore, even with mitigation impacts may not be reduced to a less than significant level, and the impact would remain significant and unavoidable.

Threshold 2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
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Impact CUL-2 THE PROJECT HAS THE POTENTIAL TO CAUSE A SIGNIFICANT IMPACT ON ARCHAEOLOGICAL RESOURCES IF DEVELOPMENT FACILITATED BY THE PROJECT WOULD CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE, INCLUDING THOSE THAT QUALIFY AS HISTORICAL RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

As noted above, the Confidential Cultural Resources Technical Report did not identify archaeological resources or archaeological deposits in the project area or in the vicinity of the project. The lack of surface evidence of archaeological materials, archaeological literature, and existing level of disturbance throughout the project area (railway line, roadways, as well as industrial, commercial, and residential development), suggests there is a low potential for encountering intact subsurface archaeological deposits. However, the geoarchaeological sensitivity of the project area, inclusive of SWSP parcels and TOC parcels, is moderate, due to the presence of alluvial soils. Additionally, not all project area parcels were able to be evaluated for archaeological resources due to site access constraints, and additional investigation of the unevaluated parcels is necessary prior to future development activities on the unevaluated parcels. Therefore, impacts to archaeological resources would be potentially significant.

Mitigation Measures

CUL-2a Archaeological Resources Assessment

For future projects involving ground disturbance either on parcels not previously studied (as outlined in Table 4.4-2), on parcels previously studied but the *Santero Way Specific Plan Update Project Cultural Resources Technical Report* (Rincon Consultants, Inc. 2024) is more than five years old, and/or if conditions on the project parcel has changed substantially, the project applicant(s) shall prepare a Phase I archaeological resources assessment under the supervision of an archaeologist meeting the PQS in archaeology (National Park Service 1983). Assessments must

include a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center at Sonoma State University, Sacred Lands File search maintained by the Native American Heritage Commission, and intensive-level pedestrian survey, and archaeological sensitivity analysis. The assessment must be completed prior to project approval.

If the Phase I archaeological resources assessment identifies resources that may be affected by the project, an extended Phase I testing program, Phase II testing and evaluation, and/or archaeological monitoring may be required, as determined by the qualified archaeologist. If resources are determined significant or unique, avoidance or preservation-in-place may reduce impacts to a less than significant level. If avoidance is not possible, appropriate site-specific mitigation measures shall be identified. These measures may include, but would not be limited to, a Phase III data recovery program and curations, or other appropriate actions to be determined by a qualified archaeologist and City. The City will review and approve reports and ensure that mitigation measures are implemented as appropriate prior to or during construction.

Table 4.4-2 Parcels Not Previously Studied

APN	Address	Relationship to Project
144-292-023	640 East Cotati Avenue	TOC Parcel
144-292-024	680 East Cotati Avenue	TOC Parcel
144-301-010	905 East Cotati Avenue	TOC Parcel
144-302-022	768 East Cotati Avenue	TOC Parcel
144-302-050	766 East Cotati Avenue	TOC Parcel
144-501-004	556 East Cotati Avenue	TOC Parcel
144-570-001	475 East Cotati Avenue	TOC Parcel
144-720-029	501 East Cotati Avenue	TOC Parcel
144-720-040	525 East Cotati Avenue	TOC Parcel
144-770-021 to 144-770-070	6305-7012 Santero Way	SWSP Parcel
144-051-037	None	SWSP Parcel
144-302-047	930 East Cotati Avenue	SWSP Parcel
144-302-049	924 East Cotati Avenue	SWSP Parcel
144-310-007 to 144-310-008	None	SWSP Parcel
144-320-018	None	SWSP Parcel
144-320-026	None	SWSP Parcel
144-320-027	6050 Santero Way – Cotati SMART Station parking lot	SWSP Parcel
144-320-029	None	SWSP Parcel
144-480-008	8354 Santero Way	SWSP Parcel
144-480-015 to 144-480-017	None	SWSP Parcel
144-480-019	None	SWSP Parcel
144-770-071 to 144-770-074	None	SWSP Parcel
144-790-001 to 144-790-016	7046 to 7062 Santero Way	SWSP Parcel
144-790-COM	None	SWSP Parcel

CUL-2b Unanticipated Discoveries

In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the PQS for archaeology shall be contacted immediately to evaluate the resource. If the resource is determined by the PQS archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the PQS archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a PQS archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Section 15126.4(b)(3)(C).

Significance After Mitigation

Implementation of Mitigation Measures CUL-2a and CUL-2b would reduce impacts to archaeological resources to less than significant levels by ensuring the avoidance of archaeological resources to the extent feasible, or by identifying, evaluating, and conducting data recovery archaeological resources that may be impacted by future projects in a timely manner. With implementation of these measures, impacts to archaeological resources would be less than significant.

Threshold 3: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impact CUL-3 GROUND DISTURBANCE ASSOCIATED WITH DEVELOPMENT FACILITATED BY THE PROJECT MAY DISTURB OR DAMAGE UNKNOWN HUMAN REMAINS. ADHERENCE WITH EXISTING REGULATIONS WOULD ENSURE IMPACTS WOULD BE LESS THAN SIGNIFICANT.

No known cemeteries, formal or informal, are identified within the project area. Regulations exist to address the discovery of human remains. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. If an unanticipated discovery of human remains occurs, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a most likely descendant, who shall complete an inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access. With adherence to existing regulations, the archaeological resources mitigation measures identified above, program and project impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.4.4 Cumulative Impacts

The geographic scope for cumulative cultural resource impacts includes areas in the vicinity of the project area, including adjacent land in the cities of Cotati and Rohnert Park. This geographic scope is appropriate for cultural resources because such resources are regionally specific. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1 of Section 3, *Environmental Setting*, would have the potential to adversely impact cultural resources.

Buildout of cumulative projects would result in significant cumulative impacts to unknown historical resources. It is possible that future cumulative projects would result in impacts to known or unknown cultural resources. While impacts to such resources would be addressed on a case-by-case basis and would likely be subject to mitigation measures similar to those imposed for development facilitated by the project, cumulative development may result in the destruction of historical resources. As such, cumulative historical impacts would be significant. Development facilitated by the project would implement Mitigation Measures CUL-1a and CUL-1b, which would reduce impacts to historical resources by identifying and evaluating significant historical resources and managing avoidance, or preservation, rehabilitation, restoration, or reconstruction in compliance with the Standards as applicable. There are instances, however, when avoidance would not be possible or compliance with the Standards could not be achieved. It could also be possible that substantial or material change in the significance of a historical or archaeological resource could occur even if the Standards are followed. Therefore, even after implementation of Mitigation Measures CUL-1a and CUL-1b, the project would result in a considerable contribution to this cumulative impact.

Buildout of cumulative projects could result in significant cumulative impacts to known and/or unknown archaeological resources. In the event that individual cumulative projects would result in impacts to known or unknown cultural resources, impacts to such resources would be addressed on a case-by-case basis, and would likely be subject to mitigation measures similar to those imposed for development facilitated by the project. As such, cumulative archaeological impacts would be less than significant with appropriate project-specific mitigation. Development facilitated by the project would implement Mitigation Measures CUL-2a and CUL-2b which would ensure impacts to unknown archaeological resources are adequately mitigated. After implementation of Mitigation Measures CUL-2a and CUL-2b, the project would not result in a considerable contribution to cumulative archaeological impacts.

Future projects and cumulative projects in the region would involve ground-disturbing activities which could encounter human remains. If human remains are found, the proposed project and cumulative projects would be required to comply with the State of California Health and Safety Code Section 7050.5. With adherence to existing regulations relating to human remains, cumulative impacts would be less than significant.

4.5 Geology and Soils

This section addresses the potential physical environmental effects related to seismic hazards, underlying soil characteristics, slope stability, erosion, and paleontological resources within the project area that may occur with implementation of the proposed project.

4.5.1 Setting

a. Regional Geology

The project area is located in central Sonoma County in the San Francisco Bay Area. The topography of the region is varied, including several mountain ranges, distinctive valleys, and coastal terraces. The project area is located in the central portion of a wide valley extending from Healdsburg to the San Pablo Bay. The City of Cotati and project area are just south of the Russian River Valley, which encompasses the northern portion of the larger valley. The region is bounded on the south by San Pablo Bay and associated wetlands. Rolling hills and grasslands predominate the landscape in the valleys, which are geographically separated from northern counties such as Lake and Napa Counties by the Mayacamas and Sonoma Mountains. Hillsides in western Sonoma County form the western boundary of the region, including a variety of steep hills, marina terraces, and coastal cliffs (Association of Engineering Geologists 2008).

Tectonic forces and geologically-recent volcanic activity have resulted in the creation of mountains and parallel valleys in the region. The San Andreas Fault system, which generally runs along the western portion of California, is a broad zone of active, dormant, and inactive faults. This fault system results in the northwestern trends of mountains and valleys. Erosion, sedimentation, and seismic activity have further modified the region's landscape into its current form (Association of Engineering Geologists 2008).

The City of Cotati is located within the Coast Ranges geomorphic province, one of the eleven geomorphic provinces of California (California Geological Survey 2002). The Coast Ranges extend along the majority of California's coast from the California-Oregon border to Point Arguello in Santa Barbara County in the south and consist of northwest-trending mountain ranges and valleys. The Coast Ranges are composed of Mesozoic and Cenozoic sedimentary, igneous, and metamorphic strata. The eastern side is characterized by strike-ridges and valleys in the upper Mesozoic strata. The Coast Ranges province runs parallel to and overlaps the San Andreas Fault in some areas.

b. Local Geologic Setting

Cotati is located immediately southwest of Rohnert Park in a valley surrounded by hillsides to the northeast and southwest. Laguna de Santa Rosa traverses the northern portion of Cotati, and is located approximately 0.5 mile west of the project area. Copeland Creek traverses Rohnert Park east to west, and is located approximately 0.7 mile north of the project area. The elevation of the project area ranges from 109 to 120 feet above mean sea level (United States Geological Survey 2024). Surficial soils within the project area consist entirely of Clear Lake Clay, a sandy rock derived from volcanic and sedimentary rock (Natural Resources Conservation Service 2024).

c. Seismic Hazards

Northern California is a region of high seismic activity. Similar to most cities in the region, Cotati is subject to risks associated with potentially destructive earthquakes. The type and magnitude of seismic impacts on the project area are dependent on the distance to the epicenter of the earthquake, the nature of the fault on which the earthquake is located, and the intensity and magnitude of the seismic event.

Faults

The California Geological Survey (CGS) establishes criteria for classification of faults as Holocene-active, Pre-Holocene, and Age-undetermined faults. Holocene-active faults are faults that have had surface displacement during the past 11,700 years. Surface displacement can be recognized by the existence of cliffs in alluvium, terraces, offset stream courses, fault troughs and saddles, the alignment of depressions, sag ponds, and the existence of steep mountain fronts. Pre-Holocene faults are faults that have not moved in the past 11,700 years, thus do not meet the criteria of “Holocene-active fault” as defined in the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) and State Mining and Geology Board (SMGB) regulations (California Code of Regulations, Title 14, Division 2, Section 3601[a]). This class of fault may still be capable of surface rupture, but is not regulated under the A-P Act. Age-undetermined faults are faults where the recency of fault movement has not been determined. Faults can be “age-undetermined” if the fault in question has simply not been studied in order to determine its recency of movement. Within the framework of the A-P Act, age-undetermined faults within regulatory Earthquake Fault Zones can be considered Holocene-active until proven otherwise (CGS 2018).

Regional Faults

Earthquakes from several Holocene-active and pre-Holocene faults in the San Francisco Bay region could affect future development that would be facilitated by the proposed project, although no known regional faults directly traverse the project area. Figure 4.5-1 shows regional faults around the project area. A summary of the Holocene-active faults nearest to the City of Cotati is provided below.

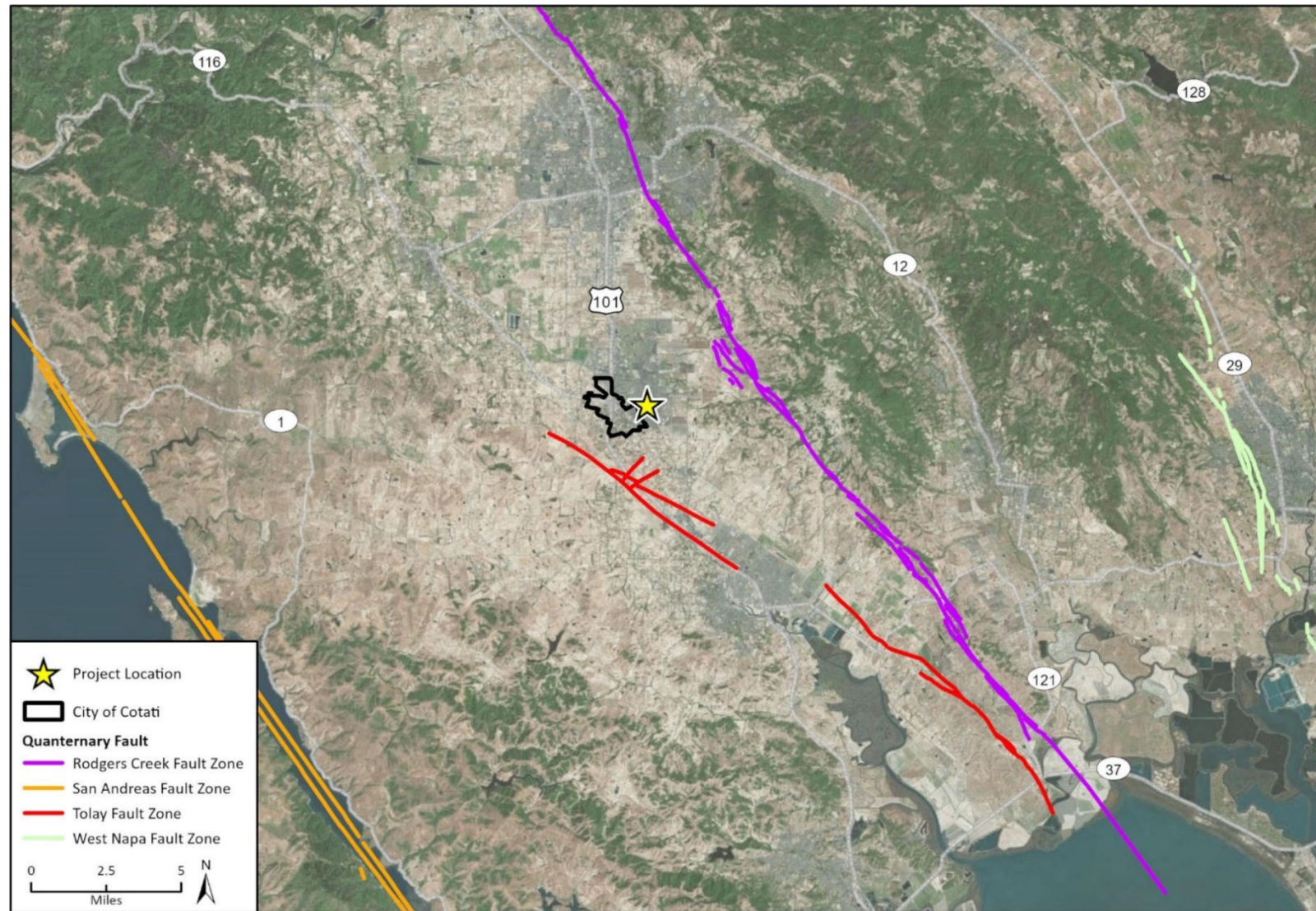
Rodgers Creek Fault Zone

The Rodgers Creek Fault runs through the northern San Francisco Bay Area and links two active faults: the Hayward Fault to the southeast and the Maacama Fault to the northwest. It is located approximately 6 miles east of the project area. The Rodgers Creek Fault is seismically active and two intermediate magnitude (5.6 and 5.7 moment magnitude [Mw]) earthquakes occurred near Santa Rosa in 1969. There is also evidence that the fault slipped about 2 meters (Mw of about 7) in the 18th century (Funning et al. 2007).

San Andreas Fault Zone

This fault zone runs southeast to northwest and is located approximately 17 miles west of the project area at its nearest point. The fault zone extends over 700 miles from the Gulf of California north to the Cape Mendocino area where it continues northward along the ocean floor. The length of the fault and its active seismic history indicates that it has a very high potential for large-scale movement in the near future (7.9 Mw). The most recent large earthquake on the San Andreas Fault to affect the Bay Area was the Loma Prieta earthquake in 1989, which had a Mw of 6.9.

Figure 4.5-1 Fault Lines in the Project Region



Imagery provided by Microsoft Bing and its licensors © 2024.
Additional data provided by California Department of Conservation, 2023.

22-13884 EIPs
Fig X Fault Zones

West Napa Fault Zone

The West Napa Fault runs generally north to south within the Napa Valley, from the northeastern portion of the San Pablo Bay to the western margin of Napa Valley. The slip rate and magnitude of recent seismic events along this fault are largely unknown (Wesling et al. 2008).

Tolay Fault Zone

The Tolay Fault is located approximately 1.5 miles south of the project area, and is considered an extension of the Hayward Fault. There has been no significant strike-slip offset along the fault zone in geologically-recent time (Langenheim et al. 2010).

Recent Seismic Activity

Historically, earthquakes have caused substantial groundshaking in the San Francisco Bay Area region, and include the following major (Mw of 5.0 or greater) quakes in the project region: the 1906 Great San Francisco earthquake (7.8 Mw) along the San Andreas Fault; the 1979 Coyote Lake earthquake (6.0 Mw); 1989 Loma Prieta earthquake (7.1 Mw) along the San Andreas fault; and the 2001 Napa earthquake (5.1 Mw), along the West Napa fault. (Earthquake Safety 2024)

d. Surface Rupture

Surface rupture represents the breakage of ground along the surface trace of a fault, which is caused by the intersection of the fault surface area ruptured in an earthquake with the Earth's surface. Fault displacement occurs when material on one side of a fault moves relative to the material on the other side of the fault. This can have particularly adverse consequences when buildings are located within the rupture zone. It is not feasible, from a structural or economic perspective, to design and build structures that can accommodate rapid displacement involved with surface rupture. Amounts of surface displacement can range from a few inches to tens of feet during a rupture event.

The A-P Act regulates development near active faults to mitigate the hazard of surface fault rupture. There are no Alquist-Priolo Earthquake Fault Zones in the City of Cotati. The Rodgers Creek Fault Zone, the nearest Alquist-Priolo Earthquake Fault Zone, is located approximately 6 miles east of the project area.

e. Groundshaking

The major cause of structural damage from earthquakes is groundshaking. The intensity of ground motion expected at a particular site depends upon the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property. Greater movement can be expected at sites located on poorly consolidated material, such as alluvium, within close proximity to the causative fault, or in response to a seismic event of great magnitude.

f. Secondary Seismic Effects

Potential hazards resulting from the secondary effects of ground-shaking include liquefaction, subsidence, and earthquake-induced landslides. Soil-disturbing activities such as grading, soil compaction, and cut and fill activities can create or exacerbate conditions that increase the chance of such effects during or independent of seismic activity.

Liquefaction

Liquefaction is a phenomenon that occurs in soils where granular sediment or fill material either contain, or lie immediately above, high moisture content. Groundshaking or other rapid loading can reduce the strength and stiffness of a soil and transform it momentarily from a solid state to a liquid state. Buildings in areas that experience liquefaction may suddenly sink or suffer major structural damage. The areas immediately surrounding Laguna de Santa Rosa are identified as having liquefaction potential. Figure 4.5-2 shows geologic and soils hazards identified by the City of Cotati in its General Plan, including liquefaction.

Landslides and Slope Stability

Seismic ground shaking can also result in landslides and other slope instability. Landslides occur when slopes become unstable and masses of earth material move downslope. Landslides are usually rapid events, often triggered during periods of rainfall or by earthquakes. Mudslides and slumps are a shallower type of slope failure. They typically affect the upper soil horizons rather than bedrock features. Usually, mudslides and slumps occur during or soon after periods of rainfall, but they can be triggered by seismic shaking. CGS categorizes landslide susceptibility into several classes depending on rock strength and slope. Areas with high rock strength and low slopes have a landslide susceptibility class of 0, and areas with weak rock strength and high slopes have a landslide susceptibility class of 10 (CGS 2011). As shown in Figure 4.5-2 and Figure 4.5-3, Cotati and the project area are located in an area of relatively low landslide risk with susceptibility classes of 0 to 5 (CGS 2019).

g. Other Geologic Hazards

Some of the geotechnical hazards discussed above, such as landslides and liquefaction, can be triggered by or occur independently of seismic events. Others, such as subsidence, expansive soils, and soil erosion occur independently of seismic events, and are discussed here.

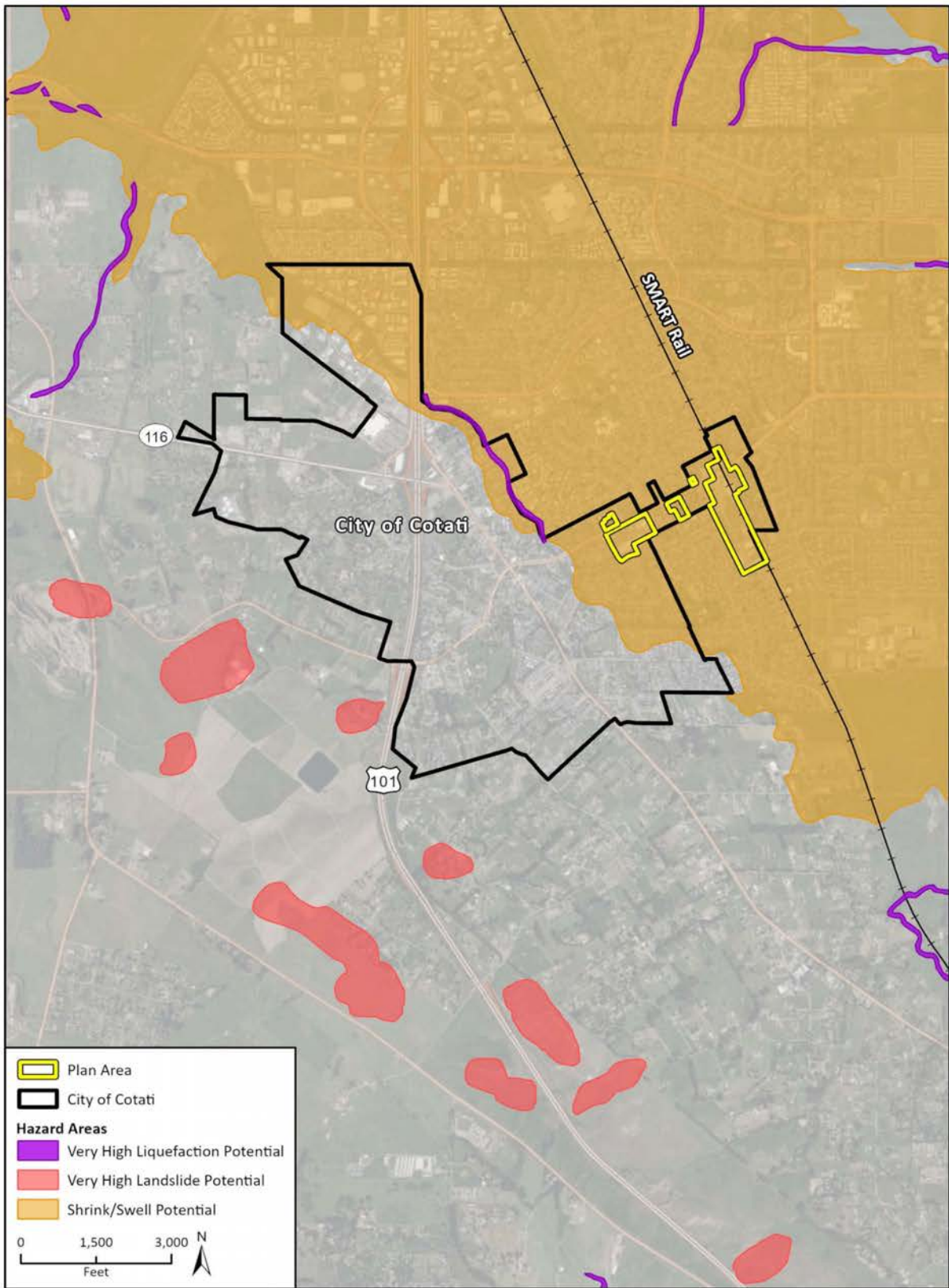
Subsidence

Subsidence refers to the sinking of a large area of ground surface in which material is displaced vertically with little or no horizontal movement. Subsidence originates at great depths below the surface when subsurface pressure is reduced by the natural loss or human withdrawal of fluids (e.g., groundwater, natural gas, or oil), or can occur due to soil compression. Subsidence is not identified as an issue of concern in Cotati (City of Cotati 2013).

Expansive Soils

Expansive soils swell with increases in moisture content and shrink with decreases in moisture content. These soils usually contain high clay content. Foundations for structures constructed on expansive soils require special design considerations. Because expansive soils can expand when wet and shrink when dry, they can cause foundations, basement walls and floors to crack, causing substantial structural damage. As such, structural failure due to expansive soils near the ground surface is a potential hazard. As shown in Figure 4.5-2, the project area is located in an area with potentially expansive soils (City of Cotati 2013).

Figure 4.5-2 Geologic and Soils Hazards in Cotati

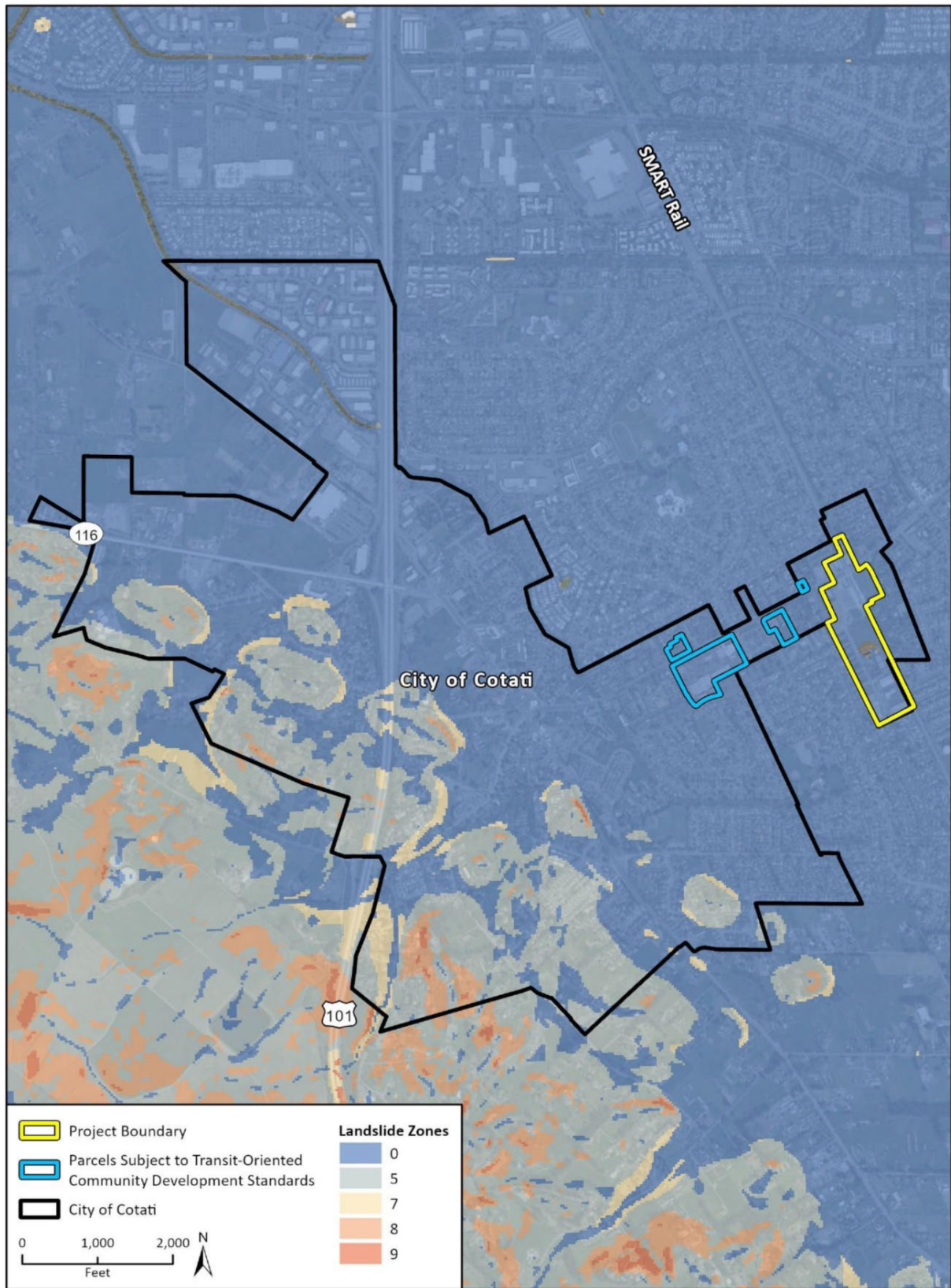


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Additional data provided by ABAG, USGS, NRCS SSURGO, 2024.

Source: City of Cotati 2015

22-13884 EPS
Fig 4.5-2 Geologic Hazards

Figure 4.5-3 Landslide Vulnerability of Project Area



Soil Erosion

Erosion refers to the removal of soil by water or wind. Factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. Depending on how well protected the soil is from these forces; the erosion process can be very slow or rapid. Removal of natural or manufacture protection can result in substantial soil erosion and excessive sedimentation and pollution problems in streams, lakes, and estuaries. Construction activities represent the greatest potential cause of erosion in the City. Cotati and the project area are primarily underlain by clay and sandy loam soils, which have low to moderate potential for erosion (City of Cotati 2013).

h. Paleontological Resources

Paleontological resources, or fossils, are the remains and traces of prehistoric life. Fossils are typically preserved in layered sedimentary rocks and the distribution of fossils is a result of the sedimentary history of the geologic units within which they occur. Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. Although it is not possible to determine whether a fossil will occur in any specific location, it is possible to evaluate the potential for geologic units to contain scientifically significant paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they do occur during construction.

The City of Cotati is located within the *Cotati, California* Geological Survey 7.5-minute topographic quadrangle. The regional geology was mapped by Clahan et al. (2003), who identified three distinct geologic units underlying the project area as shown in Figure 4.5-4. The units within the project area are artificial fill, Holocene alluvial fan deposits, and Holocene alluvial fan deposits (fine facies).

Artificial Fill

Artificial fill consists of sediment that has been deposited by humans to change the natural grade of the land (Clahan et al. 2003). Artificial fill is found running northwest/southeast through the center of the City of Cotati including within the project area (Figure 4.5-4). Artificial fill is deposited by human activities and therefore cannot preserve paleontological resources. Accordingly, these units are assigned no paleontological sensitivity.

Holocene Alluvial Fan Deposits

Holocene alluvial fan deposits consist of moderately to poorly sorted sand, gravel, silt, and clay (Clahan et al. 2003). Holocene alluvial fan deposits represent streams emanating from mountain drainages onto alluvial valleys and underlie the eastern portions of project area (Figure 4.5-4). Holocene alluvial fan deposits (fine facies) consist of predominantly clay with interbedded lenses of coarser alluvium (Clahan et al. 2003). Holocene alluvial fan deposits (fine facies) represent fine-grained alluvial fan and floodplain overbank deposits on very gently sloping portions of the valley floor. Holocene alluvial fan deposits (fine facies) underlie the western portions of the project area (Figure 4.5-4). Holocene units are generally considered too young (i.e., less than 5,000 years old) to preserve scientifically significant paleontological resources (SVP 2010). Therefore, Holocene alluvial fan deposits have a low paleontological sensitivity.

Figure 4.5-4 Geologic Map of Project Area



Subsurface Geology

Holocene-aged geologic units, such as artificial fill, Holocene alluvial fan deposits, and Holocene alluvial fan deposits (fine facies), are generally underlain by sediments that are old enough to preserve paleontological resources (i.e., greater than 5,000 years old; SVP 2010). Early Holocene and Pleistocene alluvial sediments are known to preserve paleontological resources in Sonoma County, including mastodon (*Mammuth*), ground sloth (*Paramylodon*), horse (*Equus*), other mammals, and invertebrates (Jefferson 2010; Paleobiology Database 2024; University of California Museum of Paleontology 2024). Therefore, early Holocene- and Pleistocene-aged alluvial sediments found beneath the surface within the project area are considered to have high paleontological sensitivity. The precise depth of this transition is unknown and likely varies throughout the project area. However, given the urban development of the majority of the project area and the lack of nearby surficial exposures of older (i.e., high-sensitivity) geologic units, this transition depth is likely at least 5 feet below the surface.

In summary, the three geologic units within the project area – artificial fill, Holocene alluvial fan deposits, and Holocene alluvial fan deposits (fine facies) – are assigned no (artificial fill) or low (Holocene alluvial fan deposits, and Holocene alluvial fan deposits [fine facies]) paleontological sensitivity from the surface to 5 feet below the surface, and undetermined paleontological sensitivity greater than 5 feet below the surface because they cover older, high-sensitivity sediments, but at unknown depths.

4.5.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCB). Cotati is within a watershed administered by the Russian River Watershed Association (Russian River Watershed Association 2024). While the CWA is primarily associated with protecting and enhancing surface water quality, some regulatory provisions of the CWA help to control erosion and soil loss and compliance with these provisions can help mitigate potential impacts to geology and soils.

Disaster Mitigation Act of 2000

Congress passed the Disaster Mitigation Act of 2000 to amend the Robert T. Stafford Disaster Relief and Emergency Assistance Act by invoking new and revitalized approaches to mitigation planning. Section 322 of the Act emphasized the need for state and local government entities to closely coordinate on mitigation planning activities and makes the development of a hazard mitigation plan a specific eligibility requirement for any local government applying for federal mitigation grant funds. Communities with an adopted and federally-approved hazard mitigation plan thereby

become pre-positioned and more apt to receive available mitigation funds before and after the next declared disaster.

To implement the new Stafford Act provisions, FEMA published requirements and procedures for local hazard mitigation plans in the Code of Federal Regulations (CFR) at Title 44, Chapter 1, Part 201.6. These regulations specify minimum standards for developing, updating, and submitting local hazard mitigation plans for FEMA review and approval at least once every five years.

b. State Regulations

California Building Code

The California Building Code (CBC), Title 24, Part 2 provides building codes and standards for the design and construction of structures in California. The 2022 CBC is based on the 2021 International Building Code with the addition of more extensive structural seismic provisions. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures. The CBC requires addressing soil-related hazards, such as treating hazardous soil conditions involving removal, proper fill selection, and compaction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo (A-P) Act of 1972 was passed into law following the destructive February 9, 1971, 6.6 Mw San Fernando earthquake. Essentially, this Act contains two requirements: (1) it prohibits the location of most structures for human occupancy across the trace of active faults; and (2) it establishes Earthquake Fault Zones and requires geologic/seismic studies of all proposed developments within 1,000 feet of the zone. The Earthquake Fault Zones are delineated and defined by the State Geologist and identify areas where potential surface rupture along a fault could occur. The A-P Act provides a mechanism for reducing losses from surface fault rupture on a statewide basis. The intent of the A-P Act is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. This A-P Act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) of 1990 was passed into law following the destructive October 17, 1989, 6.9 Mw Loma Prieta earthquake. The SHMA directs the CGS to delineate Seismic Hazard Zones. The purpose of the SHMA is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The SHMA requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones.

California Public Resources Code

Section 5097.5 of the Public Resources Code states:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

Here “public lands” means those owned by, or under the jurisdiction of, the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with Public Resources Code Section 5097.5 for their own activities, including construction and maintenance, and for permit actions (e.g., encroachment permits) undertaken by others.

c. Local Regulations

Sonoma County Multijurisdictional Hazard Mitigation Plan

The County of Sonoma’s Multijurisdictional Hazard Mitigation Plan (MHMP), updated in 2021, establishes and promotes a comprehensive mitigation policy and program to protect the health, safety, and welfare of residents within Sonoma County. The City of Cotati has an annex in the MHMP for hazards most applicable to the city, which were identified to include earthquakes, fire, and severe weather (County of Sonoma 2021). The MHMP addresses geologic hazards, including shaking and liquefaction, and implements mitigation regarding earthquake hazards. The MHMP:

- Meets the requirements of federal assistance grant programs, including FEMA’s Hazard Mitigation Grant Program and Pre-Disaster Mitigation (PMD) funding.
- Works in conjunction with other plans, including the City’s General Plan.
- Establishes a basis for coordination and collaboration among community entities such as private and public agencies, key stakeholders, and residents to provide for the fullest amount of transparency.
- Identifies and prioritizes future mitigation projects.

Cotati Municipal Code

The City of Cotati adopted the CBC with local amendments through Cotati Municipal Code Section 14.04.040. In addition to the Building Code, the Cotati Municipal Code includes several other provisions intended to address local geologic and soil conditions which are listed below.

- Section 13.68.125 of the City’s Stormwater Ordinance (Chapter 13.68) includes grading and erosion control requirements for construction projects.
- Chapter 14.34 establishes minimum requirements for grading on public or private property to reduce or eliminate hazards related to earthslides, mud flows, rock falls, undue settlement, erosion, siltation, and flooding.
- Chapter 14.36 includes regulations applicable to construction activities on public and private property in order to control erosion and sedimentation and to protect water quality.

City of Cotati General Plan

The Safety Element of the Cotati General Plan (City of Cotati 2015) includes a section regarding protection from geologic hazards, which include seismic hazards such as fault movement, ground shaking, ground failure, ground displacement along fault traces, tsunamis, secondary effects of earthquakes, landslide, and expansive soils, including:

Goal SA 2: Reduce risks to human life and property from seismic and geologic hazards

Objective SA 2A: Regulate development in areas of seismic and geologic hazards to reduce risks associated with earthquakes, liquefaction, erosion, landslides, and expansive soils

Policy SA 2.1: Require new land development proposals to avoid unreasonable exposure to geologic hazards, including earthquake damage, subsidence, liquefaction, and expansive soils.

Policy SA 2.2: Ensure that all development and construction proposals are reviewed by the City to ensure conformance with applicable building standards.

Policy SA 2.3: Require geotechnical investigations to be completed prior to approval of any schools, hospitals, fire stations, and police stations, as means to ensure that these critical facilities are constructed in a way that mitigations site-specific seismic and/or geological hazards.

Policy SA 2.4: Development in areas subject to liquefaction, such as along East and West Cotati Avenues and Gravenstein Highway, shall be reviewed by qualified soils engineers and geologists prior to development in order to ensure the safety and stability of all construction.

Policy SA 2.10: An erosion and sediment control plan prepared by a civil engineer or other professional who is qualified to prepare such a plan, shall be submitted as part of a grading permit application. The erosion and sediment control plan shall delineate measures to appropriately and effectively minimize soil erosion and sedimentation, and shall comply with the design standards and construction site control measures contained in Chapter 14.36 of the Municipal Code.

Policy SA 2.11: Prior to the development of any new structures and any addition greater than 500 square feet in areas of moderate to high potential for expansive soils as identified in Figure 7.1-5 of the General Plan Background Report, a site-specific soils study shall be prepared. All structures and building foundations located within areas containing expansive soils shall be designed and engineered to comply with the most current version of the California Building Standards Code.

The Conservation Element of the Cotati General Plan contains the following goals and policies pertaining to paleontological resources:

Goal CON 4: Protect and Preserve Cotati's Historic and Cultural Resources

Action CON 4c: Require all development, infrastructure, and other ground-disturbing projects to comply with the following conditions in the event of an inadvertent discovery of cultural resources or human remains:

- a. If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Department shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Department.

4.5.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, a project would have a significant impact on geology and soils if it would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - a. 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;
 - b. Strong seismic ground shaking;
 - c. Seismic-related ground failure, including liquefaction; or
 - d. Landslides;
2. Result in substantial soil erosion or the loss of topsoil;
3. 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;
4. 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;
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Methodology

This section describes the potential environmental impacts of the proposed project relevant to geology and soils. The impact analysis is based on an assessment of baseline conditions for the project area, including topography, geologic and soil conditions, and seismic hazards, as described above under Section 4.5.1, *Setting*. This analysis identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to development under the proposed project. This section describes impacts in terms of location, context, duration, and intensity, and recommends mitigation measures, when necessary, to avoid or minimize impacts.

Paleontological Resources Sensitivity

Absent specific agency guidelines, most professional paleontologists in California adhere to guidelines set forth by the SVP in *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources* (SVP 2010). These guidelines establish detailed protocols for the assessment of the paleontological resource potential, or “sensitivity” of a project area and outline measures to follow in order to mitigate adverse impacts to known or unknown fossil resources during project development. Using baseline information gathered during a paleontological resource assessment, the paleontological resource potential of the geologic unit(s) or members thereof underlying a project area can be assigned to a high, undetermined, low, or no paleontological sensitivity category, as defined by SVP (SVP 2010). This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. While these standards were specifically written to protect vertebrate paleontological resources, all fields of paleontology have adopted these guidelines.

Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, rare, diagnostically important, or are common but have the potential to provide valuable scientific information for evaluating evolutionary patterns and geologic processes. New or unique specimens can provide new insights into evolutionary history; however, additional specimens of even well represented lineages can be equally important for studying evolutionary pattern and process, and evolutionary rates. As such, common fossils, especially vertebrates, may be scientifically important, and therefore considered highly significant.

In general, for geologic units with high sensitivity, full-time monitoring is recommended during any project-related ground disturbance. For geologic units with low or no sensitivity, protection or salvage efforts are not required. For geologic units with undetermined sensitivity, field surveys by a qualified paleontologist are usually recommended to specifically determine the paleontological potential of the rock units present within the project area.

Rincon assessed the paleontological sensitivity of each of the three geologic units underlying the project area according to SVP guidelines (SVP 2010). The sensitivity assignments were made based on review of primary scientific literature, geologic maps, and online fossil databases.

b. Project Impacts and Mitigation Measures

Threshold 1a: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

Impact GEO-1 THERE ARE NO KNOWN FAULTS WITHIN THE PROJECT AREA. THE PROJECT WOULD NOT DIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS INVOLVING RUPTURE OF A KNOWN EARTHQUAKE FAULT AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.5.1, *Setting*, and in the MHMP, no known faults are located in the project area. The nearest fault to the project area is the Tolay Fault, located approximately 1.5 miles south of the project area. The nearest Alquist-Priolo Earthquake Fault Zone, the Rodgers Creek Fault Zone, is located approximately 6 miles east of the project area. Therefore, the likelihood of ground rupture from a fault zone within the project area is minimal. Impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1b: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Impact GEO-2 THE PROJECT WOULD FACILITATE DEVELOPMENT IN A SEISMICALLY ACTIVE AREA THAT COULD BE SUBJECT TO SEISMIC GROUND SHAKING. COMPLIANCE WITH APPLICABLE REGULATIONS, INCLUDING THE CALIFORNIA BUILDING CODE AND COTATI MUNICIPAL CODE, WOULD REDUCE THE POTENTIAL FOR SUBSTANTIAL ADVERSE EFFECTS RELATED TO SEISMIC GROUND SHAKING TO OCCUR AND WOULD REDUCE THIS IMPACT TO A LESS THAN SIGNIFICANT LEVEL.

The project would facilitate development in an area known to experience seismic activity, including ground shaking. New development facilitated by the project would be subject to Cotati Municipal Code and CBC engineering design and construction requirements. Development designed in accordance with the CBC would be able to: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage, but with some non-structural damage; and 3) resist major earthquakes without collapse, but with some structural, as well as non-structural, damage. Compliance with the CBC would minimize potential structural damage and the exposure of people to the risk of injury or death from seismic ground shaking or structural failure. Foundations and other structures for features would be designed to resist and absorb damaging forces from strong ground shaking and liquefaction in accordance with CBC requirements. Specifically, Section 1613 of the CBC requires every structure and portion thereof, including non-structural components that are permanently attached to structures and their supports and attachments, to be designed and constructed to resist the effects of earthquake motions. Additionally, the project would primarily include development on infill sites, which would either replace older buildings that may be more susceptible to seismic damage with newer structures built to current seismic standards, which could better withstand the adverse effects of strong ground shaking. Allowable increases in height as a result of the project could require foundations and other structural support features to be more robust to support the additional height; however, compliance with CBC regulations would ensure that the buildings would meet seismic safety standards.

Additionally, adherence to applicable Cotati General Plan policies would reduce impacts related to seismic and geologic hazards. Specifically, Policy SA 2.1 requires new development to avoid unreasonable exposure to hazards, Policy SA2.2 requires City review of development proposals for conformance with building standards, and Policy SA 2.3 requires the preparation of site-specific geotechnical investigations for critical facilities. Implementation of General Plan policies and compliance with the CBC and relevant Cotati Municipal Code sections would reduce the potential for loss, injury, or death following seismic ground shaking to less than significant levels.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1c: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Impact GEO-3 THE PROJECT WOULD FACILITATE DEVELOPMENT IN A SEISMICALLY ACTIVE AREA THAT COULD BE SUBJECT TO SEISMIC-RELATED GROUND FAILURE, SUCH AS LIQUEFACTION. COMPLIANCE WITH APPLICABLE REGULATIONS, INCLUDING THE CALIFORNIA BUILDING CODE AND COTATI MUNICIPAL CODE, WOULD REDUCE THE POTENTIAL FOR SUBSTANTIAL ADVERSE EFFECTS RELATED TO LIQUEFACTION TO OCCUR, AND WOULD REDUCE THIS IMPACT TO A LESS THAN SIGNIFICANT LEVEL.

As discussed in Section 4.5.1, *Setting*, and shown in Figure 4.5-2, the areas immediately surrounding Laguna de Santa Rosa in Cotati are identified to have very high liquefaction potential. The project area does not overlap with these hazard areas. Additionally, development within the project area would be required to be built to current seismic standards that could better withstand the adverse effects of liquefaction. Potential structural damage and the exposure of people to the risk of injury or death from structural failure associated with liquefaction would be minimized by compliance with CBC engineering design and construction measures. Foundations and other structural support features would be required to be designed to resist or absorb damaging forces from liquefaction. Allowable increases in height as a result of the project could require foundations and other structural support features to be more robust to support the additional height; however, compliance with CBC regulations would ensure that the buildings would meet seismic safety standards.

Adherence to applicable Cotati General Plan policies and Cotati Municipal Code would further reduce impacts related to liquefaction. Specifically, Policy SA 2.1 requires new development to avoid unreasonable exposure to hazards, Policy SA2.2 requires City review of development proposals for conformance with building standards, and Policy SA 2.3 requires the preparation of site-specific geotechnical investigations for critical facilities. Section 14.34.050 of Cotati Municipal Code also requires preparation of a site-specific geotechnical report prior to issuance of grading permits. Site-specific geotechnical investigations would identify liquefaction potential within individual development sites and include recommendations to reduce hazards associated with liquefaction. Accordingly, implementation of General Plan policies and compliance with relevant Cotati Municipal Code sections would reduce the potential for loss, injury, or death associated with liquefaction to less than significant levels.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1d: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Impact GEO-4 THE PROJECT AREA IS NOT LOCATED IN AN AREA WITH LANDSLIDE POTENTIAL. THE PROJECT WOULD NOT DIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS RELATED TO LANDSLIDES AND NO IMPACT WOULD OCCUR.

As discussed in Section 4.5.1, *Setting*, and shown in Figure 4.5-2 and Figure 4.5-3, the project area is not located within a landslide hazard zone. The project area is relatively flat, and development facilitated by the project would not cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

Threshold 2: Would the project result in substantial soil erosion or the loss of topsoil?

Impact GEO-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCLUDE GROUND DISTURBANCE SUCH AS EXCAVATION AND GRADING THAT WOULD RESULT IN LOOSE OR EXPOSED SOIL, INCREASING THE POTENTIAL FOR EROSION AND SOIL LOSS. COMPLIANCE WITH APPLICABLE REGULATIONS, INCLUDING THE CLEAN WATER ACT, COTATI MUNICIPAL CODE, AND COTATI GENERAL PLAN, WOULD REDUCE THE POTENTIAL FOR EROSION AND LOSS OF TOPSOIL AND WOULD REDUCE THIS IMPACT TO A LESS THAN SIGNIFICANT LEVEL.

As discussed in Section 4.5.1, *Setting*, the city and project area have a slight potential for erosion risks. Development facilitated by the proposed project could involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water.

Construction activities that disturb one or more acres of land surface are subject to the National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (Order No. 2022-0057-DWQ) issued by the State Water Resources Control Board (SWRCB). Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require development of a Stormwater Pollution Prevention Plan (SWPPP), which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after storms is also required to identify storm water discharge from the construction activity and to identify and implement erosion controls, where necessary.

Cotati Municipal Code Chapter 14.36 details the City's erosion and sediment control ordinance which regulates grading on public and private property to control erosion and sedimentation. Cotati Municipal Code Section 14.36.040 requires proper soil stabilization for all graded areas and requires construction contractors to implement BMPs to prevent discharge of construction wastes, debris, or contaminants into the stormwater system. Compliance with the requirements of the City's Municipal Code would reduce the potential for construction and soil disturbance under the

proposed project to cause erosion or the loss of topsoil by ensuring proper management of loose and disturbed soil.

Additionally, adherence to applicable Cotati General Plan policies listed above (Polic SA 2.2 and SA 2.10) would reduce impacts related to erosion. Implementation of applicable policies and compliance with state and local regulations would ensure that development under the proposed project would reduce impacts related to erosion and loss of topsoil to less than significant levels.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Impact GEO-6 CONSTRUCTION AND OCCUPANCY OF DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD BE LOCATED ON GEOLOGIC UNITS THAT ARE UNSTABLE, RESULTING IN LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE. HOWEVER, REQUIRED ADHERENCE TO THE CBC AND COTATI MUNICIPAL CODE WOULD REDUCE POTENTIAL IMPACTS TO A LESS THAN SIGNIFICANT LEVEL.

The project area is located in a seismically active region and development facilitated by the project could be located on unstable geologic units or soils. The potential for the project to result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse is discussed in the following subsections.

Landslide

As discussed under Impact GEO-4, the project area is not located within a landslide hazard zone. The project area is relatively flat, and ground disturbing activities associated with development facilitated by the project would not have the potential to result in on- or off-site landslides. No impact would occur.

Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure that occurs on gentle slopes or flat areas, when poorly-drained soils lose pressure during ground shaking and fall apart. The project area is underlain by Clear Lake Clay soil types, which are dense, poorly drained soils, and could be subject to lateral spreading. However, development facilitated by the project would be required to be designed in accordance with CBC requirements. Structures would be designed to withstand ground failure and lateral spreading with some damage, and foundations and other structures for features would be designed to resist and absorb damaging forces from lateral spreading in accordance with CBC requirements. Additionally, allowable increases in height as a result of the project could require foundations and other structural support features to be more robust to support the additional height; however, compliance with CBC regulations would ensure that the buildings would meet seismic safety standards. Compliance with the CBC would reduce the potential for on- or off-site lateral spreading and impacts would be less than significant.

Subsidence and Collapse

Subsidence and collapse are the downward vertical movement or shrinking of the ground surface, which can be caused by natural activity (e.g., ground shaking or sinkholes) or human activity (e.g., drilling or groundwater dewatering). Development facilitated by the project would require ground disturbance and could require groundwater dewatering. However, the project would not involve substantial, long-term dewatering such that subsidence would result. Accordingly, the project would not have the potential result in subsidence and impacts would be less than significant.

Liquefaction

As discussed under Impact GEO-3, the areas immediately surrounding Laguna de Santa Rosa in Cotati are identified to have very high liquefaction potential. The project area does not overlap with these hazard areas. Additionally, development within the project area would be required to be built to current seismic standards that could better withstand the adverse effects of liquefaction. Accordingly, the project would not have the potential result in liquefaction and impacts would be less than significant.

Therefore, the project would not potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, and impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4: Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact GEO-7 DEVELOPMENT FACILITATED BY THE PROJECT HAS THE POTENTIAL TO BE LOCATED ON EXPANSIVE SOILS. WITH REQUIRED ADHERENCE TO THE CBC AND COTATI MUNICIPAL CODE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.5.1, *Setting* and shown in Figure 4.5-2, the project area is located in an area with moderate to high expansive soils. Construction of development facilitated by the project would comply with local amendments to the CBC and applicable federal, state, and local regulations that would ensure construction activities (e.g., excavation of subterranean space) would not cause direct or indirect impacts to life or property in areas where expansive soils could potentially exist. No respective construction impacts would occur.

Development facilitated by the project could occur on expansive soils, as defined by Table 1-B of the Uniform Building Code (1994), and thus could be subject to damage or instability when the underlying soil shrinks or swells. The adverse effects of expansive soils can be avoided through proper subsoil preparation, drainage, and foundation design. Pursuant to the CBC and Cotati Municipal Code, development facilitated by the project would be subject to minimum standards for engineered subgrade and slab reinforcement to allow concrete slabs to better resist expansive soil conditions, and rain gutters, downspouts, rain leaders, splash blocks, and concrete landings would be required to keep rainwater away from foundations and slabs and minimize the potential for the

underlying expansive soils to damage structures. Future development would also be subject to Chapter 14.34 of the Cotati Municipal Code, which includes the City's regulations for excavation, grading, and fill. Section 14.34.050 of Cotati Municipal Code also requires preparation of a site-specific geotechnical report prior to issuance of grading permits. Site-specific geotechnical investigations would identify liquefaction potential within individual development sites and include recommendations to reduce hazards associated with expansive soils.

Compliance with the requirements of the CBC, as well as relevant city policies and ordinances, would reduce risks related to expansive soils. Therefore, project operational impacts related to expansive soils would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 5: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact GEO-8 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD NOT REQUIRE THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS. NO IMPACT WOULD OCCUR.

Development facilitated by the proposed project would occur within developed areas served by existing sanitary sewer systems. New development would be required to connect to existing sewer systems. Development facilitated by the project would not require the use of septic tanks or alternative wastewater disposal systems and no impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

Threshold 6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-9 DEVELOPMENT FACILITATED BY THE PROJECT HAS THE POTENTIAL TO IMPACT PALEONTOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Consistent with SVP guidelines, the paleontological sensitivity of the three geologic units underlying the project area was evaluated based on review of published geologic maps, a literature review, and online fossil locality databases (SVP 2010). None of the three geologic units have high paleontological sensitivity at the surface (Figure 4.5-4), but all of them, due to their Holocene age, likely transition to high-sensitivity sediments below the surface. The precise depth of this transition

is unknown, so all three geologic units are considered to have undetermined paleontological sensitivity greater than 5 feet below the surface.

Ground-disturbing activities associated with construction facilitated by the project including grading and excavation, particularly in areas with little or no prior urban development, have the potential to damage or destroy paleontological resources that may be present at depths greater than 5 feet below the ground surface. Consequently, damage to or destruction of fossils could occur due to development under the project. Impacts would be potentially significant and require mitigation.

Mitigation Measures

GEO-9a Unanticipated Discovery of Paleontological Resources

The City shall require the following mitigation measure for all projects involving ground disturbance of sediments that may have high paleontological sensitivity (i.e., sediments greater than 5 feet below the surface) in order to mitigate potential impacts to unanticipated paleontological resources discovered during project construction:

- The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Qualified Professional Paleontologist as defined by the Society of Vertebrate Paleontology (SVP; 2010). If the find is determined to be scientifically significant, the Qualified Professional Paleontologist shall direct all mitigation measures related to paleontological resources consistent with the SVP (2010) standards, which shall include fossil salvage, laboratory preparation, curation in a paleontological repository, and a paleontological monitoring report. Additionally, the Qualified Professional Paleontologist and City shall decide if full- or part-time monitoring shall be instated for further project-related excavations. A Qualified Professional Paleontologist, is defined by the SVP (2010) as an individual with:
 - A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.
 - At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.
 - Proficiency in recognizing fossils in the field and determining their significance.
 - Expertise in local geology, stratigraphy, and biostratigraphy.
 - Experience collecting vertebrate fossils in the field.

GEO-9b Paleontological Resources Mitigation During Construction

For projects that could disturb previously undisturbed sediments greater than 5 feet below the surface, the project applicant shall:

- **Retain a Qualified Professional Paleontologist.** The Qualified Professional Paleontologist shall determine the applicable following mitigation measures depending on the volume of the proposed ground disturbance, nature of the proposed ground disturbance, development history of the project site, and/or other criteria. The Qualified Professional Paleontologist shall oversee the implementation of these mitigation measures which may include some, all, or none of the following:

- **Paleontological Worker Environmental Awareness Program.** Prior to the start of construction, a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP; 2010), or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel. The WEAP shall discuss the potential to discover paleontological resources in the project site, legal obligations to protect paleontological resources, examples of paleontological resources that may be found in the project site, procedures in case a paleontological resource is discovered, and contact information for the Qualified Professional Paleontologist.
- **Paleontological Monitoring.** Paleontological monitoring shall be conducted by a paleontological monitor with experience with collection and salvage of paleontological resources and who meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor, meaning an individual with:
 - BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or
 - AS or AA in geology, paleontology, or biology and demonstrated two years experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or
 - Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project.

Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.

The Qualified Professional Paleontologist has the authority to determine the duration, frequency, and specific locations, of paleontological monitoring, which may change during project construction based on geological observations made during monitoring.

- **Paleontological Resource Discovery Protocols.** In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease until the discovery can be evaluated by the Qualified Professional Paleontologist. If a fossil is not scientifically significant, then construction activity may resume. If it is determined that a fossil is potentially scientifically significant, the following shall be completed:
 - The paleontological monitor shall salvage (excavate and recover) the fossil to protect it from damage/destruction. Typically, fossils can be safely salvaged quickly by a single paleontological monitor with minimal disruption to construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrate fossils. After a fossil is salvaged, construction activity may resume.

- Fossils shall be identified to the lowest (most-specific) possible taxonomic level, prepared to a curation-ready condition, and accessioned to a paleontological repository, defined by the SVP (2010) as a “not-for-profit museum or university approved by the lead agency and employing a permanent curator responsible for paleontological records and specimens,” alongside all metadata (e.g., maps, coordinates, stratigraphic/geologic data, etc.) required by the paleontological repository.
- **Paleontological Monitoring Report.** This measure shall be required if paleontological monitoring occurred or significant paleontological resources were discovered. Upon completion of ground-disturbing activities (or laboratory preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a report describing the results of the paleontological monitoring efforts. The report shall include a summary of field and laboratory methods employed; an overview of project geology; and, if fossils were discovered, an analysis of the fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the City and, if fossil curation occurred, the paleontological repository.

Significance After Mitigation

Mitigation Measures GEO-9a and GEO-9b would provide protections for unanticipated paleontological resources during construction, and would ensure the proper treatment of paleontological resources upon discovery during construction activities. The presence of a paleontological monitor, as required by Mitigation Measure GEO-9b, would ensure the proper identification of resources in higher-sensitivity areas (i.e., when construction proposes ground disturbance at depths greater than 5 feet into previously undisturbed sediments). Therefore, these mitigation measures would reduce potential impacts to paleontological resources to a less than significant level.

4.5.4 Cumulative Impacts

The geographic scope of the cumulative geology and soils analysis is the project area and the surrounding vicinity. Adverse effects associated with geology and soils impacts tend to be localized; therefore, an area generally within a 0.25-mile radius of individual sites would be the area most affected by activities in combination with the proposed project. In addition, adverse effects associated with paleontological resource impacts tend to be localized, because the integrity of the given resource depends on what occurs only in the immediate vicinity around that resource, such as disruption of soils. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Section 3, *Environmental Impact Analysis*) located in Cotati and surrounding areas in addition to the proposed project.

Cumulative projects, including development facilitated by the proposed project, have the potential to experience strong to violent ground shaking from earthquakes. Cumulative projects listed in Table 3-1 would be exposed to the same ground shaking hazards and likewise would be subject to the same requirements. All cumulative projects would adhere to the provisions of the California Building Code, and policies of their respective general plans and municipal codes, reducing potential hazards associated with seismic ground shaking and ground failure. Therefore, the cumulative impact related to seismic-related hazards would be less than significant.

Soil conditions associated with the proposed project, such as liquefaction and expansive soils, are specific to individual sites and generally do not contribute to a cumulative effect. Some or all other

cumulative projects may have similar conditions, but they similarly would not substantially contribute to cumulative effects. Future development in the city would be subject to applicable General Plan policies, municipal code requirements, and CBC requirements related to reducing seismic and soil-related hazards such as ground shaking, liquefaction, landslides, erosion, lateral spreading, or collapse. Other current and future development/redevelopment projects in the region would similarly be required to adhere to standards and practices that include stringent geologic and soil-related hazard mitigations. Therefore, the cumulative impacts would be less than significant.

Construction activities associated with development of cumulative plans and projects in or within the vicinity of the project area may have the potential to encounter undiscovered paleontological resources. Cumulative development would be required to mitigate for impacts through compliance with applicable federal and State laws governing paleontological resources. The likelihood that paleontological resources are present on the cumulative area is relatively low, given that the majority of soil disturbance associated with the area will take place within Holocene soils too young to contain fossils. Although there is the possibility that previously undiscovered resources could be encountered by subsurface earthwork activities, the implementation of standard construction mitigation measures similar to those described Mitigation Measures GEO-9a and GEO-9b would ensure that undiscovered resources are not adversely affected by cumulative project-related construction activities, which would prevent the destruction or degradation of potentially significant paleontological resources in the vicinity of the project area. Given the low potential for disruption and the comprehensiveness of mitigation measures that would apply to the cumulative projects in the vicinity, the proposed project, in conjunction with cumulative plans and projects, would result in a less than significant cumulative impact with mitigation related to paleontological resources, and the project would not have a considerable contribution to cumulative impacts.

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4.6 Greenhouse Gas Emissions

This section analyzes the potential for the project to generate greenhouse gas (GHG) emissions in excess of standards or to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

4.6.1 Setting

a. Climate Change and Greenhouse Gases

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as “carbon dioxide equivalent” (CO₂e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 25, meaning its global warming effect is 25 times greater than CO₂ on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2023).¹

GHGs are emitted by natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Emissions of CO₂ are usually by-products of fossil fuel combustion, and CH₄ results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO₂, include fluorinated gases and SF₆.

Climate change is the observed increase in the average temperature of the Earth’s atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term “climate change” is often used interchangeably with the term “global warming,” but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The IPCC expressed that the rise and continued growth of atmospheric CO₂ concentrations is unequivocally due to human activities in the IPCC’s Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and

¹ The IPCC’s (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the IPCC’s (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatons of anthropogenic CO₂ was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2023). Furthermore, since the late 1700s, estimated concentrations of CO₂, methane, and nitrous oxide in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity. Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature.

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 33 degrees Celsius (°C) cooler (World Meteorological Organization 2023). However, since 1750, estimated concentrations of CO₂, CH₄, and N₂O in the atmosphere have increased by 47 percent, 156 percent, and 23 percent, respectively, primarily due to human activity (IPCC 2023). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

b. Greenhouse Gas Inventory

Global

In 2021, worldwide anthropogenic GHG emissions totaled 33,000 million metric tons (MMT) of CO₂e, which is a 48 percent increase from 1990 GHG levels (United States Environmental Protection Agency [USEPA] 2023). Additionally, in 2019, worldwide anthropogenic emissions totaled 49,758 million metric tons (MT) of CO₂e, which is a 53 percent increase from 1990 GHG levels. Specifically, 74.4 percent of CO₂e is from CO₂, 17.3 percent from CH₄, 6.2 percent from N₂O, and 2.1 percent from fluorinated gases were emitted in 2019. The largest source of GHG emissions were energy production and use (including fuels used by vehicles and buildings), which accounted for 73.2 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 18.4 percent and 5.2 percent, respectively. Waste sources contributed to 3.2 percent (Our World in Data 2023).

Federal

Total U.S. GHG emissions in 2021 were 6,340 MMT of CO₂e. Emissions decreased by approximately 3.0 percent from 2019 to 2021; since 1990, total U.S. emissions have a total decrease of 2.3 percent between 1990 and 2021. The decrease from 2019 to 2021 reflects the combined influences of several long-term trends, including population changes, economic growth, energy market shifts, technological changes such as improvements in energy efficiency, and decrease carbon intensity of energy fuel choices. Overall, emission sources in the energy sector accounted for a combined 82 percent of total gross U.S. GHG emissions in 2021 (USEPA 2023). Over the period of 1990 to 2021, total emissions from the energy and waste sectors decreased by 171.4 MMT of CO₂e (3.2 percent) and 66.8 MMT of CO₂e (28.3 percent), respectively. Emissions from the industrial processes and product use, and agriculture sectors grew by 41.0 MMT of CO₂e (12.2 percent), and 50.0 MMT of CO₂e (9.1 percent), respectively (USEPA 2023).

California

Based on the California Air Resource Board (CARB) California GHG Inventory for 2000-2021, California produced 381.3 MMT of CO₂e in 2021, which is 36.9 MMT of CO₂e lower than 2019 levels (CARB 2021). The major source of GHG emissions in California is the transportation sector, which comprises 39 percent of the state's total GHG emissions. The industrial sector is the second largest source, comprising 22 percent of the state's GHG emissions while electric power accounts for approximately 11 percent magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO₂e. The annual 2030 statewide target emissions level is 260 MMT of CO₂e (CARB 2021).

Sonoma County

In July 2024, the Sonoma County Regional Climate Protection Authority (RCPA) updated the Sonoma County GHG inventory for the year 2022 emissions (RCPA 2024). The RCPA established a baseline community-wide inventory for 2010 and a historical inventory for 1990 as part of the Climate Action 2020 and Beyond report development process. Since then, the inventory has been updated at approximately two-year intervals, with new values provided for 2015, 2018, 2020, and 2022. RCPA completed this 2022 inventory update to help track progress toward achieving Sonoma County's short and long-term emissions reduction goals (RCPA 2024). With the adoption of the Sonoma Climate Mobilization Strategy in March 2021, RCPA set a new goal for Sonoma County to achieve carbon neutrality by 2030. This is even more ambitious than the previous goal of reaching 40 percent below 1990 levels by 2030 and will take significant effort.

Sonoma County emissions in 2022 were 3.11 MMT of CO₂e, which is over a 10 percent reduction from 2018 emissions of 3.46 MMT of CO₂e, but a slight 0.6 percent increase from 2020 emissions of 3.09 MMT of CO₂e. RCPA believes this small increase is because 2020 emissions were artificially low due to the impacts of the COVID-19 pandemic and the extended economic shutdown. Therefore, 2022 emissions should be viewed not as an increase from 2020 levels, but as a continued decrease from 1990-2018 levels, with 2020 being an outlier year that produced artificially low emission levels.

City of Cotati

The 2024 Sonoma County GHG Inventory 2022 Update includes GHG emission estimates for the City of Cotati in 2022. Of the 3.11 MMT of CO₂e estimated for 2022 for Sonoma County, 43,259 MT CO₂e are emitted by the City of Cotati (1.4 percent; RCPA 2024). Transportation accounts for the largest portion of GHG emissions, estimated at 30,106 MT of CO₂e, followed by building energy at 10,327 MT of CO₂e, solid waste at 2,744 MT of CO₂e, and water-related emissions at 81 MT of CO₂e. Compared to 2022 GHG emissions, the City of Cotati has achieved an 18 percent reduction below 1990 levels. Per capita GHG emission reductions in 2022 are even larger, showing a 36 percent reduction in GHG emissions compared to 1990 levels.

c. Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme

climate changes during the 21st century than were observed during the 20th century. Each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature from 2015 to 2017 was approximately 1.0°C higher than the average global mean surface temperature over the period from 1880 to 1900 (National Oceanic and Atmospheric Administration 2020). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations jointly indicate that Land-Surface Air Temperature and sea surface temperatures have increased.

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 0.6 to 1.1°C higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years (State of California 2018). In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state and regionally specific climate change case studies (State of California 2018). However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. A summary follows of some of the potential effects that could be experienced in California as a result of climate change.

Air Quality

Higher temperatures are conducive to air pollution formation and could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. As temperatures have increased in recent years, the area burned by wildfires has increased, and wildfires have been occurring at higher elevations in the Sierra Nevada Mountains (State of California 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality would worsen. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks (California Natural Resources Agency 2009).

In the San Francisco Bay Area region, changes in meteorological conditions under climate change will affect future air quality. Hotter future temperatures will act to increase surface ozone concentrations (State of California 2018). Increased wildfires from higher temperatures and more extreme droughts will lead to further air quality degradation during such fires.

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). This uncertainty regarding future precipitation trends complicates the analysis of

future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring snowpack in the western U.S., including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts (State of California 2018). The Sierra snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack (State of California 2018). Projections indicate that the average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (State of California 2018).

Like the rest of the State, the San Francisco Bay Area is expected to face a challenging combination of decreased water supply and increased water demand (State of California 2018). Melting snowpack, increasing seawater intrusion into groundwater, increasing rates of evapotranspiration, and levee failures or subsidence that contaminate Delta supplies will affect both the quantity of water available and the quality of supplies. Future increases in temperature, regardless of whether total precipitation goes up or down, will likely cause longer and deeper droughts, posing major problems for water supplies, natural ecosystems, and agriculture.

Hydrology and Sea Level Rise

Climate change could potentially affect the amount of snowfall, rainfall, and snowpack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for saltwater intrusion. Climate change has the potential to induce substantial sea level rise in the coming century (State of California 2018). The rising sea level increases the likelihood and risk of flooding. The rate of increase of global mean sea levels over the 2001-2010 decade, as observed by satellites, ocean buoys, and land gauges, was approximately 3.2 millimeters per year, which is double the observed 20th century trend of 1.6 millimeters per year (World Meteorological Organization [WMO] 2013). As a result, global mean sea levels averaged over the last decade were about 8 inches higher than those of 1880 (WMO 2013). Sea levels are rising faster now than in the previous two millennia, and this rise is expected to accelerate, even with robust GHG emission control measures. The IPCC predicts a mean sea level rise of 10 to 37 inches by 2100 (IPCC 2018). A rise in sea levels could erode 31 to 67 percent of southern California beaches, flooding approximately 370 miles of coastal highways during 100-year storm events, jeopardizing California's water supply due to saltwater intrusion, and inducing groundwater flooding and/or exposure of buried infrastructure (State of California 2018). Increased CO₂ emissions can cause oceans to acidify due to the carbonic acid it forms. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

In the San Francisco Bay Area, much of the transportation system (airports, roads, and railways) is concentrated along the bay where flooding from sea level rise and storm surge is a major vulnerability (State of California 2018). The effects of climate change will further exacerbate impacts from sea level rise and storm surge in the region.

Agriculture

California has an over \$50 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2020). Higher CO₂ levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2018). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

In the San Francisco Bay Area region, more frequent droughts and extreme temperatures could affect wine production, where 70 percent of California's grapes are grown (State of California 2018). This and other climate effects can contribute to higher food prices and shortages.

Ecosystems and Wildlife

Climate change and potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the annual average maximum daily temperatures in California could rise by 4.4 to 5.8°F in the next 50 years and by 5.6 to 8.8°F in the next century (State of California 2018). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals related to (1) timing of ecological events; (2) geographic distribution and range; (3) species' composition and the incidence of nonnative species within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2018).

Many of the impacts identified above would impact ecosystems and wildlife in the San Francisco Bay Area region. Increases in wildfire would further remove sensitive habitat; increased severity in droughts would potentially starve plants and animals of water; and sea level rise will affect sensitive coastal ecosystems, especially wetlands.

4.6.2 Regulatory Setting

a. Federal Regulations

Federal GHG Emissions Regulation

The U.S. Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 497) held that the USEPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act. The USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the USEPA issued a Final Rule that establishes the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the U.S. Supreme Court in *Utility Air Regulatory Group v. USEPA* (134 S. Ct. 2427 [2014]) held that USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The Court also held that Prevention of Significant Deterioration permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of best available control technology.

b. State Regulations

CARB is responsible for the coordination and oversight of State and local air pollution control programs in California. There are numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below.

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, the USEPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles, beginning with the 2009 model year, which allows California to implement more stringent vehicle emission standards than those promulgated by the USEPA. Pavley I regulates model years from 2009 to 2016 and Pavley II, now referred to as "LEV (Low Emission Vehicle) III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, the rules will be fully implemented, and new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011).

California Global Warming Solutions Act of 2006 (Assembly Bill 32, Senate Bill 32, and Assembly Bill 1279)

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT CO₂e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2008).

CARB approved the 2013 Scoping Plan update in May 2014 (CARB 2014). The update set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan.

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100. The 2017 Scoping Plan also

puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of 6 MT of CO₂e by 2030 and 2 MT of CO₂e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the state.

AB 1279, passed on September 16, 2022, creates a net zero GHG emissions goal to be achieved as soon as possible, but no later than 2045. In addition, AB 1279 aims to achieve and maintain net negative GHG emissions and ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. The bill would require updates to the scoping plan (once every five years) to implement various policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies.

In response to the passage of AB 1279 and the identification of the 2045 GHG reduction target, CARB published the Final 2022 Climate Change Scoping Plan in November 2022. The 2022 Update builds upon the framework established by the 2008 Climate Change Scoping Plan and previous updates while identifying new, technologically feasible, cost-effective, and equity-focused path to achieve California's climate target. The 2022 Update includes policies to achieve a significant reduction in fossil fuel combustion, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands (NWL) to reduce emissions and sequester carbon, and the capture and storage of carbon.

The 2022 Update assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan, addresses recent legislation and direction from Governor Newsom, extends and expands upon these earlier plans, and implements a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045, as well as taking an additional step of adding carbon neutrality as a science-based guide for California's climate work.

Renewables Portfolio Standard Program (Senate Bill 100)

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

PRC Sections 21083.05 and 21097 (Senate Bill 97)

SB 97, signed in August 2007, added Section 21083.05 to and repealed Section 21097 from the Public Resources Code (PRC). This bill acknowledges that climate change is an environmental issue that requires analysis in CEQA documents. In March 2010, the California Natural Resources Agency adopted amendments to the CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

Senate Bill 375

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 directs each of the State's 18 major Metropolitan Planning Organizations to prepare a "sustainable communities strategy" that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan. On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Association of Bay Area Governments (ABAG) was assigned targets of a 10 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035. In the ABAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

Public Resources Code Division 30, Part 3, Chapter 13.1 and Health and Safety Code Sections 39730.5-8 (Senate Bill 1383)

Adopted in September 2016, SB 1383 requires the CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

1. Methane – 40 percent below 2013 levels
2. Hydrofluorocarbons – 40 percent below 2013 levels
3. Anthropogenic black carbon – 50 percent below 2013 levels

The bill also requires the California Department of Resources Recycling and Recovery, in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Executive Order B-55-18

On September 10, 2018, Governor Brown issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

California Integrated Waste Management Act (Assembly Bill 341)

The California Integrated Waste Management Act of 1989, as modified by AB 341, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows a diversion of 75 percent of all solid waste by 2020, and annually thereafter. The California Department of Resources Recycling and Recovery is required to develop strategies to implement AB 341, including source reduction.

California Code of Regulations Title 24 (California Building Code)

The California Energy Commission (CEC) first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR] Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and

nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards is referred to as the California Green Building Standards Code (CALGreen) and was developed to help the State achieve its GHG reduction goals under Health and Safety Code Division 25.5 (e.g., AB 32) by codifying standards for reducing building-related energy, water, and resource demand, which in turn reduces GHG emissions from energy consumption, water storage and delivery, and other resource consumption activities. The purpose of CALGreen is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental air quality.” CALGreen is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. CALGreen establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

On August 11, 2021, the CEC adopted the 2022 Title 24 Standards, which went into effect on January 1, 2023. The 2022 standards continue to improve upon the previous (2019) Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings (CEC 2022a). The 2022 Title 24 Standards “build on California’s technology innovations, encouraging energy efficient approaches to encourage building decarbonization, emphasizing in particular on heat pumps for space heating and water heating. This set of Energy Codes also extends the benefits of photovoltaic and battery storage systems and other demand flexible technology to work in combinations with heat pumps to enable California buildings to be responsive to climate change. This Energy Code also strengthens ventilation standards to improve indoor air quality. This update provides crucial steps in the state’s progress toward 100 percent clean carbon neutrality by midcentury” (CEC 2022b). The 2022 Energy Code is anticipated to reduce GHG emissions by 10 MMT of CO₂e over the next 30 years and result in approximately \$1.5 billion in consumer savings (CEC 2022c). Compliance with Title 24 is enforced through the building permit process.

c. Local Regulations

Bay Area Air Quality Management District

Cotati is located in the San Francisco Bay Area Air Basin, which is under the jurisdiction of Bay Area Air Quality Management District (BAAQMD). BAAQMD is responsible for enforcing standards and regulating stationary sources in their jurisdiction. BAAQMD regulates GHG emissions through specific rules and regulations as well as project and plan level emissions thresholds for GHGs to ensure that the Bay Area contributes to its fair share of emissions reductions. In 2017, BAAQMD published the 2017 Clean Air Plan, which includes policy approaches, control measures, and technical programs that will help the region make progress toward the 2050 GHG emissions goal of reducing GHG emissions by 2050 to 80 percent below 1990 levels (BAAQMD 2017). BAAQMD’s 2017 Clean Air Plan also contains guidance regarding compliance with AB 32, stating that AB 32 requires the reduction of statewide GHG emissions to 1990 levels by 2020, which may be satisfied by local jurisdictions through a 15-percent reduction from an emissions baseline established in 2008 or

earlier (BAAQMD 2017). In April 2022, BAAQMD adopted an updated CEQA Thresholds and Guidelines for evaluating the climate impacts of land use projects and plans (BAAQMD 2023).

Plan Bay Area 2050

Plan Bay Area 2050 is a state-mandated, integrated long-range transportation, land-use, and housing plan that would support a growing economy, provide more housing and transportation choices and reduce transportation-related pollution in the nine-county San Francisco Bay Area (ABAG/Metropolitan Transportation Commission 2021). Plan Bay Area 2050 serves the region's Sustainable Communities Strategy and builds on earlier efforts to develop an efficient transportation network and grow in a financially and environmentally responsible way. Plan Bay Area 2050 focuses on advancing equity and improving resiliency in the Bay Area by creating strategies in the following four elements: Housing, Economy, Transportation, and Environment. Plan Bay Area 2050 discusses how the future is uncertain due to anticipated employment growth, lack of housing options, and outside forces, such as climate change and economic turbulence. These uncertainties will impact growth in the Bay Area and exacerbate issues for those who are historically and systemically marginalized and underserved and excluded. Thus, Plan Bay Area 2050 has created strategies and considered investments that will serve those systemically underserved communities and provide equitable opportunities. Plan Bay Area 2050 presents a total of 35 strategies to outline how the \$1.4 trillion investment would be utilized. The strategies include, but are not limited to, the following: providing affordable housing, allowing higher-density in proximity to transit-corridors, optimizing the existing roadway network, creating complete streets, providing subsidies for public transit, reducing climate emissions, and expanding open space area. To bring these strategies to fruition, it will require participation by agencies, policymakers, and the public. An implementation plan is also included as part of Plan Bay Area 2050 to assess the requirements needed to carry out the strategies, identify the roles of pertinent entities, create an appropriate method to implement the strategies, and create a timeline for implementation.

Regional Climate Protection Authority

The RCPA was formed in 2009 to coordinate countywide climate protection efforts in Sonoma County's nine cities and multiple agencies. In 2019 RCPA adopted a Strategic Plan that outlines goals, objectives, and outcomes for RCPA to mobilize regional climate action in Sonoma County (RCPA 2024). RCPA has also adopted a 2030 Climate Emergency Mobilization Strategy in March 2021, which builds upon the 2016 Climate Action 2020 and Beyond plan. The Climate Emergency Mobilization Strategy is a 10-year strategy that includes 13 countywide strategies under local jurisdictions to reduce the effects of climate change, with a goal of carbon neutrality by 2030, a more ambitious goal than the CA 2020 goal of 40 percent below 1990 levels by 2030 (RCPA 2024).

The City of Cotati participated in the countywide Climate Action 2020 and Beyond Plan, completed in 2016, as well as the Climate Emergency Mobilization Strategy adopted in 2021.

City of Cotati General Plan

The City of Cotati General Plan contains greenhouse goals, objectives, and policies for the City. The Circulation Element includes the following goal and policies related to reducing vehicle trips through the provision of alternative modes of transportation, which would reduce air quality emissions from mobile sources. More information regarding these goals and policies is available in Section 4.2, *Air Quality*.

4.6.3 Impact Analysis

a. Significance Thresholds and Methodology

Based on Appendix G of the *CEQA Guidelines* a project may be deemed to have a significant impact on GHG emissions if it would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

The City of Cotati does not have a qualified CAP that meets the criteria under *CEQA Guidelines* Section 15183.5(b); therefore, this analysis presented below is based on project consistency with BAAQMD's building and transportation design elements threshold. BAAQMD's project-level thresholds can be applied to this analysis because future developments facilitated by this project by default would be required to comply with BAAQMD project-level thresholds.

Specific Thresholds of Significance

The construction of individual development projects does not generate enough GHG emissions to create significant project-specific environmental effects. However, the environmental effects of a project's GHG emissions can contribute incrementally to cumulative adverse environmental effects that are significant, contributing to climate change, even if an individual project's environmental effects are limited (*CEQA Guidelines* Section 15064[h][1]). The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether a project's contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines* Section 15064[h][1]).

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions. *CEQA Guidelines* Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see *CEQA Guidelines* Section 15064.7[c]).

According to the *CEQA Guidelines*, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (AEP) in their white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions (AEP 2016). Although the City of Cotati is a participant in the RCPA's Climate Emergency Mobilization Strategy that has an aggressive carbon neutrality by 2030 target, that strategy does not meet the criteria under *CEQA Guidelines* Section

15183.5(b)(1)(D) and 15183.5(b)(1)(E) since it does not quantify or provide substantial evidence that measures in the document would achieve such a goal, and does not establish a mechanism to monitor the plan's progress towards achieving the goal or require an amendment if the plan fails to achieve the specified levels. BAAQMD recently adopted updated thresholds for evaluating the significance of climate impacts from development projects (BAAQMD 2023). The new project-level thresholds state that development projects must either include the following project design elements, or be consistent with a local GHG reduction strategy that meets the criteria under *CEQA Guidelines* Section 15183.5(b):

1. Buildings

- a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
- b. The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under Public Resources Code Section 21100(b)(3) and Section 15126.2(b) of the *CEQA Guidelines*.

2. Transportation

- a. The project will achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target that reflects the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory: *Evaluating Transportation Impacts in CEQA*:
 - i. Residential projects: 15 percent below the existing VMT per capita
 - ii. Office projects: 15 percent below the existing VMT per employee
 - iii. Retail projects: no net increase in existing VMT
- b. The project will achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
Threshold 2:	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT BE CONSISTENT WITH BAAQMD'S BUILDING AND TRANSPORTATION THRESHOLDS. EVEN WITH IMPLEMENTATION OF PROPOSED MITIGATION MEASURE GHG-1, THIS IMPACT WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.

As discussed above under Section 4.6.1(a), *Significance Thresholds and Methodology*, since the City of Cotati does not have a qualified CAP that meets the criteria under *CEQA Guidelines* Section 15183.5(b), this analysis is based on project consistency with BAAQMD's building and transportation design elements threshold.

The proposed project would facilitate denser development within the SWSP area and on the TOC parcels through revisions to development standards and updates to design standards, ultimately allowing for more infill development to be constructed on these sites. Further, the project would

also be consistent with MTC's TOC Policy, which is a framework designed to promote sustainable, equitable development around key transit hubs in the San Francisco Bay Area. The proposed project establishes a course for TOC policy compliance which emphasizes the integration of housing, commercial development, and transportation infrastructure within a 0.5-mile radius of major the Cotati SMART Station. The TOC policy applies to all parcels within the project area. Therefore, the proposed project would be consistent with consistency with the State and MTC's goals for reducing VMT and GHG through strategic development.

Development facilitated by the project would be required to comply with General Plan policies; Goal CON 3 of the Conservation Element includes policies that promote the usage of energy from renewable sources to reduce GHG emissions and the production of renewable energy. These would include Policies CON 3.1, CON 3.2, and CON 3.2, which require new buildings to comply with CALGreen Tier 1 standards, encourage the exceedance of CALGreen Tier 1 standards, and encourage the use of alternative energy sources.

In addition, the City of Cotati is currently provided 100 percent renewable electricity through Sonoma Clean Power's EverGreen Program. While these policies may support the electrification of new development that precludes the use of natural gas, it is not required through any General Plan policy or City requirement. Therefore, future development facilitated by the project could still include natural gas appliances. As a result, future development facilitated by the proposed project would be inconsistent with BAAQMD threshold 1.a, and impacts would be potentially significant.

As discussed in Section 4.16.3, *Energy*, and Section 5.3, *Energy Effects*, development facilitated by the project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the CCR, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), and CALGreen (Title 24, Part 11 of the CCR), which would ensure that development facilitated by the project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Therefore, the proposed project would be consistent with BAAQMD threshold 1.b. and impacts would be less than significant.

Proposed Specific Plan policies that may have the effect of reducing GHG emissions include three key goals for transportation, circulation and mobility:

- Improve Multimodal Connections
- Improve SMART Station Access
- Support Bicycle & Vehicle Parking to Support New & Existing Land Uses

Furthermore, as discussed under Section 4.13, *Transportation*, the project is screened out of a VMT assessment as the Cotati SMART Station is an existing major transit station, and the entirety of the project area is within 0.5 mile of this station. Therefore, due to the VMT-reducing benefits of being located in close proximity to a major transit station, the project would be consistent with BAAQMD threshold 2.a.

As described above, General Plan policies would require privately constructed buildings to meet and comply with CALGreen Tier 1, and exceed them if feasible. The Specific Plan identifies two EV charging stations (ChargePoint Charging Station) located in the parking lot of the Cotati SMART station, and encourages additional EV charging stations as part of parking requirements. However, this would not meet CALGreen Tier 2 standards, which vary depending on size and type of use. As a result, future development facilitated by the project would be inconsistent with BAAQMD threshold 2.b and this impact would be potentially significant.

Mitigation Measures

GHG-1 Consistency with BAAQMD's Project-Level GHG Threshold

The following shall be a condition of approval for future developments facilitated by the project:

Greenhouse Gas Emissions Reductions. Development under the Specific Plan and on the TOC parcels shall not include natural gas appliances or natural gas plumbing.

EV Charging. Development under the Specific Plan and on the TOC parcels shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

Significance After Mitigation

Implementation of Mitigation Measure GHG-1 would ensure that future development facilitated by the proposed project would be consistent with BAAQMD thresholds 1.a. and 2.b. However, due to legal uncertainty with a jurisdiction's ability to enforce natural gas bans² and potential economic and/or technological infeasibility of meeting CALGreen Tier 2 standards, it is unknown at this time if all future development facilitated by the project would be able to implement these measures and be consistent with BAAQMD thresholds 1.a. and 2.b. Therefore, this impact would remain significant and unavoidable even with mitigation.

4.6.4 Cumulative Impacts

GHG emissions generated by development facilitated by the project are inherently cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the GHG emissions from past, present, and future projects and activities have contributed, currently are contributing, and would contribute to global climate change and its associated environmental impacts. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future projects listed in Table 3-1 (refer to Section 3, *Environmental Impact Analysis*) located in the vicinity of the project area in addition to the proposed project.

Cumulative development would generate GHG emissions from vehicle trips, electricity and water use, and other sources. The analysis of GHG emissions is cumulative in nature, as emissions affect the accumulation of GHGs in the Earth's atmosphere. Projects that fall below thresholds are considered to have a less than significant impact, both individually and cumulatively. However, GHG emissions are of global concern and cumulative GHG emissions are considered to be significant. As indicated under Impact GHG-1, despite implementation of Mitigation Measure GHG-1, implementation of the proposed project would not be consistent with State GHG reduction plans. As such, the project would result in a considerable contribution to cumulative GHG emission impacts.

² Pursuant to case law *California Restaurant Association v. City of Berkeley*, the 9th Circuit Appellate Court found that a city cannot ban natural gas because they are preempted from doing so by federal law under the Energy Policy and Conservation Act.

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4.7 Hazards and Hazardous Materials

This section addresses impacts associated with exposure to hazards and hazardous materials from implementation of the proposed project. Specifically, this analysis addresses impacts related to hazardous materials use and transportation, the accidental release of hazardous materials, new development or re-development on contaminated sites, air traffic hazards, and interference with emergency response and evacuation plans.

4.7.1 Setting

a. Fundamentals

Hazards

A hazard is a situation that poses a level of threat to life, health, property, or the environment. Hazards can be dormant or potential, with only a theoretical risk of harm. However, once a hazard becomes active, it can create an emergency. A hazardous situation that has already occurred is called an incident. Emergency response is action taken in response to an unexpected and dangerous occurrence in an attempt to mitigate its impact on people, structures, or the environment. Emergency situations can range from natural disasters to hazardous materials releases and transportation incidents.

Hazardous Materials

Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when handled, disposed, or otherwise managed improperly. Hazardous materials are grouped into the following four categories, based on their properties:

- Toxic—causes human health effects
- Ignitable—has the ability to burn
- Corrosive—causes severe burns or damage to materials
- Reactive—causes explosions or generates toxic gases

A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. The criteria that define a material as hazardous also define a waste as hazardous. Soil or groundwater contaminated with hazardous materials above specified regulatory state or federal thresholds is considered hazardous waste if it is removed from a site for disposal. If improperly handled, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater with concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. The California Code of Regulations, Title 22, Sections 66261.20-24 contain technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

Hazardous Building Materials

Many older buildings contain building materials that consist of hazardous materials. These materials include lead-based paint, asbestos-containing material, and polychlorinated biphenyls (PCBs).

Prior to the United States Environmental Protection Agency (USEPA) ban in 1978, lead-based paint was commonly used on interior and exterior surfaces of buildings. Disturbances such as sanding and scraping activities, renovation work, gradual wear and tear, old peeling paint, and paint dust particulates have been found to contaminate surface soils or cause lead dust to migrate and affect indoor air quality. Exposure to residual lead can cause severe health effects, especially in children.

Asbestos is a naturally occurring fibrous material that was extensively used as a fireproofing and insulating agent in building construction materials before such uses were banned by the USEPA in the 1970s due to harmful health effects. In addition, many types of electrical equipment contained PCBs as an insulator, including transformers and capacitors. After PCBs were determined to be a carcinogen in the mid to late 1970s, the USEPA banned PCB use in new equipment and began a program to phase out certain existing PCB-containing equipment. For example, fluorescent lighting ballasts manufactured after January 1, 1978, do not contain PCBs and are required to have a label clearly stating that PCBs are not present in the unit.

Hazardous Substances

A hazardous substance can be any biological, natural, or chemical substance, whether solid, liquid, or gas, that may cause harm to human health. Hazardous substances are classified on the basis of their potential health effects, whether acute (immediate) or chronic (long-term). Dangerous goods are classified on the basis of immediate physical or chemical effects, such as fire, explosion, corrosion, and poisoning. An accident involving dangerous goods could seriously harm human health or damage property or the environment. Harm to human health may happen suddenly (acute), such as dizziness, nausea, and itchy eyes or skin; or it may happen gradually over years (chronic), such as dermatitis or cancer. Some people can be more susceptible than others. Hazardous substances and dangerous goods can include antiseptic used for a cut, paint for walls, a cleaning product for the bathroom, chlorine in a pool, carbon monoxide from a motor vehicle, fumes from welding, vapors from adhesives, or dust from cement, stone, or rubber operations. Such hazardous substances can make humans very sick if they are not used properly.

Hazardous Materials Listing

The Cortese List is a list of known hazardous materials, including hazardous waste facilities, that meet one or more of the provisions of Government Code Section 65962.5, including:

- The list of hazardous waste and substances sites from the California Department of Toxic Substances Control (DTSC) EnviroStor database.
- The list of leaking underground storage tank (LUST) sites by county and fiscal year from the State Water Resources Control Board (State Water Board) GeoTracker database.
- The list of solid waste disposal sites identified by the State Water Board with waste constituents exceeding hazardous waste levels outside the waste management unit.
- The list of active cease-and-desist orders and cleanup and abatement orders from the State Water Board.
- The list of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, as identified by DTSC.

b. Presence of Hazardous Materials

According to databases of hazardous material sites maintained by the DTSC (EnviroStor) and the SWRCB (GeoTracker), hazardous sites are either “Completed-Case Closed” in the vicinity of the project area (DTSC 2024; SWRCB 2024a). Sites that are identified as “Completed – Case Closed” are sites that have completed remedial or cleanup actions and a formal closure decision document has been issued for the site (SWRCB 2024b). Within the project area, there are no identified open or active hazardous materials sites. The closest open assessment site which is currently under remedial action is Beacon Station – 7716 Old Redwood Highway, Cotati located approximately 310 feet northwest of Transit Oriented Community (TOC) parcel, 501 E Cotati Ave. There are three closed LUST Cleanup Sites in the project area at the following addresses: 1015 East Cotati Avenue, 766 East Cotati Avenue, and 100 Santero Way. The most recent site (100 Santero Way) was closed in 2010.

Natural gas pipelines are located along Old Redwood Highway and south of State Route 116. However, US Highway 101, an identified Class 1 – Explosives transportation route is located approximately 4,000 feet west of the project area (Federal Motor Carrier Safety Administration 2024). There are no solid waste disposal sites identified by the State Water Board with waste constituents exceeding hazardous waste levels outside the waste management unit within the county. The nearest site is located within the City of Vallejo, approximately 34 miles southeast of Cotati (California Environmental Protection Agency [CalEPA] 2024a). There are two active cease-and-desist and cleanup and abatement orders sites within the city located at 6700 Gravenstein Highway and 7675 Old Redwood Highway located approximately 3 miles northwest and 0.9-mile northwest of TOC parcel 475 E Cotati Ave (CalEPA 2024b). There are no hazardous waste facilities subject to corrective action pursuant to Section 25187.5 within or near the city (CalEPA 2024c).

c. Proximity to Schools

School locations require consideration, because children are particularly sensitive to hazardous materials exposure. The city also includes sensitive land uses such as hotels and motels; group homes, churches; other learning institutions; and libraries. The Cotati Rohnert Park Unified School District (CRPUSD) provides public school services to the City of Cotati. CRPUSD operates six elementary schools, three middle schools, and three high schools (CRPUSD 2024). The closest school to the project area is University Elementary School, located approximately 0.14-mile to the southwest of the SWSP area.

d. Airports and Aircraft Hazards

There are no public or private airports in Cotati, and the nearest airport is the Petaluma Municipal Airport located approximately 7.7 miles southeast of the City. Additionally, no portion of the City is identified as within an airport influence area or airport safety zone (County of Sonoma 2024a).

4.7.2 Regulatory Setting

a. Federal Regulations

The USEPA is the agency primarily responsible for enforcement and implementation of federal laws and regulations pertaining to hazardous materials. Applicable federal regulations pertaining to hazardous materials are contained in Code of Federal Regulations (CFR) Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. The management of hazardous materials is governed by the following laws:

- Resource Conservation and Recovery Act of 1976 (RCRA) (42 U.S. Code [USC] 6901 et seq.);
- Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA, also called the Superfund Act) (42 USC 9601 et seq.);
- Superfund Amendments and Reauthorization Act (SARA) of 1986 (Public Law 99 499); and
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) (7 USC 136 et. Seq.).

These laws and associated regulations include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. USEPA provides oversight and supervision for Federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA)

These acts established a program administered by the USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the “cradle to grave” system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA.

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (enacted 1980), amended by the Superfund Amendments and Reauthorization Act (SARA) (1986)

This law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled revision of the National Contingency Plan (NCP), which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List (NPL).

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

FIFRA (7 USC 136 et seq.) provides Federal control of pesticide distribution, sale, and use. USEPA was given authority under FIFRA not only to study the consequences of pesticide usage, but also to require users (farmers, utility companies, and others) to register when purchasing pesticides. Later amendments to the law required users to take exams for certification as applicators of pesticides. All pesticides used in the United States must be registered (licensed) by the USEPA. Registration assures that pesticides will be properly labeled and that, if used in accordance with specifications, they will not cause unreasonable harm to the environment.

Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations

Regulations for Lead-Based Paint (LBP) are contained in the Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations (CFR) Part 35, governed by the U.S. Housing and Urban Development (HUD), which requires sellers and lessors to disclose known LBP and LBP hazards to prospective purchasers and lessees. Additionally, all LBP abatement activities must be in compliance with

California and Federal OSHA and with the State of California Department of Health Services requirements. Only LBP trained and certified abatement personnel are allowed to perform abatement activities. All lead LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

Code of Federal Regulations

Title 49 of the CFR provides regulations for transportation, covering everything from how transportation systems are built to how they should operate safely. This title ensures that transportation infrastructure and operations meet safety and efficiency requirements, and it provides the framework for regulatory oversight and enforcement in the transportation sector.

Federal Clean Air Act

The USEPA is charged with implementing national air quality programs. USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), passed in 1963 by the U.S. Congress and amended several times. The 1970 federal CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including non-attainment requirements for areas not meeting NAAQS and the Prevention of Significant Deterioration program. The 1990 federal CAA amendments represent the latest in a series of federal efforts to regulate air quality in the United States. The CAA includes regulations for the control of asbestos during demolition or renovation activities.

Emergency Response Plans

Presidential Directive HSPD 5 identifies steps for improved coordination in response to incidents and requires a National Response Plan (NRP) and a National Incident Management System (NIMS). NIMS is a comprehensive, national approach to incident management developed to improve the coordination of federal, State, and local emergency response nationwide. The State of California's NIMS Advisory Committee issued "California Implementation Guidelines for the National Incident Management System" to assist local governments and other entities to incorporate NIMS into already existing programs, plans, training and exercises.

The foundation of California's emergency planning and response is a statewide mutual aid system that is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to use within their jurisdiction, and outside their area. These plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all state agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

California Government Code Section 8568, the "California Emergency Services Act," states that "the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof." The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the act are further reflected and expanded on by appropriate local

emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies. The SEMS incorporates the functions and principles of the Incident Command System (ICS), the Master Mutual Aid Agreement (MMAA), existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination (California Office of Emergency Services [CalOES] 2022). Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs (CalOES 2024). The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and state (CalOES 2022). CalOES divides the state into six mutual aid regions. The City of Cotati is located in Mutual Aid Region II, which includes Del Norte, Humboldt, Mendocino, Lake, Sonoma, Marin, Napa, Solano, Contra Costa, San Francisco, Alameda, San Mateo, Santa Clara, Santa Cruz, San Benito, and Monterey Counties (CalOES 2024).

In an emergency, governmental response is an extension of responsibility and action, coupled with normal day-to-day activity. Normal governmental duties will be maintained, with emergency operations carried out by those agencies assigned specific emergency functions.

The Sonoma County/Operational Area Emergency Operations Plan (discussed further below) addresses the planned response to extraordinary emergency situations associated with large-scale disasters, identifies roles and responsibilities of departments within the county, and identifies hazards that might affect the Operational Area (County of Sonoma 2024b).

b. State Regulations

Department of Toxic Substances Control

As a department of the CalEPA, the DTSC is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code.

DTSC also administers the California Hazardous Waste Control Law (HWCL) to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the USEPA approves the California program, both state and federal laws apply in California. The HWCL lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the SWRCB, and California Department of Resources Recycling and Recovery (CalRecycle) to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

California Department of Pesticide Regulation, Department of Food and Agriculture, and the Department of Public Health

The California Department of Pesticide Regulations (DPR), a division of CalEPA, in coordination with the California Department of Food and Agriculture (CDFA), a division of Measurement Standards and the California Department of Public Health (CDPH), have the primary responsibility to regulate pesticide use, vector control, food, and drinking water safety. DPR registers pesticides, and pesticide use is tracked by Sonoma County.

California Code of Regulations

Title 8, Section 1529 regulates asbestos exposure in all construction work including but not limited to: demolition or salvage of structures where asbestos is present; removal or encapsulation of materials containing asbestos; construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof, that contain asbestos; installation of products containing asbestos; asbestos spill/emergency cleanup; transportation, disposal, storage, containment of and housekeeping activities involving asbestos or products containing asbestos, on the site or location at which construction activities are performed; excavation which may involve exposure to asbestos as a natural constituent which is not related to asbestos mining and milling activities; routine facility maintenance; and erection of new electric transmission and distribution lines and equipment, and alteration, conversion and improvement of the existing transmission and distribution lines and equipment.

Title 8, Section 1532.1 of the CCR applies to all construction work where an employee may be occupationally exposed to lead. All construction work excluded from coverage in the general industry standard for lead by section 5198(a)(2) is covered by this standard. Construction work is defined as work for construction, alteration and/or repair, including painting and decorating.

Title 13 of the CCR Title 13 of the CCR regulates the transportation of hazardous materials by designating appropriate hazard labels shipping preparation, vehicle loading, and hazardous materials registration, among other requirements.

The Division of Occupational Safety and Health (Cal/OSHA)

Cal/OSHA protects and improves the health and safety of working men and women in California and the safety of passengers riding on elevators, amusement rides, and tramways – through the following activities: setting and enforcing standards; providing outreach, education and assistance; issuing permits, licenses, certifications, registrations, and approvals.

c. Regional and Local Regulations

Bay Area Air Quality Management District (BAAQMD)

Regulation 11, Rule 2, *Asbestos Demolition, Renovation and Manufacturing*, controls the emissions of asbestos to the atmosphere during demolition, renovation, milling and manufacturing and establishes appropriate waste disposal procedures.

Sonoma County Fire Prevention and Hazardous Materials Division

Fire Prevention and Hazardous Materials Division is primarily responsible for programs, procedures, and projects for preventing the outbreak of fires within the unincorporated areas of the county. The Hazardous Materials Unit regulates the storage, handling, and processing of hazardous materials through the CUPA program. The Division is the CUPA for the City of Cotati. The goal of the Division is to minimize the danger to persons and damage to property caused by fires. In addition to code adherence, Division staff is responsible for hazardous materials incident response, fire investigations, and emergency scene management support at emergencies.

Sonoma County Multijurisdictional Hazard Mitigation Plan

Sonoma County prepared a hazard mitigation plan in compliance with the federal Disaster Mitigation Act of 2000 and updates the plan every five years, with the most recent update in 2021. The hazard mitigation plan defines measures to reduce risks from natural disasters in the Sonoma County Operational Area, which consists of the entire county, including unincorporated areas, incorporated cities, and special purpose districts. The plan complies with federal and state hazard mitigation planning requirements to establish eligibility for funding under Federal Emergency Management Agency (FEMA) grant programs for all planning partners.

Sonoma County Emergency Operations Plan (EOP)

The Sonoma County EOP is a guidebook for the Sonoma County Operational Area to utilize during phases of an all-hazards emergency management process which include preparedness, response, recovery, and mitigation. The EOP is intended to facilitate coordination between agencies and jurisdictions within Sonoma County while ensuring the protection of life, property, and the environment during disasters. In accordance with California's Standardized Emergency Management System (SEMS), this Plan provides the framework for a coordinated effort between partners and provides stability and coordination during a disaster

Cotati Municipal Code

Section 14.04.110 of the CMC adopts the California Code of Regulations Title 24, Part 9, also known as the California Fire Code.

2015 Cotati General Plan

The following objective and policies from the Safety Element of the Cotati General Plan are related to hazardous materials:

Objective SA 3B: Protect Citizens from Dangers Related to the Movement, Storage and Manufacture of Hazardous Materials

Policy SA 3.14: Encourage producers and users of hazardous materials to reduce the amounts of hazardous materials generated.

Policy SA 3.15: Require hazardous waste generated within the City of Cotati to be disposed of in a safe manner, consistent with all applicable local, state and federal laws.

Policy SA 3.16: Hazardous materials shall be stored on site in a safe manner.

Policy SA 3.17: Coordinate with the Sonoma County Fire and Emergency Services Department to ensure that businesses in Cotati that handle hazardous materials prepare and file a Hazardous Materials Business Plan (HMBP). The HMBP shall consist of general business information; basic information on the location, type, quantity and health risks of hazardous materials; and emergency response and training plans.

4.7.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines* a project may be deemed to have a significant impact on hazards and hazardous materials if it would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
2. 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;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area;
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Methodology

The following section describes the potential environmental impacts of the proposed project relevant to hazards and hazardous materials. The impact analysis is based on an assessment of baseline conditions, including locations of hazardous materials use and storage, existing contaminated sites, and emergency response and evacuation plan requirements. This analysis

identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to the development that would be facilitated by the proposed project. However, the precise increase in hazardous materials transported within Cotati as a result of buildout of the proposed project cannot be predicted because specific development projects are not identified in the proposed project at a level of detail allowing such analysis. This analysis focuses on the potential nature and magnitude of risks associated with the accidental release, storage, transportation, and use of hazardous materials during operations of typical residential and retail-commercial developments that would be facilitated by the project.

b. Impact Analysis

Threshold 1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact HAZ-1 DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF POTENTIALLY HAZARDOUS MATERIALS. HOWEVER, COMPLIANCE WITH LOCAL, REGIONAL, STATE, AND FEDERAL REGULATIONS RELATED TO HAZARDOUS MATERIALS WOULD MINIMIZE HAZARDS TO THE PUBLIC OR ENVIRONMENT FROM THESE MATERIALS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Hazardous materials may be used by various commercial enterprises, as well as residential uses. In particular, dry cleaners use cleaning agents considered to be hazardous materials. Hardware stores typically stock paints and solvents, as well as fertilizers, herbicides, and pesticides. Swimming pool supply stores stock acids, algaecides, and caustic agents. Most commercial businesses occasionally use commonly available cleaning supplies that, when used in accordance with manufacturers' recommendations, are considered safe by the State of California, but when not handled properly can be considered hazardous. Private residences also use and store commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, State, and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest, which includes forms, reports, and procedures designed to seamlessly track hazardous waste.

Construction

The use of construction machinery would involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. Additionally, hazardous materials would be needed for fueling and servicing construction equipment. The U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration regulates the transportation of hazardous materials, as described in Title 49 of the CFR. Title 13 of the CCR additionally regulates the transportation of hazardous materials by designating appropriate hazard labels shipping preparation, vehicle loading, and hazardous materials registration, among other requirements. Documentation of compliance with hazardous materials regulations codified in Titles

8, 22, and 26 of the CCR is required for all hazardous materials and hazardous waste transport. In addition, individual contractors and property owners are required to comply with all applicable federal and State laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to, Title 49 of the CFR. Adherence to applicable regulations and laws would reduce the potential hazards associated with the transport of hazardous materials, including accidental release of hazardous materials during transport. These types of hazardous materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by County, State, and federal regulations and compliance with applicable standards discussed in Section 4.7.2, *Regulatory Setting*, would ensure impacts from construction-related hazardous materials would be less than significant.

Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials during construction. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Therefore, construction would not result in a hazard to the public or the environment through routine transport, use or disposal of hazardous materials, and this impact would be less than significant.

Operation

Development facilitated by the project would result in the addition of residential units and commercial development throughout the project area. Housing and other residential uses do not utilize substantial quantities of hazardous materials, and thereby pose little risk of exposing the public to hazardous materials. Commercial uses would be subject to compliance with CCR, Cal OSHA, and other agency requirements to ensure hazardous materials risks to the public are minimized during operational use and transport as well. Development of parcels within the project area may have unanticipated existing contamination and would be remediated through coordination with the appropriate regulatory agency pursuant to federal, State, and local regulations as listed in Section 4.7.2, *Regulatory Setting*.

Although the overall quantity of hazardous materials used and requiring disposal in Cotati could incrementally increase as a result of buildout of the proposed project, all new development that uses hazardous materials would be required to comply with the regulations, standards, and guidelines established by the USEPA, DTSC, and the CUPA related to storage, use, and disposal of hazardous materials.

Compliance with 2015 Cotati General Plan, Objective SA 3B and policies SA 3.14, SA 3.15, SA 3.16, and SA 3.17 would ensure that hazardous materials are used, disposed of, and stored properly so as to reduce potential risk to residents and workers within the city.

Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Therefore, operation would not result in a hazard to the public or the environment through routine transport, use or disposal of hazardous materials, and this impact would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold 2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact HAZ-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT 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. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Construction of development facilitated by the project would result in ground disturbance on parcels within the project area. The potential for release of contaminated materials during construction would be higher on or near closed or open LUST sites. Potential health and environmental impacts related to contaminated groundwater and soil may also occur during excavation and dewatering for new construction under the proposed project.

Development facilitated by the project would require project review by the City prior to issuance of permits. Upon project review, the City will determine if any special requirements apply based on site conditions. Special requirements could include preparation of a Phase I Environmental Site Assessment, implementation of a soil and groundwater management plan, and/or a dewatering and monitoring plan to ensure the discharge of clean water. In addition, development facilitated by the project would be subject to regulatory programs such as those overseen by the RWQCB and the DTSC. These agencies require applicants for development of potentially contaminated properties to perform investigation and cleanup if the properties are contaminated with hazardous substances.

It is also possible that underground storage tanks (UST) in use prior to permitting and record keeping requirements may be present in the project area. If an unidentified UST were uncovered or disturbed during construction activities, it would be removed under permit from the City; if such removal would potentially undermine the structural stability of existing structures, foundations, or impact existing utilities, the tank may be closed in place without removal. Tank removal activities could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks posed by USTs would be minimized by managing the tank according to existing standards contained in Division 20, Chapters 6.7 and 6.75 (UST Program) of the California Health and Safety Code as enforced and monitored by the Environmental Programs Division.

If construction requires dewatering, there is the possibility that groundwater contamination is identified. A characterization of the vertical and lateral extent of the contamination and remediation activities would be required by the Regional Water Quality Control Board (RWQCB) prior to the continuation of construction activities. If contamination exceeds regulatory action levels, the developer would be required to undertake remediation procedures prior to grading and development under the supervision of the RWQCB, depending upon the nature of any identified

contamination. Compliance with these regulatory requirements would ensure this impact remains less than significant.

Demolition

Development facilitated by the project would primarily consist of infill and redevelopment construction. Infill and redevelopment construction may involve the demolition of existing structures. Demolition could result in emissions of lead or asbestos if building materials contain these substances. However, lead-based materials and asbestos exposure are regulated by CalOSHA. CCR Section 1532.1 requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed CalOSHA standards. Under this rule, construction workers (and by extension, neighboring properties) may not be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over an eight-hour period and exposure must be reduced to lower concentrations if the workday exceeds eight hours. Similarly, CCR Section 1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers.

The control of asbestos during demolition or renovation of buildings is also regulated under the federal Clean Air Act. The Federal Clean Air Act requires a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers, and disposing of the asbestos-containing waste material as expeditiously as practicable (USEPA 2021). Compliance with applicable standards would ensure impacts related to hazardous materials are less than significant.

Friable asbestos-containing materials (ACMs) are regulated as a hazardous air pollutant under the Clean Air Act. As a worker safety hazard, they are also regulated under the authority of CalOSHA and by the Bay Area Air Quality Management District. In structures that would be demolished, any ACMs would be abated in accordance with State and federal regulations prior to the start of demolition or renovation activities and in compliance with all applicable existing rules and regulations, including the Bay Area Air Quality Management District. These programs would ensure that asbestos removal would not result in the release of hazardous materials to the environment that could impair human health. Therefore, the impact related to ACMs would be less than significant.

Fluorescent lighting ballasts manufactured prior to 1978, and electrical transformers, capacitors, and generators manufactured prior to 1977, may contain polychlorinated biphenyls (PCBs). In accordance with the Toxic Substances Control Act and other federal and State regulations, individual projects would be required to properly handle and dispose of electrical equipment and lighting ballasts that contain PCBs during demolition of older buildings, ensuring that the impact related to PCBs would be less than significant.

Operation

As described above in Section 4.7.2, *Regulatory Setting*, the Hazardous Materials Unit of Sonoma County's Fire Prevention and Hazardous Materials Division has been certified by CalEPA as the CUPA. As the CUPA, the Hazardous Materials Unit performs inspections to prevent exposure to environmental health hazards for businesses and residents in Cotati. Construction in the plan area of commercial facilities may include the development of businesses that involve the regular handling of hazardous materials.

Businesses that handle certain chemicals over threshold quantities are required to develop a Hazardous Materials Business Plan (HMBP) and submit the HMBP to the Hazardous Materials Unit. The HMBP consists of general business information; basic information on the location, type, quantity and health risks of hazardous materials; and emergency response and training plans. Hazardous materials must be reported in a HMBP if they are handled in quantities equal or greater than 55 gallons of a liquid, 200 standard cubic feet of a compressed gas, or 500 pounds of a solid. Mandatory reporting in HMBPs would reduce the potential hazard to residents and the general public in mixed-use development from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

For employees that would work with hazardous materials, the amounts of hazardous materials that are handled at any one time are generally small, reducing the potential consequences of an accident during handling. Business-specific practices would be required to comply with federal and State laws to eliminate or minimize the potential consequence of hazardous materials accidents. For example, employees who would work around hazardous materials are required to wear appropriate protective equipment, and safety equipment must be routinely available in all areas where hazardous materials are used. California Building and Fire Code requirements detail standards for the safe management of materials that present a moderate explosion hazard, high fire or physical hazard, or health hazards. Compliance with all applicable federal, State, and County requirements related to the storage of hazardous materials would maximize containment through safe handling and storage practices described above and provide for prompt and effective cleanup if an accidental release occurs.

In the event of a hazardous materials accident, the Sonoma County CUPA would respond. Commercial uses would be subject to compliance with California Code of Regulations and agencies such as Cal OSHA to ensure hazardous materials risks to the public are minimized as well.

Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Therefore, operational impacts from a hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold 3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-3 DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN HAZARDOUS EMISSIONS OR HANDLING OF HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN 0.25 MILE OF AN EXISTING OR PROPOSED SCHOOL. HOWEVER, COMPLIANCE WITH EXISTING REGULATORY REQUIREMENTS WOULD MINIMIZE RISKS TO SCHOOLS AND STUDENTS, RESULTING IN A LESS THAN SIGNIFICANT IMPACT.

The proposed project would facilitate infill development in Cotati. Residential uses typically do not emit or handle large quantities of hazardous materials or substances. Since the proposed project does not include specific development projects, the quantity of hazardous materials proposed for use by future commercial developments within the project area is currently unknown. However, commercial development facilitated by the proposed project could include uses that generate and emit hazardous materials, substances, or water. Exposure of persons to hazardous materials could occur in the following ways: improper handling or use of hazardous materials or hazardous wastes during construction or operation of future developments, particularly by untrained personnel; transportation accident; environmentally unsound disposal methods; or fire, explosion or other emergencies. Accidental release or combustion of hazardous materials at new commercial developments could endanger residents or students in the surrounding community. Potential development of commercial uses could occur within a 0.25-mile radius of existing public and private schools in Cotati. The closest school to the project area is University Elementary School, located approximately 0.14-mile to the southwest of the SWSP area. It is anticipated that movement of hazardous materials to and from the project area would use East Cotati Avenue, which does not pass by the nearest schools to the project area. Additionally, future development would be required to comply with the regulations, standards, and guidelines established by the USEPA, State, Sonoma County, and City of Cotati related to storage, use, and disposal of hazardous materials.

Hazardous materials and waste generated from future development would not pose a health risk to nearby schools because businesses that handle or have on-site storage of hazardous materials would be required to comply with the provisions of the California Fire Code adopted by the City (CMC Section 14.04.110) and the Hazardous Materials Unit CUPA requirements set forth in the California Health and Safety Code, Division 20, Chapter 6.95, Articles 1 and 2. All businesses that handle more than a specified amount of hazardous materials are required to submit a hazardous materials business plan to a regulating agency, in this case, the Hazardous Materials Unit. Compliance with existing regulations would reduce the potential for accidental exposure and hazards associated with the use and disposal of hazardous materials and protect schools from hazards and hazardous materials. Therefore, impacts of the proposed project on the emission of hazardous materials with 0.25 miles of schools would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

This impact would be less than significant without mitigation.

Threshold 4: Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact HAZ-4 DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN DEVELOPMENT ON SITES LISTED PURSUANT TO GOVERNMENT CODE SECTION 65962.5. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS RELATING TO SITE REMEDIATION WOULD MINIMIZE IMPACTS FROM DEVELOPMENT, RESULTING IN A LESS THAN SIGNIFICANT IMPACT.

As described in Section 4.7.1(b), *Presence of Hazardous Materials*, there are three closed LUST sites within the project area, but there are no active or open hazardous materials sites. The closed status of the three sites indicates that each site has completed remedial or cleanup actions and a formal closure decision document has been issued for the site. These sites have undergone investigation, remediation, and cleanup under the supervision of the RWQCB, the Sonoma County Hazardous Materials Unit, and/or DTSC, as appropriate. Therefore, while the project would facilitate development on sites listed pursuant to Government Code Section 65962.5, it is not anticipated that contamination from the site listings is present in the project area. Additionally, it should be noted that the project would not increase the likelihood for development to occur on hazardous materials sites compiled pursuant to Government Code Section 65962.5. instead, the project would increase the density and intensity of development on specific parcels.

If parcels within the project area become listed as hazardous materials sites prior to development, construction would be preceded by investigation, remediation, and cleanup under the supervision of the RWQCB, the Sonoma County Hazardous Materials Unit, and/or DTSC, before any development activities could begin as currently required by federal, State, and local regulations. The agency responsible for oversight would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells on site with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants.

Therefore, the project would not be located on an open or active hazardous material site that is listed pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. Furthermore, necessary remediation actions would be taken should any parcel within the project area become listed prior to development, in compliance with applicable regulations. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Impacts would be less than significant without mitigation.

Threshold 5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact HAZ-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT BE LOCATED WITHIN AN AIRPORT LAND USE PLAN OR WITHIN TWO MILES OF A PUBLIC AIRPORT AND PEOPLE RESIDING OR WORKING IN THE PLAN AREA WOULD NOT BE EXPOSED TO AIRPORT SAFETY HAZARDS OR EXCESSIVE NOISE. NO IMPACT WOULD OCCUR.

There are no public or private airports within the project area. The nearest airport is the Petaluma Municipal Airport located approximately 7.7 miles southeast of City limits. Additionally, no portion of the City is identified as within an airport influence area or airport safety zone. Therefore, the project would have no impact related to excessive safety or noise hazards within airport land use plan areas or in proximity to airports.

Mitigation Measures

No mitigation is required.

Level of Significance

No impact would occur.

Threshold 6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-6 DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN ADDITIONAL POPULATION AND VEHICLE MILES TRAVELED IN THE CITY. CONSTRUCTION OF DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD RESULT IN ROADWAY CONFLICTS AND WOULD REQUIRE MITIGATION. THE PROJECT WOULD NOT RESULT IN CHANGES TO EMERGENCY EVACUATION ROUTES NOR WOULD IT SUBSTANTIALLY INCREASE ROADWAY CONGESTION SUCH THAT THE USE OF AN EVACUATION ROUTE WOULD BE HINDERED. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction

Development facilitated by the project would entail the use of construction equipment and vehicles that would access the project area, which in turn could potentially temporarily impede evacuation or emergency vehicle access. The proposed project would be required to comply with the Sonoma County Multi-Hazard Mitigation Plan and the Sonoma County Emergency Operations Plan, ensuring efficient response to emergency incidents associated with emergencies affecting Sonoma County, including the City of Cotati. However, development facilitated by the project could result in roadway conflicts at construction sites from site access and circulation of slow-moving vehicles on local roadways. This impact would be potentially significant.

Operation

The project does not propose physical changes such as realigned or closed-off roadways or changes in general transportation circulation and access that would interfere or impair emergency response or evacuation within or through the project area. As such, the proposed project would also not

result in changes or hinder access to local roadways, which may serve as emergency evacuation routes, such as US Highway 101, State Route (SR) 116, and Old Redwood Highway.

Development facilitated by the project would accommodate future population growth and would increase vehicle miles traveled in the city and along emergency evacuation routes. This could lead to increased roadway congestion during emergency evacuations. Emergency vehicle access is discussed in Section 4.13, *Transportation*. Development facilitated by the project would also comply with road standards and would be reviewed by the City to ensure development would not interfere with evacuation routes and would not impede the effectiveness of evacuation plans.

Development facilitated by the project would result in population growth in Cotati. Population growth and large concentrations of people would incrementally increase traffic that could result in impacts to evacuation routes in Cotati and overburden adopted evacuation routes and other emergency response resources. However, the management of emergency response and emergency evacuations plans, including the Sonoma County Multi-Jurisdictional Hazard Mitigation Plan and the Sonoma County Emergency Operations Plan includes regular updates to these plans that incorporate new or proposed developments, such as anticipated development facilitated by the project. Thus, development facilitated by the project would be reflected in the regular and required updates of emergency and evacuation plans applicable to Cotati. Implementation of emergency and evacuation plans would further ensure that development facilitated by the project would not result in the impairment of implementation or physical interference with evacuation or emergency response plans.

Therefore, the project would not impair implementation of or physically interfere with evacuation or emergency response plans. The operational impact related to emergency response and evacuation plans would be less than significant.

Mitigation Measures

HAZ-6 *Traffic Control Plan*

A Traffic Control Plan (TCP) shall be developed prior to issuance of grading permits and implemented by the project applicant and/or their construction contractor(s) during construction of the proposed project. The TCP shall include but not be limited to:

- The TCP shall identify construction staging site locations and potential road closures, alternate routes for detours, and planned truck routes for construction-related vehicle traffic, including but not limited to haul trucks, material delivery trucks, and equipment delivery trucks. It shall also identify alternative safe routes and policies to maintain safety along bicycle and pedestrian routes during construction. Construction traffic routes shall avoid local residential streets to the maximum extent practicable. Staging locations, alternate detour routes, and construction traffic routes shall avoid other active construction projects within 0.25 mile of the project construction site to the maximum extent practicable.
- The TCP shall provide for traffic control measures including flag persons, warning signs, lights, barricades, cones, and/or detour routes to provide safe passage of vehicular, bicycle, and pedestrian traffic and access by emergency responders.
- Prior to the start of construction, written notice shall be provided regarding potential land and/or road closures as described in the plan. Notice shall be delivered to potentially affected properties within a 500-foot radius of the construction site. The notice shall contain a brief description of the work, work dates, and contact information of the City of Cotati Community Development Department. The notice shall be delivered ten calendar days prior to beginning

the work and again at two working days prior to beginning the work. A revised notice shall be delivered in the event of delays in schedule as soon as reasonably practicable after a delay is identified and the revised schedule is known.

The TCP shall be submitted to the City of Cotati Public Works and Engineering Department for review and approval prior to the issuance of a grading permit. The City of Cotati shall also ensure the plan is reviewed by emergency services personnel to ensure adequate emergency access is maintained throughout the construction period. The City shall confirm implementation of the plan during construction as part of routine site inspections.

Level of Significance

Mitigation Measure HAZ-6 requires the preparation of a Traffic Control Plan, which would ensure that construction vehicle traffic, road or lane closures or diversions, and other disturbances to local roadways resulting from construction activities are controlled in such a manner that the disturbance to existing vehicle, bicycle, and pedestrian traffic is not substantial. This measure would also ensure that emergency access routes are maintained, and emergency vehicles continue to have adequate access in the vicinity of construction sites. Therefore, construction impacts related to emergency response and evacuation would be less than significant with mitigation.

Threshold 7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact HAZ-7 DEVELOPMENT FACILITATED BY THE PROJECT WOULD BE LOCATED IN A BUILT URBAN ENVIRONMENT AND WOULD NOT RESULT IN PEOPLE OR STRUCTURES TO BE EXPOSED TO SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING WILDLAND FIRES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

According to the California Department of Forestry and Fire Protection (CAL FIRE), Cotati is not located in a Fire Hazard Severity Zone (CAL FIRE 2024). The nearest Fire Hazard Severity Zone is located approximately four miles east of the project area in the Sonoma Mountains. The project would facilitate infill development in an already built-up environment and would not introduce or increase risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.7.4 Cumulative Impacts

The geographic scope of the cumulative hazards and hazardous materials analysis is the project area and the surrounding vicinity within approximately 0.25 mile. The geographic scope for emergency plans and wildfire potential is the County of Sonoma. This geographic scope is appropriate because impacts related to hazards and hazardous materials tend to be localized, affecting individual sites and surrounding properties, and emergency plans and wildfire would affect the County. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Section 3, *Environmental Impact Analysis*) located in Cotati and Rohnert Park, in addition to the proposed project.

Cumulative projects have the potential to expose residents, employees, and visitors to hazards and hazardous materials through the routine use, storage, and disposal of hazardous materials; disturbance of previously unidentified contaminated soils or groundwater; or the demolition of structures that have the potential to contain hazardous building materials. However, the magnitude of hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. The types and sizes of anticipated cumulative development would not involve large quantities of hazardous materials or activities that transport or handle hazardous materials. Hazard evaluations would be completed on a case-by-case basis for all future development. Standard regulations requiring applicants to implement standard remediation (required testing, removal, and proper disposal) would minimize the potential for hazardous material releases related to contaminated soil, contaminated groundwater, and removal of hazardous building materials. Compliance with applicable regulations and implementation of appropriate mitigation measures, including remedial action on contaminated sites, would address impacts related to these hazards and hazardous materials associated with future development. Therefore, cumulative development would have a less than significant cumulative impact involving the transport, use, and disposal of hazardous materials; accidental release of hazardous materials; release of hazardous materials within 0.25 mile of a school; and risk of release and exposure to hazardous materials through reasonably foreseeable upset and accident conditions.

Cumulative projects may result in construction on sites listed pursuant to Government Code Section 65962.5. Such activity would be preceded by investigation, remediation, and cleanup under the supervision of the RWQCB, the Sonoma County Hazardous Materials Unit, and/or DTSC, before any development activities could begin as currently required by federal, State, and local regulations. The agency responsible for oversight would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells on site with annual reporting requirements, or other mechanisms to ensure cumulative development sites would not pose a health risk to workers or future occupants. Therefore, cumulative development would have a less than significant cumulative impact related to development of sites listed pursuant to Government Code Section 65962.5. Compliance with applicable regulations and implementation of appropriate mitigation measures, including remedial action on contaminated sites, would address impacts related to these hazards and hazardous materials associated with future development.

Cumulative development would not be located within an airport land use plan or within two miles of a public airport; therefore, cumulative impacts related to airport hazards would be less than significant.

The City of Cotati contains main arterial streets that would act as the most likely routes out of the City and provide access to Highway 101 or SR 116. Cumulative projects would result in predominantly infill development, would increase population, and could alter the existing street network. However, cumulative development would comply with emergency access requirements as required by the applicable City and Fire Department. Cumulative development would also be required to comply with the respective jurisdiction's regulations and policies regarding emergency access. Truck trips necessary to construct cumulative development would travel along truck routes designated by the respective jurisdictions. Cumulative development is not anticipated to redesign existing streets in such a way that would substantially impact emergency access, they would be required to mitigate such impacts. In addition, driveways associated with cumulative development would be constructed in compliance with the California Fire Code and CMC Section 17.36.100 or relevant jurisdiction regulations related to emergency access. Furthermore, similar to the proposed

project, cumulative projects may require the implementation of similar mitigation measures as Mitigation Measure HAZ-6 for a Traffic Control Plan, which would reduce potential cumulative impacts from construction activities. With adherence to the access and building code requirements described above, cumulative impacts would be less than significant.

The area surrounding the project area is characterized primarily by urban development, which is not immediately adjacent to any wildlands. Furthermore, future construction would be required to adhere to applicable Building Codes, which would minimize the potential for uncontrolled fires. Because of the distance to wildland fire areas, cumulative projects would not substantially increase exposure to wildland fires and associated impacts. Implementation of the Sonoma County Multi-Jurisdictional Hazards Mitigation Plan and the Sonoma County EOP would further reduce potential impacts related to emergency access and wildland fire. Cumulative impacts related to wildland fires would be less than significant.

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4.8 Hydrology and Water Quality

This section evaluates the potential environmental effects related to hydrology and water quality associated with implementation of the proposed project. It discusses the regional and local watershed characteristics, including water quality, drainage and infiltration patterns, and flood hazards. The analysis includes a review of surface water, groundwater, flooding, stormwater, and water quality. Water supply and wastewater conveyance are discussed in Section 4.15, *Utilities and Service Systems*. Impacts related to wetlands and waters of the U.S. are discussed in Section 4.3, *Biological Resources*.

4.8.1 Setting

The project area is located in central Sonoma County, in the central portion of a wide valley extending from Healdsburg to the San Pablo Bay. Coastal hills are located to the west and the Sonoma Mountains are located to the east. Elevations range from 110 to 130 feet above mean sea level, and the project area is relatively flat. Surface water runoff in the city is managed by a number of flood control channels and a piped storm drain system. Cotati is characterized by a typical Mediterranean climate, generally dry in the summer with mild, wet winters. Most rainfall occurs between October and April, with an average rainfall of 5.4 inches during February, the wettest month (Weather Spark 2024).

a. Surface Water

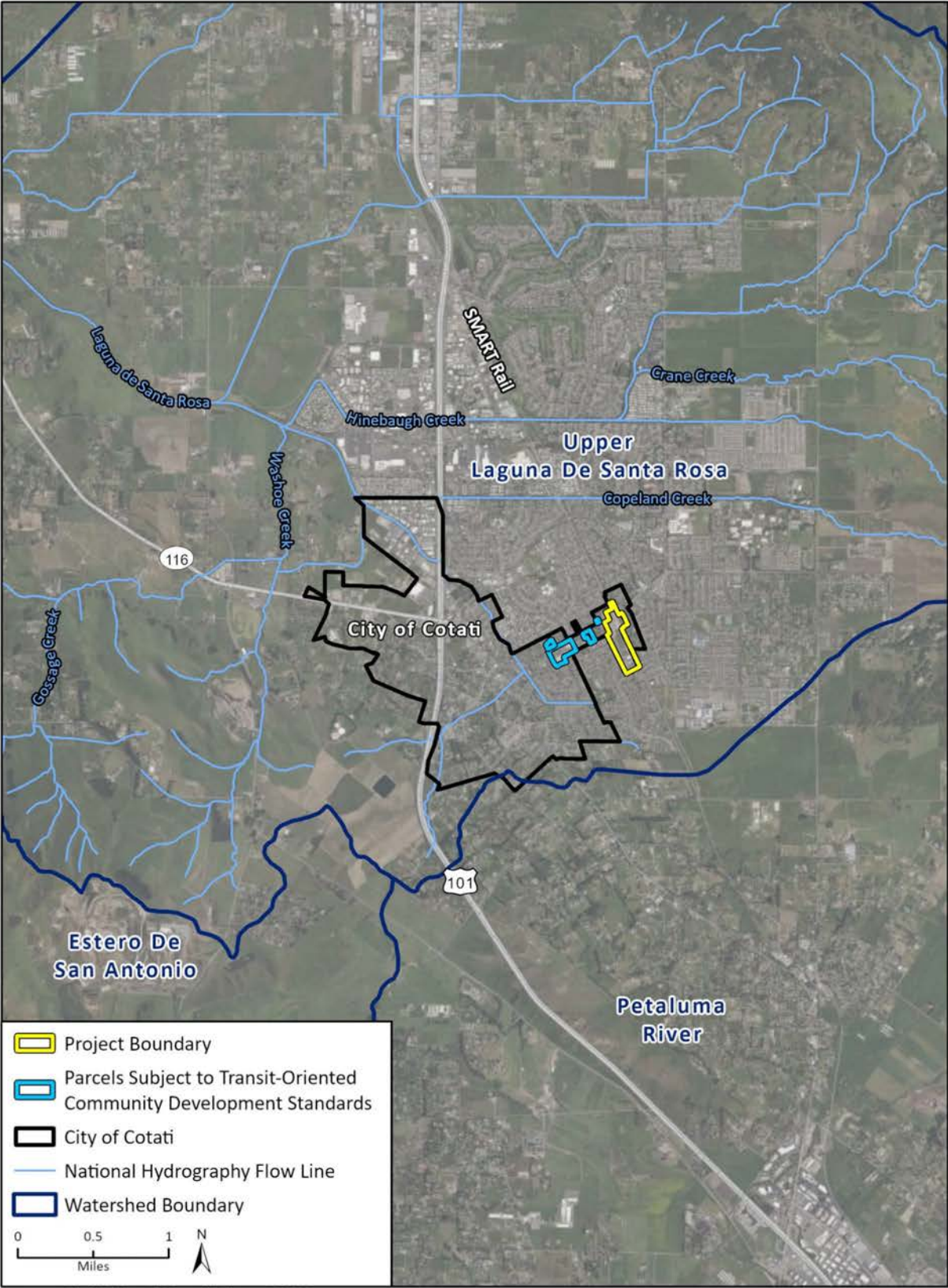
The California Department of Water Resources (DWR) divides surface watersheds in California into 10 hydrologic regions, which are further divided into hydrologic units. The entire project area and most of Cotati lies within the North Coast Hydrologic Region, which covers approximately 12.46 million acres, or 19,740 square miles, and includes all or portions of Modoc, Siskiyou, Del Norte, Trinity, Humboldt, Mendocino, Lake, and Sonoma counties (DWR 2022). Within the North Coast Hydrologic Region, Cotati and the project area are located within the Upper Laguna De Santa Rosa and San Pablo Hydrologic Units. The North Coast Regional Water Quality Control Board (NCRWQCB) governs basin planning and water quality within Cotati.

Cotati is adjacent to undeveloped open space with natural drainage features that flow through the urban development of the city via constructed drainage systems. The drainage network of Cotati consists of Laguna de Santa Rosa and its tributaries. Figure 4.8-1 depicts watershed boundaries within and near the city. For a description of jurisdictional features in project area, including wetlands, see Section 4.3, *Biological Resources*.

b. Groundwater

The Santa Rosa Valley Basin and Santa Rosa Plain Subbasin (1-55.01) occupies a northwest-trending structural depression in the southern part of the Coast Ranges of northern California and underlies most of Cotati (DWR 2020). The basin has a surface area of approximately 125 square miles (DWR 2020). The basin is bounded by the Russian River plain, mountains of the Mendocino Range, low hills that form a drainage divide that separates the Santa Rosa Valley from the Petaluma Valley basin, the Sonoma Mountains south of Santa Rosa, and the Mayacamas Mountains north of Santa Rosa (DWR 2004). Groundwater in this basin occurs primarily in the Merced Formation, which has a thickness ranging from 300 feet to greater than 1,500 feet. This formation is a marine deposit of fine sand and sandstone with thin interbeds of clay and silty-clay, some gravel, and localized fossils (DWR 2004).

Figure 4.8-1 Watershed Boundaries and Major Drainages



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Additional data provided by USGS, 2024.

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Fig 4.8-2 Watersheds Boundary

The basin has two aquifer systems, a shallow system (generally from ground level to 150 to 200 feet below ground level) and a deeper system separated by aquitards. The shallow aquifer system is primarily recharged by direct infiltration of precipitation and infiltration from streams. The deeper aquifer system comes from a combination of leakage from the overlying shallow aquifers and mountain-front recharge along the margins of the valley (Santa Rosa Plain Groundwater Sustainability Agency 2023). In Cotati, this mountain-front recharge zone is located generally east of the city along the foot of Sonoma Mountain. Groundwater basin boundaries are shown in Figure 4.8-2.

c. Water Supply

The City of Cotati operates a municipal water supply system. Approximately 75 percent of the city's water supply is provided by the Sonoma County Water Agency's (Sonoma Water) Russian River system, and the remaining 25 percent is from groundwater wells in the city (City of Cotati 2023). The City's water supply wells draw water from the deeper aquifer zones in the Santa Rosa Plain Subbasin.

See Section 4.15, *Utilities and Service Systems*, for additional details about water supply and demand for Cotati and the project area.

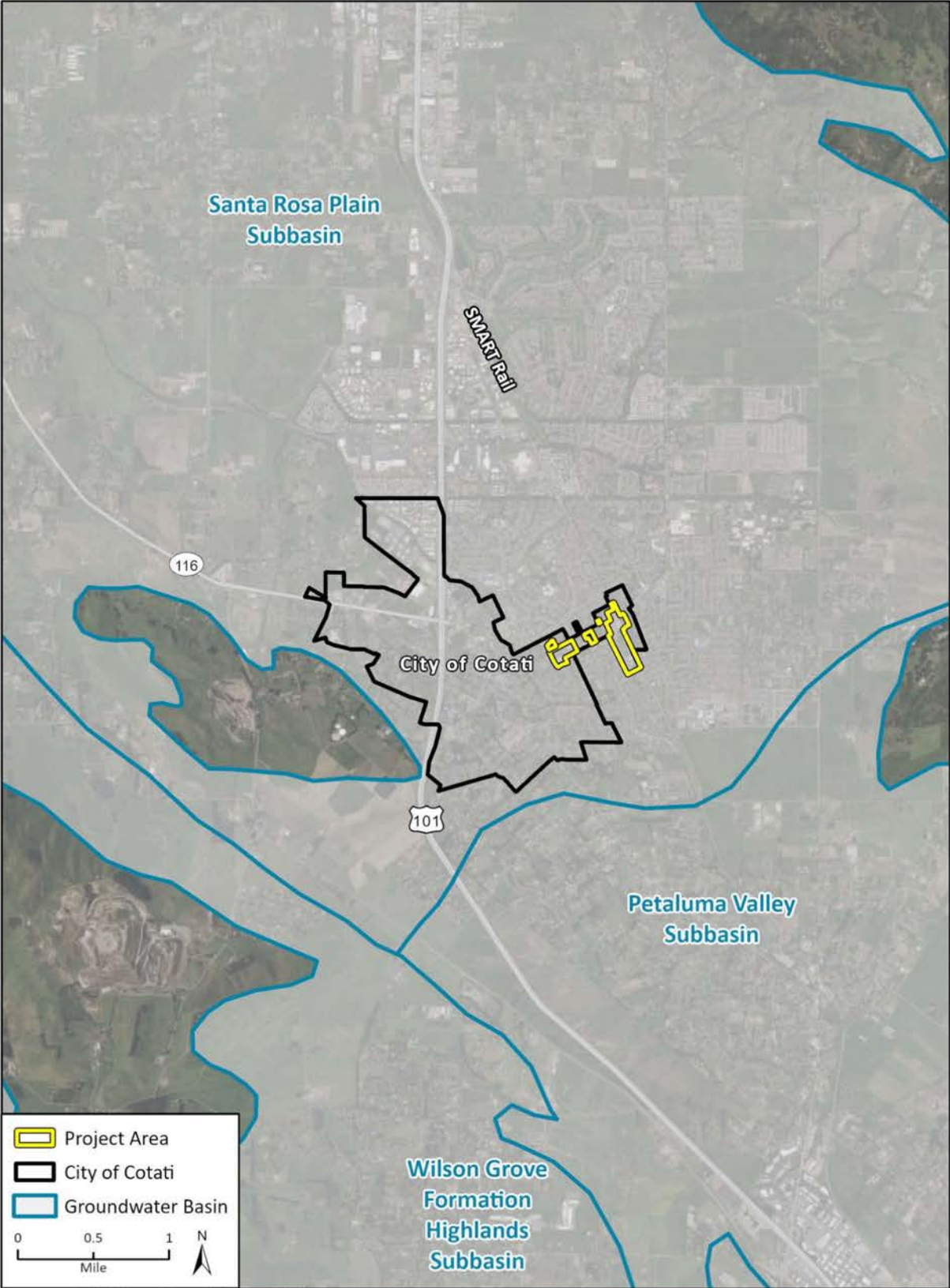
d. Water Quality

Stormwater and Urban Runoff

Water quality in Cotati is governed by the NCRWQCB, which sets water quality standards in the Water Quality Control Plan for the North Coast Region (Basin Plan). The Basin Plan identifies surface waterbodies and groundwater basins within the region that have beneficial uses. It also establishes water quality objectives and standards to maintain those beneficial uses, such as maximum contaminant levels. The Basin Plan identifies the following beneficial uses for the Laguna Hydrologic Subarea, which includes Cotati water bodies: agricultural supply, industrial service supply, groundwater recharge, freshwater replenishment, navigation, hydropower generation, water contact recreation, non-contact water recreation, commercial and sport fishing, warm freshwater habitat, cold freshwater habitat, wildlife habitat, rare/threatened/endangered species, migration of aquatic organisms, and spawning/reproduction/early development. Water quality issues in the basin arise primarily from polluted runoff discharges, which can include pesticides, fertilizers, green waste, animal waste, human waste, petroleum hydrocarbons such as gasoline and motor oil, trash, and other constituents of concern. Stormwater flowing over roadways and other transportation features carries urban pollutants through natural drainage systems or man-made storm drain structures to a body of surface water.

The Clean Water Act (CWA) 303(d) list is a register of impaired and threatened waters which states submit for United States Environmental Protection Agency (USEPA) approval. The list identifies all waters where pollution control measures have so far been unsuccessful in reaching or maintaining water quality standards. Waters that are listed are known as "impaired." The Laguna de Santa Rosa within Cotati city boundaries is listed as an impaired water body for dissolved oxygen, indicator bacteria, sedimentation, and temperature (State Water Resources Control Board [SWRCB] 2024). In addition to those contaminants, the Russian River, which regional waterways flow toward, is listed as impaired for aluminum, phosphorus, and manganese (SWRCB 2024).

Figure 4.8-2 Groundwater Basins



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Additional data provided by DWR, 2024.

22-13884 EPS
Fig 4.8-2 Groundwater Basins

Drinking Water Quality

As described under Section 4.8.1(c), *Water Supply*, Cotati sources its potable drinking water primarily from Russian River water through an agreement with Sonoma Water with additional water sourced from local groundwater wells. The quality of the City's and Sonoma Water's water deliveries is regulated by the SWRCB Division of Drinking Water, which requires regular collection and testing of water samples to ensure that the quality meets regulatory standards and does not exceed Maximum Contaminant Levels. Both Sonoma Water and Cotati perform water quality testing, which has consistently yielded results within acceptable regulatory limits (Sonoma Water 2021; City of Cotati 2022).

e. Flood Hazards

Flood hazards can occur when the amount of rainfall exceeds the infiltration capacity of the surrounding landscape or the conveyance capacity of the stormwater drainage system. Flood risk is defined as an annual percent chance of flooding, or the probability that flooding would occur in any given year. Although a 100-year flood will, on average, occur once every 100 years, the probability of a 100-year flood is one percent for any particular year. Two 100-year floods could occur in the same year or even in the same month, but the likelihood that two 100-year flood events would occur consecutively is very small.

Flooding is a common hazard in Cotati and occurs during heavy rains. Flooding is generally limited to streets and rights-of-way because the design criteria for the City's stormwater system allows stormwater to be carried in the streets under certain higher frequency flood events. Areas subject to flood risk are identified by the Federal Emergency Management Agency (FEMA) on the National Flood Hazard Layer. As shown in Figure 4.8-3, flood hazard areas are mainly located in the central portion of the city, west and further east from the project area. A 500-year flood plain (0.2 percent annual chance flood hazard) is located within Assessor's Parcel No. 144-320-012 in the eastern portion of the project area (FEMA 2008).

The City of Cotati and the project area are not within a dam inundation area (City of Cotati 2013). Additionally, because the Pacific Ocean is approximately 18 miles west of the city, the city and the project area are not in a tsunami hazard zone. There are no large bodies of water within or in the vicinity of the city that would be at risk of seiche.

4.8.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The Federal Water Pollution Prevention and Control Act of 1948 was the first major law to address water pollution in the United States. In 1972, the Federal Water Pollution Control Act was amended and became known as the Clean Water Act. The Clean Water Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the USEPA the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the USEPA and United States Army Corps of Engineers (USACE).

Figure 4.8-3 Floodplains in the Plan Area



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Additional data provided by FEMA, 2024.

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Fig 4.8-3 Flood Area

The federal Clean Water Act places the primary responsibility for the control of water pollution and for the planning of development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs. At the state and regional levels in California, the Clean Water Act is enforced by the SWRCB and the nine RWQCBs.

Section 401: Water Quality Certification

Section 401 of the Clean Water Act regulates discharges of fill and dredged material to waters of the United States. Under Section 401, the SWRCB and RWQCBs have regulatory authority over actions in waters of the United States through the issuance of water quality certifications, which are issued in conjunction with any federal permit (e.g., permits issued by the USACE under Section 404 of the Clean Water Act, described below). Section 401 provides the SWRCB and the RWQCBs with the regulatory authority to waive, certify, or deny any proposed activity that could result in a discharge to surface waters of the State. To waive or certify an activity, these agencies must find the proposed discharge would comply with State water quality standards, including those protecting beneficial uses and water quality. If these agencies deny the proposed activity, the federal permit cannot be issued.

Section 402: National Pollutant Elimination System (NPDES)

Section 402 of the Clean Water Act establishes the NPDES regulations for stormwater and other pollutant discharges. Section 402 prohibits discharge of pollutants to waters of the United States unless they are regulated by an NPDES permit. Stormwater discharges are regulated under a variety of NPDES permits, including municipal, agricultural, industrial, construction, and low-threat discharge permits.

In 1987, Congress amended the Clean Water Act to require the implementation of a two-phased program to address stormwater discharges. Phase I of the NPDES program, promulgated by the USEPA in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4s)¹ serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and 10 categories of industrial activities.

The USEPA recognized that smaller construction projects (disturbing less than five acres) and small MS4s (serving populations smaller than 100,000) were also contributing substantially to pollutant discharges nationwide. Therefore, in order to further improve stormwater quality, the USEPA promulgated the NPDES Phase II program in January 2000, which requires NPDES permits for stormwater discharges from regulated small MS4s and for construction sites disturbing between one and five acres of land. Provision E.12 of the NPDES MS4 permit addresses post-construction stormwater requirements for new development and redevelopment projects that add and/or replace 5,000 square feet or more of impervious area, including 1) incorporate site design, source control, and stormwater treatment measures into the project design; 2) minimize the discharge of pollutants in stormwater runoff and non-stormwater discharge; and 3) minimize increases in runoff flows as compared to pre-development conditions. In addition, Low Impact Development (LID) requirements apply. Projects that create and/or replace between 2,500 and 5,000 square feet of impervious surface must implement certain site design measures, including stream setbacks and buffers, soil quality improvement and maintenance, tree planting and preservation, rooftop and

¹ An MS4 is a conveyance or system of conveyances designed or used to collect or convey stormwater (e.g., storm drains, pipes, ditches) that are owned by a state, city, town, or other public entity.

impervious area disconnection, porous pavement, green roofs, vegetated swales, and rain barrels and cisterns.

In California, the NPDES program is administered by SWRCB through the nine RWQCBs. Further discussion of the NPDES program and permits in California relevant to the project are provided in discussion of state and local regulations, below. The City of Cotati is a permittee under the WDRs for the MS4 issued by the NCRWQCB (Order No. R1-2015-0030), which also serves as a NPDES permit under the Federal Clean Water Act (NPDES No. CA0025054) and addresses the WDRs under State law.

Section 404: Discharge of Dredge or Fill

Section 404 of the Clean Water Act requires a permit be issued by USACE before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulations (e.g. farming activities, maintenance activities, construction of temporary sedimentation basins, construction and maintenance of forest roads or temporary mining roads). Waters of the United States generally include tidal waters, lakes, ponds, rivers, streams (including intermittent streams), and wetlands (with the exception of isolated wetlands).

Section 303(d): Impaired Waters and Total Maximum Daily Loads (TMDL)

Section 303(d) of the Clean Water Act requires states to identify water bodies that do not meet water quality objectives and are not supporting beneficial uses. Each state must submit an updated biennial list, called the 303(d) list, to the USEPA. In addition to identifying the water bodies that are not supporting beneficial uses, the list also identifies the pollutant or stressor causing the impairment. Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each pollutant causing an impairment. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a “factor of safety” included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body.

National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 were enacted by Congress to reduce the costs of disaster relief. The intent of these acts was to reduce the need for large, publicly-funded flood control structures and disaster relief efforts by restricting development in floodplains. FEMA administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in a floodplain. FEMA issues Flood Insurance Rate Maps of communities participating in the National Flood Insurance Program. These maps delineate flood hazard zones in the community. Local agencies are responsible for administering their community’s floodplain management regulations. The City of Cotati Public Works and Engineering Department manages local storm drain facilities and is responsible for regional flood control planning within the City.

b. State Regulations

Porter-Cologne Water Quality Control Act

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of the Clean Water Act in California. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, regulate discharges to surface water and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product. Each RWQCB must adopt and implement a Water Quality Control Plan (Basin Plan) for its region in conformance with the policies set forth in the Porter-Cologne Act. The City of Cotati, including the project area, is within the jurisdictional boundaries of the NCRWQCB (Region 1).

California Toxics Rule

In May 2000, the USEPA promulgated the California Toxics Rule, which established numeric water quality criteria for toxic pollutants for waters in California. The California Toxics Rule provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated for human health or aquatic life uses. The California Toxics Rule is often used by the RWQCBs when establishing water quality objectives and TMDLs. Although the California Toxics Rule criteria do not apply directly to discharges of stormwater runoff, they are utilized as benchmarks for toxics in urban runoff and to evaluate the potential ecological impacts of stormwater runoff to receiving waters.

Antidegradation Policy

The State Antidegradation Policy (Resolution No. 68-16) was adopted by SWRCB in 1968 to protect surface water and groundwater from degradation. The Antidegradation Policy applies to the disposal of waste to high-quality surface water and groundwater. The Antidegradation Policy requires the water quality of these water bodies be maintained unless SWRCB finds the change will be consistent with maximum benefit to the people of the state, will not unreasonably affect present and anticipated beneficial uses of the waters, and will not result in water quality less than that prescribed in policies regulating water quality. The Antidegradation Policy also requires the best practicable treatment or control of discharges to high-quality waters to assure pollution or nuisance will not occur and the highest possible water quality will be maintained.

Construction Stormwater General Permit

The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), adopted by SWRCB, regulates construction activities that include clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction Stormwater General Permit authorizes the discharge of stormwater to surface waters from construction activities and requires all developers of land where construction activities will occur over more than one acre to do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction Stormwater General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a SWPPP that specifies construction best management practices (BMP) that will reduce pollution in stormwater discharges to the Best Available Technology/Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction Stormwater General Permit, a project applicant must electronically file all permit registration documents with SWRCB prior to the start of construction. Permit registration documents must include a Notice of Intent, Risk Assessment, site map, SWPPP, annual fee, and signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, control discharges from groundwater dewatering, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

The Construction Stormwater General Permit also contains post-construction requirements for projects not covered under a Phase I or Phase II MS4 Permit. The Construction Stormwater General Permit requires implementation of operational BMPs and low impact development features to reduce runoff and pollutants in stormwater discharge.

The Construction Stormwater General Permit also includes groundwater dewatering requirements for projects not covered under a De Minimis or Low Threat Discharge Permit. The dewatering requirements mandate dischargers to implement BMPs to control the volume and velocity of dewatering discharges. The Construction Stormwater General Permit also requires testing and treatment, if necessary, of groundwater discharge to verify the discharge meets or exceeds the effluent limitations specified in the permit.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) of 2014 is a comprehensive three-bill package that Governor Jerry Brown signed into California state law in September 2014. The SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention if necessary to protect the resource. The plan is intended to achieve a reliable groundwater supply for California for years to come. SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts of groundwater basins. SGMA requires the formation of local GSAs that are required to adopt GSPs to manage the sustainability of the groundwater basins.

The Santa Rosa Plain Subbasin is a medium priority basin. As a result, in 2017, the City and other eligible water suppliers in the groundwater basin joined together to form the Santa Rosa Plain Groundwater Sustainability Agency (GSA) and develop a groundwater sustainability plan. The Santa Rosa Plain GSA is further described under Section 4.8.2(c), *Local Regulations*, below.

c. Local Regulations

North Coast Regional Water Quality Control Board

The NCRWQCB Order No. R1-2015-0030 Sets forth discharge requirements for discharges from municipal storm sewer systems and addresses discharges of stormwater and non-stormwater from an MS4 in an urbanized area that may convey pollutants to receiving waters, including waters of the State and waters of the U.S. This order also serves as an NPDES permit under the federal Clean Water Act (NPDES No. CA0025054).

Sonoma County Water Agency

All of Sonoma County, including Cotati and the project area, are provided water from Sonoma County Water Agency (Sonoma Water), which is responsible for managing streams and flooding problems in the County. Sonoma Water published its Flood Management Design Manual (2020), which provides flood management guidelines and design guidelines for conveyance systems.

Santa Rosa Plain Groundwater Sustainability Agency (GSA)

The Santa Rosa Plain GSA is a joint powers authority formed in 2017 by the County of Sonoma; Sonoma Water; the cities of Cotati, Rohnert Park, Santa Rosa, Sebastopol; the Town of Windsor; and the Gold Ridge and Sonoma Resource Conservation Districts. The purpose of this organization is to support compliance with the SGMA in the Santa Rosa Plain Subbasin.

In 2019, the Santa Rosa Plain GSA adopted a consumption-based groundwater pumping fee and established a sustainable funding source for its long-term operation. In 2022, in accordance with SGMA, the Santa Rosa Plain GSA adopted its Groundwater Sustainability Plan (GSP), which was approved by DWR in early 2023. The GSP evaluates the historic and current condition of the groundwater basin and establishes a standard for sustainability of groundwater management and use. The GSP concludes that currently the basin is generally in balance, with recharge and extractions roughly matching. The GSP evaluates basin performance over a range of future climate scenarios and outlines management criteria and actions to ensure long-term sustainable performance by 2042.

While SGMA provides all groundwater sustainability agencies with a number of regulatory powers, the Santa Rosa Plain GSA is currently exercising only its authority to register wells and collect fees. Some Santa Rosa Plain GSA member agencies, including the City of Cotati, have local groundwater management regulations which support implementation of the GSP.

Storm Water Low Impact Development Technical Design Manual

The City of Cotati, as well as the cities of Cloverdale, Healdsburg, Rohnert Park, Santa Rosa, Sebastopol, and Ukiah, the Town of Windsor, Sonoma County and Sonoma Water, are responsible for implementation of NPDES permit requirements, including the Storm Water LID Technical Design Manual (LID Manual). The LID Manual was adopted by all responsible agencies and applies to new development, redevelopment, and applicable infrastructure improvement projects within each jurisdiction that create or replace 10,000 square feet or more of impervious surfaces. The LID Manual establishes BMPs for project operation which are permanent, small-scale features intended to mimic the hydrologic function of the site prior to development or redevelopment. BMPs include but are not limited to bioretention, vegetated swales, or rainwater collection measures.

City of Cotati General Plan

The Conservation Element of the Cotati General Plan (City of Cotati 2015) contains goals and policies related to erosion, stormwater, and flooding, including:

Goal SA 2: Reduce risks to human life and property from seismic and geologic hazards

Objective SA 2A: Regulate development in areas of seismic and geologic hazards to reduce risks associated with earthquakes, liquefaction, erosion, landslides, and expansive soils

Policy SA 2.10: An erosion and sediment control plan prepared by a civil engineer or other professional who is qualified to prepare such a plan, shall be submitted as part of a grading permit application. The erosion and sediment control plan shall delineate measures to appropriately and effectively minimize soil erosion and sedimentation, and shall comply with the design standards and construction site control measures contained in Chapter 14.36 of the Municipal Code.

Goal SA 3: Reduce risks to human life, property, and public services associated with flooding

Objective SA 3A: Protect Cotati's citizens and businesses from flooding

Policy SA 3.1: Support and participate in planning efforts undertaken at the regional, state, and federal levels to improve flood management facilities throughout Sonoma County.

Policy SA 3.2: Require all development projects to demonstrate how storm water runoff will be detained or retained on-site and/or conveyed to the nearest drainage facility as part of the development review process. Project applicants shall demonstrate that project implementation would comply with all applicable provisions of the City's MS4 permit, which defines the design storm event for water detention and retention features.

Policy SA 3.3: Ensure that construction activities will not result in adverse impacts to existing flood control and drainage structures.

Policy SA 3.4: For properties located within a flood hazard zone, as identified on the most recent FEMA 100-year floodplain map or identified by the California Department of Water Resources, the City shall not enter into a development agreement, approve any discretionary entitlement, tentative parcel map, parcel map, final map, or any ministerial permit that would result in the construction of a new residence unless flood protection findings consistent with the requirements of California Government Code Sections 65865.5, 65962, and 66474.5 can be made and documented.

Policy SA 3.5: All new development within the 100-year flood plain shall be built according to Federal Flood Insurance Agency standards.

Policy SA 3.6: Require new structures to be located outside of the 100-year floodplain to the greatest extent feasible.

Policy SA 3.7: Monitor ongoing efforts by FEMA and the California Department of Water Resources to update flood hazard maps within the City of Cotati and Sonoma County.

Policy SA 3.9: Encourage flood control measures that respect natural drainage features, vegetation and natural waterways, while still providing for adequate flood control and protection.

Policy SA 3.10: Continue efforts to eliminate flooding, by upgrading and expanding the storm drainage system. Policy SA 3.11: Ensure that new development or governmental action does not compound the potential for flooding.

Policy SA 3.12: Require all new developments in the city to be designed to minimize vegetation removal, soil compaction, and site coverage.

Policy SA 3.13: Ensure that adequate drainage and erosion controls are provided during construction of all new developments.

Cotati Municipal Code

Cotati Municipal Code Chapter 13.03, *Water System Rules and Requirements*, outlines the provisions of the City's water supply system and prohibits the construction of private wells within the city limits, facilitating the City's ability to manage groundwater pumping.

Chapter 13.68 of Cotati Municipal Code outlines the City's stormwater ordinance and ensures water quality is protected in accordance with the federal CWA and NPDES stormwater regulations. Chapter 13.68 prohibits the release of non-stormwater into the City's stormwater system, requires the remediation of discharged pollutants, and requires immediate actions following accidental spills.

Cotati Municipal Code Chapter 15.04, *Floodplain Management*, provides regulations to ensure flood inundation does not result in loss of life or property. This chapter provides construction standards in flood hazard zones for structures, utilities, buildings, and recreational vehicles.

Cotati Municipal Code Chapter 14.36, *Erosion and Sediment Control*, regulates grading on public and private property to control erosion and sedimentation to protect water quality. Chapter 14.36 requires preparation of erosion and sediment control plans, which must include specific design standards to ensure minimal release of sediment.

4.8.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines* a project may be deemed to have a significant impact on hydrology and water quality if it would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - a. Result in substantial erosion or siltation on- or off-site,
 - b. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site,
 - c. 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
 - d. Impede or redirect flood flows;

4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and/or
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Methodology

This section describes the potential environmental impacts of the proposed project relevant to hydrology and water quality. The impact analysis is based on an assessment of baseline conditions for the project area, including climate, topography, watersheds and surface waters, groundwater, and floodplains, as described above under Section 4.8.1, *Setting*. This analysis identifies potential impacts based on the predicated interaction between the affected environment and construction, operation, and maintenance activities related to the development that would occur under the proposed project, and recommends mitigation measures, when necessary, to avoid or minimize impacts.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HYD-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT VIOLATE WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS, OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUNDWATER QUALITY. INDIVIDUAL DEVELOPMENT PROJECTS ARE REQUIRED TO COMPLY WITH STATE AND LOCAL WATER QUALITY REGULATIONS AND PERMIT REQUIREMENTS FOR BOTH CONSTRUCTION AND OPERATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

As described in Section 2, *Project Description*, the proposed project would facilitate construction and operation of new development in the project area. Construction activities associated with development facilitated by the project could result in soil erosion during earth-moving activities, including excavation, grading, soil compaction and moving, and soil stockpiling, which could degrade surface water or groundwater quality. Each individual development facilitated by the project would be required to comply with State and local water quality regulations designed to control erosion and protect water quality during construction. This includes compliance with the requirements of SWRCB's NPDES Construction Stormwater General Permit, which requires preparation and implementation of a SWPPP for projects that disturb one acre or more of land. The SWPPP must include erosion and sediment control BMPs that would meet or exceed measures required by the NPDES Construction General Permit. BMPs may include measures such as the installation of silt fences to trap sediments, slope stabilization, and regular sweeping of construction sites to control dust. All development facilitated by the project, regardless of size, would be required to comply with stormwater control measures outlined in Cotati Municipal Code 14.36, which requires BMPs for construction and operation of projects to reduce the discharge of sediment and other particulate matter into the City's stormwater system. Post-construction stormwater performance standards are also required to specifically address water quality and channel protection events. Implementation of the required SWPPP would reduce the potential for eroded soil and any contaminants attached to that soil to contaminate a waterbody following a storm event. Construction of development facilitated by the project may require subsurface earthwork for foundations and utility lines, and

excavation could contact groundwater. Dewatering low volumes of uncontaminated groundwater is covered under the City's NPDES MS4 General Permit issued by the NCRWQCB (Order No. R1-2015-0030). The NPDES MS4 General Permit specifies BMPs to be implemented during dewatering activities, including but not limited to evaluation of groundwater for contamination, settling or filtering sediment and debris prior to release, and control of discharge flow rate to minimize erosion potential. Compliance with the BMPs under the NPDES MS4 General Permit would minimize contamination to groundwater during construction of development facilitated by the project to the extent feasible. If development facilitated by the project requires dewatering of high volumes of groundwater, or dewatering of contaminated groundwater, separate coverage may be required and the City would coordinate with the NCRWQCB.

With adherence to the provisions of the NPDES Construction Stormwater General Permit, the NPDES MS4 General Permit, and Cotati Municipal Code, construction impacts to surface and groundwater quality would be less than significant.

Operation

The City of Cotati is a permittee under the WDRs for the NPDES MS4 General Permit issued by the NCRWQCB (Order No. R1-2015-0030), which also serves as a NPDES permit under the Federal Clean Water Act (NPDES No. CA0025054) and addresses the WDRs under State law. As discussed in Section 4.8.2, *Regulatory Setting*, the NPDES MS4 General Permit addresses post-construction stormwater requirements for new development and redevelopment projects that add and/or replace 5,000 square feet or more of impervious area. Because development facilitated by the project would be limited to the existing parcels and existing development in the project area, and all project parcels are substantially over 5,000 square feet in size, the NPDES MS4 General Permit would apply to future projects. Specific project development would be required to adhere to all requirements under the NPDES MS4 General Permit as well as the requirements of Cotati Municipal Code Chapter 14.36, *Erosion and Sediment Control*. This includes maintaining stormwater detention and treatment measures that are consistent with low impact design (LID) principles and limit the amount of impermeable surface and include integrated management practices that help infiltrate, store, or evaporate stormwater during and immediately after storm events.

Together, these requirements help ensure that the volume of stormwater runoff does not substantially increase as a result of development, that stormwater is able to recharge groundwater aquifers, and that stormwater is treated in order to minimize the discharge of pollutants into either groundwater or surface water.

Compliance with federal, State, and local regulations, permit requirements, Cotati General Plan policies, and BMPs, as detailed herein, would prevent or minimize impacts related to water quality and ensure that operation of all future development under the proposed project would not cause or contribute to the degradation of water quality in receiving waters. Therefore, operation of specific developments facilitated by the proposed project would not violate any water quality standards or WDRs or otherwise substantially degrade water quality, and water quality impacts would be less than significant.

Mitigation Measure

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact HYD-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT SUSTAINABLE GROUNDWATER MANAGEMENT OF THE BASIN WOULD BE IMPEDED. FUTURE DEVELOPMENT WOULD ADHERE TO CITY POLICIES AND REGULATIONS AND COMPLY WITH NPDES REQUIREMENTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would increase the demand for water in the project area. As discussed in Section 4.8.1, approximately 75 percent of Cotati's water supply is from Sonoma Water, which obtains water supplies from surface waters, and 25 percent is from groundwater. The project would result in a water demand of 205 acre-feet per year (AFY), of which a portion of the demand would be met through groundwater extraction (Appendix C). It is assumed that the percentage of groundwater demand would match that of the rest of the City; therefore, the project would result in approximately 51 AFY of increased groundwater demand. As described in the Water Supply Assessment (Appendix C), the actual water demand in the City of Cotati in 2023 was approximately 297 AFY less than it was projected to be; therefore, the project's demand of 205 AFY would not exceed the difference between projected water demand and actual water demand. Sufficient water supply is available to serve the proposed project, including groundwater, and the project would not result in a substantial decrease in groundwater supplies.

Construction of development facilitated by the project may require subsurface earthwork for foundations and utility lines, and excavation could contact groundwater. As discussed under Impact HYD-1, dewatering low volumes of uncontaminated groundwater is covered under the City's NPDES MS4 General Permit issued by the NCRWQCB (Order No. R1-2015-0030). The displaced volume would not be substantial relative to the storage volume of the underlying groundwater basins. Additionally, utility infrastructure and foundations would not extend to depths of groundwater aquifers and storage. If required, dewatering activities required for construction could also remove groundwater, but the volume of water removed would not be substantial relative to groundwater pumping for water supply. If development facilitated by the project requires dewatering of high volumes of groundwater, or dewatering of contaminated groundwater, separate coverage may be required and the City would coordinate with the NCRWQCB. Dewatering would be temporary, and groundwater levels would recover following construction. Water used during construction for cleaning, dust control, and other uses would be nominal, and could be either trucked in from off-site water sources or provided via existing city water mains. Thus, construction activities would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

The project would increase the amount of impervious surface area in the project area by an estimated 715,000 square feet, assuming that parcels are fully developed with impervious surfaces. However, development facilitated by the project would be required to comply with the City's LID Manual, which requires the implementation of permanent stormwater BMPs for projects that

create or replace 10,000 square feet or more of impervious surfaces. Required BMPs would encourage groundwater recharge through the construction of stormwater capture basins, which would percolate captured surface water into the soil on site. Compliance with these existing requirements would ensure that impacts to groundwater supplies would be less than significant.

The project would not interfere substantially with groundwater recharge. Therefore, groundwater impacts would be less than significant.

Mitigation Measure

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3a:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?
Threshold 3c:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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?

Impact HYD-3 DEVELOPMENT FACILITATED BY THE PROJECT MAY ALTER DRAINAGE PATTERNS ON INDIVIDUAL PARCELS AND INCREMENTALLY INCREASE OVERALL RUNOFF VOLUMES IN THE PROJECT AREA, BUT WOULD NOT RESULT IN SUBSTANTIAL EROSION OR SILTATION, RESULT IN INCREASED FLOODING, EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS, OR RESULT IN SUBSTANTIAL ADDITIONAL POLLUTED RUNOFF. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Construction activities would involve stockpiling, grading, excavation, dredging, paving, and other earth-disturbing activities that could result in the alteration of existing drainage patterns on parcels identified for development or redevelopment under the proposed project. None of the parcels identified for development or redevelopment contain a stream or river, and development facilitated by the project would not result in the alteration of the course of a stream or a river. However, development facilitated by the project could result in a net increase in impervious surfaces within parcels identified for development or redevelopment, which could result in on- or off-site erosion or siltation, or create or contribute additional runoff in existing stormwater drainage systems. As described under Impact HYD-1, development facilitated by the project would be required to comply with the NPDES Construction Stormwater General Permit, the NPDES MS4 General Permit, and Cotati Municipal Code, which would avoid and reduce erosion and siltation to the extent feasible. Compliance with these provisions would reduce impacts associated with on- or off-site erosion and siltation to a less than significant level.

The use of construction equipment would involve the transport, use, and disposal of hazardous materials such as fuel, solvents, and paints. Additionally, hazardous materials would be needed for

fueling and servicing construction equipment. As discussed further in Section 4.7, *Hazards and Hazardous Materials*, several federal and state regulations address the transportation, storage, and use of hazardous materials, including but not limited to the federal Toxic Substances Control Act, the federal Resource Conservation and Recovery Act, the state Hazardous Waste Control Law, and California Government Code Section 65962.5. Hazardous materials used and stored within parcels identified for development and redevelopment would also be used in accordance with manufacturer specifications. Chapter 10.50 of Cotati Municipal Code regulates vehicles transporting hazardous materials, and establishes procedures for the storage of transported hazardous materials. Compliance with applicable federal, state, and local regulations related to hazardous materials would reduce the potential for additional sources of polluted runoff and impacts would be less than significant.

Operation

Development facilitated by the project could alter the existing drainage patterns on individual project sites through the addition of impervious surfaces. Individual project designs would be reviewed by the City to ensure that grading plans and development configurations would not impinge upon protected creeks. Furthermore, development facilitated by the project would be subject to the City's General Plan provisions that reduce flooding hazards, require effective stormwater management, and address streambed alterations that could arise from project development as part of the permitting process for that project. In addition, LID requirements imposed through the City's NPDES MS4 General Permit and LID Manual, as well as landscaping and open space regulations, would add permeable surfaces and maintain drainage. Chapter 14.36 of the Cotati Municipal Code requires BMPs to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects as a requirement of the MS4 General Permit. This section also sets forth requirements and BMPs pertaining to the mitigation of erosion, sediment control, and runoff. The City incorporates such requirements in any land use entitlement and construction or building-related permit to be issued relative to such development or redevelopment. Lastly, the City's MS4 permit requires compliance with the LID Technical Design Manual which aims to specifically reduce the amount of surface runoff and aid in groundwater recharge through techniques such as infiltration, evapotranspiration, bioretention and/or rainfall harvest and additional uses.

Operation could entail the use or storage of hazardous materials within the project area. As discussed further in Section 4.7, *Hazards and Hazardous Materials*, several federal and state regulations address the storage and use of hazardous materials, including but not limited to the federal Toxic Substances Control Act, the federal Resource Conservation and Recovery Act, and the state Hazardous Waste Control Law. Hazardous materials used and stored within parcels identified for development and redevelopment would also be used in accordance with manufacturer specifications. Chapter 10.50 of Cotati Municipal Code establishes procedures for the storage of hazardous materials. Compliance with applicable federal, state, and local regulations related to hazardous materials would reduce the potential for additional sources of polluted runoff and impacts would be less than significant.

With adherence to federal and state regulations, the NPDES MS4 General Permit, and Cotati Municipal Code, development facilitated by the proposed project would not result in erosion or siltation on- or off-site; 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. Therefore, impacts would be less than significant.

Mitigation Measure

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3b: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site?

Threshold 3d: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Threshold 4: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impact HYD-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN THE ADDITION OF IMPERVIOUS SURFACES, WHICH COULD INCREASE RUNOFF AND RESULT IN FLOODING OR THE REDIRECTION OF FLOOD FLOWS. DEVELOPMENT COULD ALSO BE LOCATED WITHIN A FLOOD HAZARD ZONE. COMPLIANCE WITH THE NPDES MS4 GENERAL PERMIT AND COTATI MUNICIPAL CODE WOULD REDUCE IMPACTS TO LESS THAN SIGNIFICANT.

As described under Impact HYD-3, development facilitated by the project would not alter the course of a stream or a river; however, development could result in the net increase of impervious surfaces in parcels identified for development or redevelopment by an estimated 715,000 square feet, assuming that parcels are fully developed with impervious surfaces, which could result in an increase to the rate or amount of surface runoff and result in flooding on or off site. As discussed under Impact HYD-1, most individual development facilitated by the project would be relatively small and would be subject to the NPDES MS4 General Permit and the City's LID Manual. Development facilitated by the project would be reviewed by the City of Cotati and appropriate LID BMPs would be identified to retain each site's original hydrologic conditions to the extent feasible. Development facilitated by the project would also be required to comply with Chapter 13.68 of Cotati Municipal Code, which establishes the City's stormwater ordinance and includes provisions for eliminating sources of stormwater runoff. Therefore, the project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site and impacts would be less than significant.

As discussed in Section 4.8.1(e), *Flood Hazards*, of the parcels identified for development or redevelopment, Assessor's Parcel No. 144-320-012 is located within a 500-year floodplain. Development within this parcel would be required to comply with Cotati Municipal Code Chapter 15.04, which regulates development within designated flood hazard areas. Section 15.04.170 establishes standards of construction required for development in flood hazard areas, such as anchoring buildings to foundations and the use of flood-resistant materials. Compliance with Section 15.04.170 would reduce the potential risk for development in this parcel to release pollutants in flood waters. Section 15.04.220 of Cotati Municipal Code also prohibits development in flood hazard zones unless it is demonstrated that the proposed development will not increase the

base flood elevation by more than one foot at any point within the city. Accordingly, with compliance with Cotati Municipal Code, development facilitated by the project within this parcel would not result in increased off-site flooding. Compliance with provisions for flood hazard reduction established in Cotati Municipal Code would reduce impacts associated impeding or redirecting flood flows or the risk of pollutants due to inundation to the extent feasible and impacts would be less than significant.

The project area is not located in a tsunami or seiche hazard area, and the project would not risk release of pollutants due to inundation from a tsunami or seiche.

Mitigation Measure

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT INTERFERE SUBSTANTIALLY WITH A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN. FUTURE DEVELOPMENT WOULD ADHERE TO COTATI GENERAL PLAN GOALS AND POLICIES AND COMPLY WITH NPDES REQUIREMENTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed above under Section 4.8.1, the project area is located within the Santa Rosa Valley Basin and Santa Rosa Plain Subbasin. The Santa Rosa Plain GSA manages the Santa Rosa Valley Basin and Santa Rosa Plain Subbasin to protect and maintain the sustainability of the Basin. The Santa Rosa Plain GSA adopted a GSP in 2022, which was approved by DWR on January 26, 2023, per SGMA, which is a 20-year plan that establishes a standard for sustainability of groundwater management and provides a plan for managing groundwater. As discussed above under Impact HWQ-2, with adherence to Cotati Municipal Code and Cotati General Plan goals and policies, the proposed project would not include installation of new groundwater wells, substantially decrease groundwater supply, or interfere with groundwater recharge such that the project would impede sustainable groundwater management of the Basin. As noted under Impact HYD-2, the project would result in a water demand of 205 AFY (Appendix C). As described in the Water Supply Assessment (Appendix C), the actual water demand in the City of Cotati in 2023 was approximately 297 AFY less than it was projected to be; therefore, the project's demand of 205 AFY would not exceed the difference between projected water demand and actual water demand. Sufficient water supply is available to serve the proposed project, including groundwater, and the project would not conflict with sustainable groundwater management of the Basin.

Cotati is under the jurisdiction of the NCRWQCB, which is responsible for preparing the Water Quality Control Plan for the North Coast Region (Basin Plan). The Basin Plan designates beneficial uses of water in the region and establishes narrative and numerical water quality objectives. The Basin Plan serves as the basis for the NCRWQCB's regulatory programs and incorporates an implementation plan for achieving water quality objectives (NCRWQCB 2018). As discussed above under Impact HWQ-2, with adherence to Cotati Municipal Code and Cotati General Plan goals and policies, the proposed project would not substantially impact water quality such that the project would conflict with the Basin Plan.

Therefore, with adherence to State and local regulations, development under the proposed project would not interfere with the objectives and goals of the GSP or the Basin Plan. The project would not substantially decrease groundwater supply or interfere with groundwater recharge such that the project would impede sustainable groundwater management. Impacts would be less than significant.

Mitigation Measure

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.8.4 Cumulative Impacts

The geographic scope of the cumulative hydrology and water quality impacts is the surface drainage management areas and groundwater basins that contain the project area, including the Upper Laguna De Santa Rosa watershed (shown in Figure 4.8-1) and the Santa Rosa Plain Subbasin (shown in Figure 4.8-2). This geographic scope is appropriate because potential impacts associated with surface water and drainages would generally be confined to the stormwater drainage area and surface watershed in which a site is located. Similarly, potential impacts associated with groundwater would generally be confined to the groundwater basin in which a site is located. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Section 3, *Environmental Impact Analysis*) located in Cotati and surrounding areas in addition to the proposed plan.

Cumulative development would generally increase impermeable surface area in the applicable watersheds, which would potentially increase peak flood flows, alter drainage patterns, reduce groundwater recharge, and increase pollutants in the regional stormwater. Development facilitated by cumulative plans and projects would be required to adhere to all applicable State and local regulations designed to control erosion and protect water quality, including the applicable City or County Code, NPDES Construction General Permit, MS4 General Permits, and applicable General Plan policies. All construction sites larger than one acre in size would be required to prepare implement project-specific SWPPPs (as required by the Clean Water Act) with BMPs to minimize or avoid water quality degradation from construction and other ground-disturbing activities. All development facilitated by the project, regardless of size, would be required to comply with stormwater control measures outlined in Cotati Municipal Code 14.36, which requires BMPs for construction and operation of projects to reduce the discharge of sediment and other particulate matter into the City's stormwater system. Cumulative plans and projects would also be subject to requirements of the Clean Water Act and the policies of the applicable planning document. Cumulative impacts to hydrology and water quality would be less than significant.

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4.9 Land Use and Planning

This section summarizes the project area's land use characteristics, including the overall land use pattern as well as a more detailed analysis by major land use type, and analyzes the potential environmental effects of the proposed project related to land use and planning.

4.9.1 Setting

a. Current Land Use Pattern

The project area is located in the City of Cotati and is subject to City zoning and City General Plan land use designations. The project area primarily includes land use designations under the SWSP, General Commercial (GC), and High Density Residential (HDR), with zoning classifications of SW (Santero Way), CE (Commercial, East Cotati Corridor), NM (Neighborhood, Medium Density) and NL (Neighborhood, Low Density). The existing land use and zoning designations are provided in Table 2-1 and Table 2-2 in Section 2, *Project Description*, for the SWSP parcels and TOC parcels, respectively. Current land uses within the project are also provided in Figure 2-2 in Section 2, *Project Description*, and include commercial, residential, retail mixed-use, office mixed-use, self-storage, and parkland uses. The land use designations typically align with the zoning designation, such that residentially zoned lands are designated for residential land uses, and commercially zoned lands are designated for commercial land uses, for example.

4.9.1 Regulatory Setting

a. State Regulations

Planning and Zoning Law

State law requires each city and county in California to adopt a general plan for the physical development of the land within its planning area (Government Code Sections 65300-65404). The general plan must contain land use, housing, circulation, open space, conservation, noise, and safety elements, as well as any other elements that the city or county may wish to adopt. The circulation element of a local general plan must be correlated with the land use element.

Zoning authority originates from city and county police power and from the State's Planning and Zoning Law, which sets minimum requirements for local zoning ordinances. The city or county zoning code is the set of detailed requirements that implement the general plan policies at the level of the individual parcel. The zoning code presents standards for different uses and identifies which uses are allowed in the various zoning districts of the jurisdiction. Since 1971, State law has required the city or county zoning code to be consistent with the jurisdiction's general plan.

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act (SB 375) supports the State's climate goals by helping reduce greenhouse gas emissions through coordinated transportation, housing, and land use planning. Under the Act, the California Air Resources Board (CARB) set targets for 2035 for each of the 18 metropolitan planning organization regions in 2010 and updated them in 2018. Each of the regions must prepare a SCS, as an integral part of its regional transportation plan, that contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet

CARB's targets. The Act establishes some incentives to encourage implementation of the development patterns and strategies included in an SCS. Developers can get relief from certain environmental review requirements under the CEQA if their new residential and mixed-use projects are consistent with a regions SCS that meets the targets (see Public Resources Code Sections 21155, 21155.1, 21155.2, 21159.28.).

b. Regional Regulations

Association of Bay Area Governments and the Metropolitan Transportation Commission Plan Bay Area 2050

The Association of Bay Area Governments and the Metropolitan Transportation Commission (ABAG/MTC) Plan Bay Area 2050, adopted in October 2021, integrated transportation and land-use plan for the nine-county San Francisco Bay Area, including Sonoma County. Plan Bay Area 2050 meets all state and federal requirements for a Regional Transportation Plan and Sustainable Communities Strategy, also referred to as the RTP/SCS. The Plan describes where and how the region can accommodate the slightly fewer than 1.4 million new households and 1.4 million new jobs projected in the Bay Area by 2050 and details the regional transportation investment strategy over this period. The Plan identifies 35 strategies focused on improving housing, the economy, transportation, and the environment across the Bay Area over a 30-year period. The plan has identified four geographic areas to guide where future growth in housing and jobs would be focused over the next 30 years: Priority Development Areas (PDA), Priority Production Areas (PPA), Transit-Rich Areas (TRA), and High-Resource Areas (HRA). ABAG and MTC developed land use and transportation scenarios in Plan Bay Area 2050 that distributes the total amount of anticipated growth across the region and measure how well each scenario measures against the Plan goals. Based upon performance, the preferred scenario provides a regional pattern of household and employment growth and a corresponding transportation investment strategy (ABAG 2021).

c. Local Regulations

Cotati General Plan

The City's current General Plan was adopted in March 2015 and guides how land in the City may be developed and used by designating each parcel of land for a particular use or combination of uses and by establishing broad development policies. Land use designations identify both the types of development, such as residential, commercial, and industrial, that are permitted and the density or intensity of allowed development, such as the minimum or maximum density of housing units permitted on an acre of land, or the amount of building square footage allowed. The following goals, objectives, and policies in the General Plan Land Use Element would be applicable to the proposed 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

Objective LU 1A: Provide a Balanced Mix of Land Uses that Reflect the Needs of City Residents and Businesses

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

Policy LU 1.4: Require new development to occur in a logical and orderly manner, focusing growth on infill locations and areas designated for urbanization on the Land Use Map (see Figure 7.1), and be subject to the ability to provide urban services, including paying for any needed extension of services.

Objective LU 1C: Encourage and, when Possible, Prioritize Development of Infill and Underutilized Sites within Mostly Developed Areas, in Order to Minimize the Premature Extension of Infrastructure

Policy LU 1.5: Use sustainable, best management practices in green building, stormwater management, and conservation to mitigate infrastructure impacts, while minimizing effects on water, sewer, and energy resources.

Goal LU 2: Enhance the Quality of Life of Cotati Residents Through the Creation and Maintenance of Well-Designed and Appropriately Served Neighborhoods

Objective LU 2A: Establish and Maintain Residential Neighborhoods as Safe and Attractive Places to Live with Convenient Access to Commercial Services, Recreational Facilities, Employment Opportunities, Public Services, and Other Destinations

Policy LU 2.1: Development at the interface of residential land use designations with other designations shall be designed to ensure compatibility between the uses and to reduce any potential negative impacts associated with aesthetics, noise, and safety.

Policy LU 2.3: Locate residences away from areas of excessive noise, smoke, or dust, and ensure that adequate provisions, including a buffer or transitional uses, are made to ensure the health and well-being of existing and future residents.

Policy LU 2.4: Maintain the character of existing neighborhoods by ensuring new development is compatible in style, size, color, and footprint with the existing residences in the neighborhood.

Policy LU 2.5: Locate medium and higher density housing within easy walking or bicycling distance of public facilities, services, transit, and major employers.

Policy LU 2.6: Require new residential development to be consistent with the small-town character of Cotati and designed and landscaped in an aesthetically pleasing and sustainable manner.

Policy LU 2.9: Encourage a concentration of neighborhood, community, and retail amenities and services within walking distance of residential areas.

Policy LU 2.10: Encourage mixed-use, pedestrian-, and transit-oriented development, with a focus on the Hub and major corridors, and continue to prioritize implementation of the Downtown Specific Plan in order to provide a range of housing opportunities and expand the range of goods and services available to nearby residents.

Objective LU 2B: Encourage an Appropriate Mix of Land Uses in Residential and Commercial Areas

Policy LU 2.11: Continue to mix residential and commercial uses in appropriate areas, with an emphasis on providing mixed uses in the areas with Specific Plan land use designations.

Goal LU 3: Provide for a Range of Commercial, Industrial, and Mixed Uses to Provide Cotati's Residents Access to Jobs and Employment and to Support the Local Economy

Objective LU 3A: Ensure that Commercial and Industrial Contributes to the Economic Vitality of the City while Also Enhancing the City's Small-Town Character and Quality of Life

Policy LU 3.1: Encourage a vibrant mixture of retail, service, and office uses in the downtown area and along East Cotati Avenue.

Policy LU 3.2: Encourage infill development of vacant lots within existing commercial districts and the core downtown/business areas and prioritize such development.

Policy LU 3.5: In the Specific Plan designations for the Santero Way and downtown areas, encourage residential and office uses in upper-story locations or locations along the periphery of the retail area in order to facilitate active and pedestrian-oriented commercial areas.

Santero Way Specific Plan

The Santero Way Specific Plan (SWSP) was adopted in 2000 and was aimed to encourage investment and development along Santero Way through specific established public policies, a land use plan, design standards and guidelines, and implementation steps. A particular goal of the SWSP was to allow for a mix of uses resulting in a vital neighborhood. The SWSP was also planned to support all modes of transportation in order to reduce passenger vehicles. The following objectives from the SWSP would be applicable to the proposed project:

Objective LU-1: Create a vibrant mixed-use neighborhood that is compatible with and complements the existing small town character of the City of Cotati.

Objective LU-4: Reduce visual and other impacts to adjacent residential uses through land use designations, landscape buffering, height limits, and other appropriate methods.

Objective LU-5: Cluster the more intensive uses at the north end of the site, near existing and future transit service and access to East Cotati Avenue.

Objective LU-6: Locate uses that will be less sensitive to noise and vibration closer to the Northwestern Pacific railroad r.o.w.

Objective UPS-4: Create a land use pattern, circulation system, and urban design form that provides for enhanced public safety by traditional means (e.g. – fire hydrants, access standards, building codes, etc.) as well as through defensible design (e.g. – uses that result in activity throughout the day and “eyes on the street”).

Cotati Municipal Code

The Cotati Municipal Code (Chapter 17.20) includes 21 zoning districts. Each zoning district has developed standards that are designed to protect and promote the health, safety, and general welfare of the community and to implement the policies of the General Plan. The zoning districts only apply to land within the City limits and the standards serve to preserve the character and

integrity of existing neighborhoods. Within a typical district there are regulations related to land use, lot size, coverage, building heights, parking, and landscaping.

The four zoning districts established by the Cotati Zoning Ordinance within the project area include:

- **NL – Neighborhood, Low Density (6 dwelling units per acre).** This district allows for neighborhoods with detached and attached single-family homes, duplexes, and limited neighborhood retail uses. It regulates non-residential land use intensity according to specific site planning and building standards. This zoning aligns with the low-medium density designation in the General Plan.
- **NM – Neighborhood, Medium Density (10 dwelling units per acre).** This district allows for a variety of housing types, such as small-lot single-family homes, duplexes, townhouses, and apartments, along with limited neighborhood retail uses. Non-residential use intensity is regulated by zoning standards. This district is consistent with the medium density residential designation of the General Plan.
- **CE – Commercial, East Cotati Avenue Corridor (15 dwelling units per acre).** This district allows for a variety of retail, service, and residential uses. It supports local businesses like offices, shops, and small restaurants, typically in two-story structures. Non-residential development intensity is regulated by zoning standards, and the CE district aligns with the office and general commercial land use designations of the General Plan.
- **SPSW – Specific Plan, Santero Way.** This district contains a mix of retail, office, cottage business, live/work, residential and self-storage overlay. General retail stores, personal and business services, travel, insurance, and other agencies, small grocery stores, restaurants or cafes, and day care centers are permitted uses in the retail uses. Professional offices, medical/dental offices, business offices, travel, insurance, and other agencies, music/dance studios, and health club/recreation facilities are permitted uses in the office use. The cottage business use is designed for small businesses. Residential uses and associated commercial, artistic, or industrial use are permitted uses in live/work uses. Attached rental apartments or condominiums, townhomes, duplexes, single-family detached homes, home occupations, and accessory parking lots are permitted uses in the residential uses. Within the self-storage overlay uses, self-storage is a permitted conditional use.

4.9.2 Impact Analysis

a. Significance Thresholds and Methodology

Based on Appendix G of the *CEQA Guidelines* a project may be deemed to have a significant impact on land use and planning if it would:

1. Physically divide an established community; and/or
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The plan consistency analysis describes existing regional and local plans and policies and is intended to fulfill the requirements of *CEQA Guidelines* Section 15125(d). The emphasis of the analysis is on plan inconsistency and potential conflicts between the project and existing applicable land use plans, and whether any inconsistencies are significant environmental effects. The project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the applicable plans and does not conflict with any directly applicable policies. A

given project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation. Courts have also acknowledged that general and specific plans attempt to balance a range of competing interests, and that it is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan. Additionally, in reaching such consistency conclusions, the County may also consider the consequences of denial of a project, which can also result in other policy inconsistencies. For example, Government Code Section 65589.5 explains that the potential consequences of limiting the approval of housing are reduced mobility, urban sprawl, excessive commuting, and air quality deterioration.

For an impact to be considered significant, any inconsistency would also have to result in a significant adverse change in the environment not already addressed in the other resource chapters of this EIR. The analysis below provides a brief overview of the most relevant policies from the various planning documents. However, the City's consistency conclusions are based upon the planning documents as a whole.

a. Project Impacts and Mitigation Measures

Threshold 1: Would the project physically divide an established community?

Impact LU-1 THE PROPOSED PROJECT WOULD PROMOTE INFILL DEVELOPMENT IN THE PROJECT AREA AND WOULD NOT FACILITATE DEVELOPMENT THAT WOULD PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Most of the land in the project area is either currently vacant or developed with primarily residential and commercial land uses. Under buildout of the proposed project, an estimated 769 new housing units would be added to the City of Cotati. This additional housing would lead to an increase of approximately 1,800 residents in the city. The proposed project would result in approximately 651,365 square feet of commercial land uses.

The City of Cotati is surrounded by scenic open spaces and has a neighborhood-focused design with access to nature. The proposed project is focused around the Cotati SMART Station, with a focus on transit-oriented development, and encourages compact, walkable, and mixed-use development. The project would enhance connectivity within the existing developed area of eastern Cotati. The project also involves rezoning and changing land use designations of certain parcels to align with the goals of a neighborhood-serving development. The project would enable the project area to be more connected through transit-oriented development and increased mixed-use development in the project area.

Additionally, the existing SWSP contains planning objectives such as Objectives LU-5 and C-1, which encourage the creation of a vibrant mixed-use neighborhood that is compatible with and complementary to the existing character of the City, and to provide a network of transportation infrastructure that allows for all modes of transportation with a focus on supporting pedestrian activity throughout the SWSP area. The planning objectives in the existing SWSP would maintain existing communities and aim to increase connectivity through mixed-used developments and transportation access. The proposed project would modify development standards, including residential density, building heights, and allowed uses, while expanding the SWSP area to include three additional parcels near the SMART rail line, along with updating infrastructure evaluations and parking requirements. By allowing for higher residential density, the project encourages more compact development and promotes walking or cycling within the neighborhood. Mixed-use

developments and updated infrastructure, especially around transit hubs like the SMART station, further enhance connectivity by encouraging residents to use public transit and access nearby amenities without relying on cars. Expanding the SWSP area to include additional parcels and updating infrastructure like parking requirements could improve connectivity by ensuring that developments are better integrated into the surrounding community.

Overall, the proposed project would increase connectivity in the project area through mixed-use development and transit-oriented development. New residential units facilitated by the proposed project would not physically divide an existing community, such as new major roads or other facilities. The proposed project would not involve the construction of new major roads or infrastructure, such as highways or large-scale physical barriers, that could separate, or fragment established neighborhoods. Instead, the project aims to increase connectivity within the community by supporting transit-oriented, mixed-use development near the Cotati SMART Station. This would enhance accessibility without creating new physical barriers, ensuring that the development integrates smoothly with existing areas rather than disrupting them. The proposed project would also focus on infill development and encourage the intensification of use on vacant and underutilized parcels within the project area. Therefore, the proposed project would not physically divide an established community. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact LU-2 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD BE GENERALLY CONSISTENT WITH APPLICABLE LAND USE PLANS, POLICIES, OR REGULATIONS ADOPTED TO AVOID OR MITIGATE ENVIRONMENTAL EFFECTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Several regionally and locally adopted land use plans, policies, and regulations apply to the proposed project, including Plan Bay Area 2050 (ABAG 2021), the Cotati General Plan, and the Santero Way Specific Plan. Table 4.9-1 addresses the proposed project's consistency with Plan Bay Area 2050.

Table 4.9-1 Project Consistency with Plan Bay Area 2050 Goals

Plan Bay Area Strategies	Project Consistency
H3. Allow a greater mix of housing densities and types in Growth Geographies. Allow a variety of housing types at a range of densities to be built in Priority Development Areas, select Transit-Rich Areas and select High-Resource Areas.	Consistent. The project would allow and encourage the development of additional housing in the project area. The proposed project would facilitate an additional buildout of 769 residential units. The Cotati SMART Station is also located in proximity to project parcels; therefore, development in the project area would provide accessible transit options to residents.
EC4. Allow greater commercial densities in Growth Geographies. Allow greater densities for new commercial development in select Priority Development Areas and Transit-Rich Areas to encourage more jobs to locate near public transit.	Consistent. The project would allow and encourage the development of additional non-residential commercial land uses in the project area. The Cotati SMART Station is also located in proximity to project parcels; therefore, development in the project area would provide accessible transit options to commercial employees and customers.
EN4. Maintain urban growth boundaries. Using urban growth boundaries and other existing environmental protections, focus new development within the existing urban footprint or areas otherwise suitable for growth, as established by local jurisdictions.	Consistent. The project are is located within the City of Cotati and within the City's established urban growth boundary. The SWSP and TOC parcels are either currently vacant or developed with residential or commercial uses, and the project would maintain growth within the existing urban area.

Source: ABAG 2021

Additionally, the proposed project would be consistent with policies in the Cotati General Plan, as shown in Table 4.9-2.

Table 4.9-2 Project Consistency with the Cotati General Plan

Cotati General Plan Policies	Project Consistency
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.	Consistent. The proposed project would encourage mixed-use development in the project area, including on vacant or under-developed sites in the project area.
Policy LU 1.4. Require new development to occur in a logical and orderly manner, focusing growth on infill locations and areas designated for urbanization on the Land Use Map, and be subject to the ability to provide urban services, including paying for any needed extension of services.	Consistent. Development facilitated by the proposed project would occur on infill locations previously designated for urbanization. Development facilitated by the project would be required to pay City-required development fees for the provision of public services and utilities.
Policy LU 1.5. Use sustainable, best management practices in green building, stormwater management, and conservation to mitigate infrastructure impacts, while minimizing effects on water, sewer, and energy resources.	Consistent. The project encourages transit-oriented development in the project area, which would reduce the reliance of future residents on cars and promote energy efficiency. Development facilitated by the project would be required to adhere to current building standards, including California Green Building Standards and City of Cotati requirements for stormwater management. Additionally, as described in Section 4.15, <i>Utilities and Service Systems</i> , the project would not result in the need to expand water, sewer, or energy infrastructure beyond the proposed upsizing of sewer pipeline within Santero Way.
Policy LU 2.1. Development at the interface of residential land use designations with other designations shall be designed to ensure compatibility between the uses and to reduce any potential negative impacts associated with aesthetics, noise, and safety.	Consistent. The project would implement design standards that ensure design compatibility with surrounding existing land uses. By revising development standards related to density, building heights, and allowed uses, the project aims to harmoniously integrate mixed-use and residential areas.
Policy LU 2.3. Locate residences away from areas of excessive noise, smoke, or dust, and ensure that adequate provisions, including a buffer or transitional uses, are made to ensure the health and well-being of existing and future residents.	Consistent. The project would encourage transit-oriented development near the Cotati SMART Station, which minimizes the need for car-dependent infrastructure and reduces pollution. Additionally, the proposed development standards and design guidelines would ensure compatibility with existing land uses and require adequate setbacks, design features, or buffers to mitigate noise and environmental impacts, ensuring the health and well-being of both current and future residents. The project area is not located near existing industrial or other such uses that generate excessive noise, smoke, or dust.
Policy LU 2.4. Maintain the character of existing neighborhoods by ensuring new development is compatible in style, size, color, and footprint with the existing residences in the neighborhood.	Consistent. The project would implement design standards that ensure design compatibility with surrounding existing land uses. By revising development standards related to density, building heights, and allowed uses, the project aims to harmoniously integrate mixed-use and residential areas.
Policy LU 2.5. Locate medium and higher density housing within easy walking or bicycling distance of public facilities, services, transit, and major employers.	Consistent. The project would encourage transit-oriented development in proximity to the Cotati SMART Station and in proximity to existing services within the city.

Cotati General Plan Policies	Project Consistency
Policy LU 2.6. Require new residential development to be consistent with the small-town character of Cotati and designed and landscaped in an aesthetically pleasing and sustainable manner.	Consistent. The project would ensure that new residential development follows updated design standards and guidelines that prioritize aesthetic appeal and sustainability. By integrating mixed-use, neighborhood-serving spaces, and transit-oriented residential units, the project encourages development that is consistent with Cotati's identity.
Policy LU 2.9. Encourage a concentration of neighborhood, community, and retail amenities and services within walking distance of residential areas.	Consistent. The project would promote transit-oriented development in proximity to the Cotati SMART Station. The proposed mixed-use zoning and updated design standards would facilitate the development of neighborhood-serving retail and community spaces near high-density residential areas, making essential services easily accessible to residents on foot or by bicycle.
Policy LU 2.10. Encourage mixed-use, pedestrian-, and transit-oriented development, with a focus on the Hub and major corridors, and continue to prioritize implementation of the Downtown Specific Plan in order to provide a range of housing opportunities and expand the range of goods and services available to nearby residents.	Consistent. The project would encourage mixed-use development in proximity to the Cotati SMART Station, a key transit hub. The project would also encourage the development of internal pedestrian circulation and bicycle facilities. The project area is not located within the Downtown Specific Plan area.
Policy LU 2.11. Continue to mix residential and commercial uses in appropriate areas, with an emphasis on providing mixed uses in the areas with Specific Plan land use designations.	Consistent. The project would encourage higher density mixed-use development within the SWSP area.
Policy LU 3.1. Encourage a vibrant mixture of retail, service, and office uses in the downtown area and along East Cotati Avenue.	Consistent. The project would encourage higher density mixed-use development along East Cotati Avenue, including at the TOC parcels and the northern portion of the SWSP area.
Policy LU 3.2. Encourage infill development of vacant lots within existing commercial districts and the core downtown/business areas and prioritize such development.	Consistent. New development resulting from the proposed project would occur on infill locations, including vacant lots located within the SWSP area.
Policy LU 3.5. In the Specific Plan designations for the Santero Way and downtown areas, encourage residential and office uses in upper-story locations or locations along the periphery of the retail area in order to facilitate active and pedestrian-oriented commercial areas.	Consistent. The project would encourage mixed-use development that integrates both residential and non-residential uses within the project area. By allowing residential units above commercial or office spaces and along the periphery of retail areas, the project would encourage active streetscapes that enhance pedestrian activity and contribute to a vibrant commercial environment. The project would also encourage the development of internal pedestrian circulation and bicycle facilities.
Source: City of Cotati 2015	

The proposed project would also be consistent with the existing Santero Way Specific Plan, as shown in Table 4.9-3.

Table 4.9-3 Project Consistency with the Existing Santero Way Specific Plan

Santero Way Specific Plan Policies	Project Consistency
Objective LU-1. Create a vibrant mixed-use neighborhood that is compatible with and complements the existing small town character of the City of Cotati.	Consistent. The project would implement design standards that ensure design compatibility with surrounding existing land uses and that complements the existing character of existing adjacent development.
Objective LU-4. Reduce visual and other impacts to adjacent residential uses through land use designations, landscape buffering, height limits, and other appropriate methods.	Consistent. The project would implement design standards that ensure design compatibility with surrounding existing land uses. The design standards would include landscape buffering and height limitations. By updating development standards and guidelines, the project aims to create a transition zone between mixed-use developments and existing residential areas, thereby minimizing disruptions and enhancing the overall aesthetic appeal of the project area.
Objective LU-5. Cluster the more intensive uses at the north end of the site, near existing and future transit service and access to East Cotati Avenue.	Consistent. The project would designate areas for higher-density residential and mixed-use development in proximity to the Cotati SMART Station and East Cotati Avenue.
Objective LU-6. Locate uses that will be less sensitive to noise and vibration closer to the Northwestern Pacific railroad r.o.w.	Consistent. The project would integrate commercial and transit-serving uses in proximity to the Cotati SMART Station. Development facilitated by the project would incorporate less noise-sensitive uses nearest to the railroad.
Objective UPS-4. Create a land use pattern, circulation system, and urban design form that provides for enhanced public safety by traditional means (e.g. – fire hydrants, access standards, building codes, etc.) as well as through defensible design (e.g. – uses that result in activity throughout the day and “eyes on the street”).	Consistent. The proposed project would create a land use pattern that encourages mixed-use development in the project area, which promotes continuous activity throughout the day and fosters “eyes on the street.” Development facilitated by the project would be required to adhere to building code requirements and Cotati Municipal Code requirements related to project design features.

Source: City of Cotati 2001

The proposed project development would remain consistent with land use plans and would update the SWSP to include policies consistent with existing land use plans. Implementation of the proposed project would be generally consistent with applicable adopted plans, regulations, or policies. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.9.3 Cumulative Impacts

The geographic scope for cumulative land use and planning impacts is the City of Cotati. This geographic scope is appropriate because the project area is within the planning area for the City of Cotati. Cumulative buildout in this region, including projects listed in Table 3-1, would have the potential to adversely impact land use and planning.

Cumulative development would be required to meet current applicable design standards and would undergo environmental review, including consideration of whether the projects would physically

divide an established community. With these considerations prior to project approval, cumulative impacts related to dividing an established community would be less than significant.

Cumulative projects would be required to adhere to applicable zoning and development regulations and applicable General Plan policies to mitigate environmental impacts where feasible. In addition, all pending and future projects would be reviewed for consistency with the applicable General Plan, and all other applicable regulatory land use actions prior to approval. Therefore, it is anticipated that each cumulative project would be found consistent with applicable plans and policies prior to approval, such that the projects would not cause a significant cumulative environmental impact.

4.10 Noise

This section of this EIR describes existing ambient noise conditions in the project area and analyzes the potential noise-related impacts from implementation of the project. Impacts related to noise and vibration from construction, operational sources, and vehicular traffic are addressed. The analysis is based on the policies from the General Plan (City of Cotati 2015) and the City of Cotati Municipal Code.

4.10.1 Setting

a. Overview of Noise and Vibration

Characteristics of Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013). Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz and less sensitive to frequencies around and below 100 Hertz. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of roadway vehicle volume, would increase the noise level by 3 dBA; reducing the energy in half would result in a 3 dBA decrease (Crocker 2007). Table 4.10-1 shows some representative noise sources and their corresponding noise levels in dBA.

Table 4.10-1 Typical A-Weighted Noise Levels

Indoor Noise Source	Noise Level (dBA)	Outdoor Noise Sources
(Threshold of Hearing in Laboratory)	0	–
Library	30	Quiet Rural Nighttime
Refrigerator Humming	40	Quiet Suburban Nighttime
Quiet Office	50	Quiet Urban Daytime
Normal Conversation at 3 feet	60	Normal Conversation at 3 feet
Vacuum Cleaner at 10 feet	70	Gas Lawn Mower at 100 feet
Hair Dryer at 1 foot	80	Freight Train at 50 feet
Food Blender at 3 feet	90	Heavy-duty Truck at 50 feet
Inside Subway Train (New York)	100	Jet Takeoff at 2,000 feet
Smoke Detector Alarm at 3 feet	110	Unmuffled Motorcycle
Rock Band near stage	120	Chainsaw at 3 feet
–	130	Military Jet Takeoff at 50 feet
–	140	(Threshold of Pain)

Data compiled by Rincon in 2024.

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible; and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud.

Sound changes in both level and frequency spectrum as it travels from the source to the receptor. The most obvious change is the decrease in level as the distance from the source increases. The manner in which noise reduces with distance depends on factors such as the type of sources (e.g., point or line, the path the sound will travel, site conditions, and obstructions). Noise levels from a point source typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance (e.g., construction, industrial machinery, ventilation units). Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance. The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) result from simply the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site (e.g., soft dirt, grass, or scattered bushes and trees). Noise levels may also be reduced by intervening structures. The amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features such as hills and dense woods, and man-made features such as buildings and walls, can substantially alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receptor (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce exposure to noise as well. FHWA’s guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level (L_{eq}); it considers both duration and sound power level. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. Typically, L_{eq} is summed over a one-hour period. L_{max} is the highest root mean squared sound pressure level within the sampling period, and L_{min} is the lowest root mean squared sound pressure level within the measuring period.

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours; it is also measured using Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. Noise levels described by L_{dn} and CNEL usually differ by about 1 dBA or less. The relationship between the peak-hour L_{eq} value and the L_{dn} /CNEL depends on the distribution of roadway noise during the day, evening, and night. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60-plus CNEL range. Normal conversational levels are in the 60 to 65-dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal

Transportation Administration [FTA] 2018). Table 4.10-2 briefly defines measurement descriptors and other sound terminology used in this section.

Table 4.10-2 Sound Terminology

Term	Definition
Sound	A vibratory disturbance created by a vibrating object which, when transmitted by pressure waves through a medium such as air, can be detected by a receiving mechanism such as the human ear or a microphone.
Noise	Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
Ambient Noise	The composite of noise from all sources near and far in a given environment.
Decibel (dB)	A unitless measure of sound on a logarithmic scale, which represents the squared ratio of sound-pressure amplitude to a reference sound pressure. The reference pressure is 20 micropascals, representing the threshold of human hearing (0 dB).
A-Weighted Decibel (dBA)	An overall frequency-weighted sound level that approximates the frequency response of the human ear.
Equivalent Noise Level (L_{eq})	The average sound energy occurring over a specified time period. In effect, L_{eq} is the steady-state sound level that in a stated period would contain the same acoustical energy as the time-varying sound that actually occurs during the same period.
Ambient Noise	The composite of noise from all sources near and far in a given environment.
Maximum and Minimum Noise Levels (L_{max} and L_{min})	The maximum or minimum instantaneous sound level measured during a measurement period.
Day-Night Level (DNL or L_{dn})	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m. (nighttime).
Community Noise Equivalent Level (CNEL)	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the A-weighted sound levels occurring between 7:00 p.m. and 10:00 p.m. and 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m.

Definitions compiled by Rincon in 2024.

Characteristics of Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hertz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibrations that can be felt by the human body is from a low of less than 1 Hertz up to a high of about 200 Hertz (Crocker 2007). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration.

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hertz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018).

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is impacted by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Vibration amplitudes are usually expressed in peak particle velocity (PPV). The PPV is normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration and other construction activity because it is related to the stresses that are experienced by buildings (Caltrans 2020). Table 4.10-3 summarizes the vibration damage criteria recommended by Caltrans for evaluating the potential for architectural damage to buildings.

Table 4.10-3 Maximum Vibration Levels for Preventing Damage

Building Type	Limiting Velocity (in/sec PPV)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2 to 0.3
Residential buildings in good repair with gypsum board walls	0.4 to 0.5
Engineered structures, without plaster	1.0 to 1.5

in/sec = inches per second; PPV = peak particle velocity
Source: Caltrans 2020

Noise-Sensitive Land Uses

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise-sensitive land uses are typically defined as single and multi-family residential; hotels and motels; group homes, hospitals, parks and extended medical facilities; churches; schools and other learning institutions; and libraries. Sensitive land uses generally should not be subjected to noise levels that would be considered intrusive in character. The primary type of sensitive receptors in the project area vicinity are residences and park users.

b. Existing Noise Conditions and Sources

The predominant source of noise in the project area, as in most communities, is motor vehicles. Motor vehicle noise is characterized by a high number of individual events that can create a sustained noise level in proximity to noise-sensitive uses. Roadways with the highest roadway vehicle volumes and speeds produce the highest noise levels. The roadways in the project area with the highest roadway vehicle volumes and, thus, the highest noise levels are East Cotati Avenue and other surface streets ranging from two to four lanes, shown in Table 4.10-4. The Sonoma-Marín Area Rail Transit (SMART) rail is another source of noise in the project area. Based on the 2005 Draft Environmental Impact Report (EIR) prepared for the SMART rail project (Parsons Brinckerhoff 2005), noise levels generated by the SMART rail were predicted to range between 47 and 54 dBA L_{dn} at a distance of 50 feet from the tracks, depending on the location along the rail corridor. Noise levels at the location closest to the project area, the downtown Petaluma station, were estimated to reach approximately 47 dBA L_{dn} at 50 feet from the tracks, based on train pass-bys without the use of the

train horn (Parson Brinckerhoff 2005). In addition, ambient noise monitoring conducted near a portion of SMART rail in San Rafael determined that the 60 dBA L_{dn} noise contour from SMART rail activity did not extend beyond 50 feet from the tracks (PlaceWorks 2021). Furthermore, Sonoma County has established Quiet Zones for SMART lines, which prohibit the use of train horns at crossings, unless in case of emergencies (Federal Railroad Administration [FRA] 2022). In commercial and retail areas, truck loading docks and mechanical equipment can be a source of localized noise.

Table 4.10-4 Existing Roadway Vehicle Noise Along Roadway Segments

Roadway Segment	Existing ADT ¹	Existing Roadway Vehicle Noise Level at 50 feet (dBA L_{dn}) ²
Santero Way south of East Cotati Avenue	1,160	54.7
Lancaster Drive south of East Cotati Avenue	6,260	62.1
East Cotati Avenue west of Adrian Drive	23,250	70.7
Old Redwood Highway north of Cotati Avenue	24,490	71.0
Old Redwood Highway south of Cotati Avenue	12,950	68.1
West Sierra Ave west of Old Redwood Highway	11,860	67.7

ADT = average daily trips

¹ Source: Appendix E

² The overall increase in traffic noise was estimated based on the FHWA RD-77-108 traffic noise prediction model using data provided by Fehr & Peers (Appendix E).

4.10.2 Regulatory Setting

a. Federal Regulations

Federal Transit Administration

The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in the *Transit and Noise Vibration Impact Assessment Manual* (FTA 2018). For residential uses, the daytime noise threshold is 80 dBA L_{eq} for an 8-hour period.

Occupational Health and Safety Administration

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration under the United States Environmental Protection Agency. Noise limitations would apply to the operation of construction equipment and could also apply to any proposed industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under Occupational Health and Safety Administration, and is not addressed further in this analysis.

b. State Regulations

California Building Code

California Code of Regulations Title 24, Building Standards Administrative Code, Part 2, Chapter 12, and the California Building Code codify the State noise insulation standards. These noise standards apply to new construction in California to control interior noise levels as they are affected by exterior noise sources and interior noise sources from separate areas. The regulations specify that

interior noise levels shall not exceed 45 dB CNEL/L_{dn} in any habitable room, as well as specifying sound transmission class requirements for walls, floors, and ceilings around sleeping units.

California Green Building Code

California Green Building Standards Code 2022 (CALGreen) Section 5.507.4, Acoustical Control, regulates construction of non-residential uses within the 65 dBA CNEL/L_{dn} contour of an airport, freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1.1 “buildings exposed to a noise level of 65 dB L_{eq}(1-hr) during any hour of operation shall employ sound-resistant assemblies as determined by a prescriptive method (CALGreen Section 5.507.4.1) or performance method (CALGreen Section 5.507.4.2).

Projects may demonstrate compliance through the prescriptive method if wall and roof-ceiling assemblies exposed to the noise source meet a composite sound transmission class rating of at least 50 or a composite outdoor/indoor transmission class rating of no less than 40, with exterior windows of a minimum sound transmission class rating of 40 or outdoor/indoor transmission class rating of 30. Projects may demonstrate compliance through the performance method if wall and roof-ceiling assemblies exposed to the noise source are constructed to provide an interior noise environment that does not exceed 50 dB L_{eq}(1-hr) in occupied areas during hours of operations.

c. Local Regulations

Cotati General Plan

Table 4.10-5 shows the Cotati General Plan noise and land use compatibility standards for community noise exposure.

Table 4.10-5 City of Cotati Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure (L _{dn} or DNL, dBA)		
	Normally Acceptable	Conditionally Acceptable	Unacceptable
Single-Family Residential	50-60	60-75	<75+
Multi-Family Residential, Hotels, and Motels	50-65	65-75	<75+
Outdoor Sports and Recreation, Neighborhood Parks and Playgrounds	50-65	65-80	<80+
Schools, Libraries, Museums, Hospitals, Personal Care, Meeting Halls, Churches	50-65	65-75	<75+
Office Buildings, Businesses Commercial and Professional	50-67.5	67.5-77.5	<77.5+
Auditoriums, Concert Halls, Amphitheaters	–	50-70	<70+
Industrial	50-70	70-80	<80+

L_{dn} or DNL = Day-Night Average Sound Level; dBA = A-weighted sound pressure level

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable: Specified land use may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features included in the design.

Unacceptable: New construction or development should generally not be undertaken because mitigation is usually not feasible to comply with noise element policies.

Source: City of Cotati 2015

In addition to the City's noise compatibility standards, the following goals and policies from the General Plan Noise Element are relative to the proposed project:

Goal N-1: Create a pleasant sound environment by minimizing exposure to harmful and annoying noise.

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 1.2: Require development and infrastructure projects to be consistent with the Land Use Compatibility for Community Noise Environments standards indicated in Table 4.10-5 to ensure acceptable noise levels at existing and future uses.

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 1.6: 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 California Environmental Quality Act to analyze noise impacts, of noise impacts for development, transportation, and other projects that increase noise:

Stationary and Non-Transportation Noise Sources

- 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.

Transportation Noise Sources

- Where existing traffic noise levels are less than 60 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +5 dB L_{dn} increase in roadway noise levels will be considered significant; and
- Where existing traffic noise levels range between 60 and 65 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +3 dB L_{dn} increase in roadway noise levels will be considered significant; and
- Where existing traffic noise levels are greater than 65 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +1.5 dB L_{dn} increase in roadway noise levels will be considered significant.

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

Policy N 1.11: Require acoustical studies and mitigation measures, where necessary, for new developments and transportation improvements that affect noise sensitive uses such as schools, hospitals, libraries, group care facilities, convalescent homes, and residential areas.

Policy N 1.12: Require construction activities to comply with standard “best practices” (See Action N 1h).

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.

Action N 1h: During the environmental review process, determine if proposed construction will constitute a significant impact on nearby residents and require mitigation measures in addition to the standard “best practice” controls. Suggested “best practices” for control of construction noise:

- Construction period shall be less than twelve months.
- 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 subject to the same hours specified for construction equipment.
- Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing
- 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.

Cotati Municipal Code

Section 17.30.050 of the Cotati Municipal Code contains the City's noise level standards. Relevant sections in the noise ordinance include the following:

C. Noise Source Standards.

1. **Noise Level Limitations.** No use, activity, or process within the city shall generate noise in excess of the levels identified by Table 4.10-6 and Table 4.10-7, as the noise is measured at the property line of a noise sensitive land use identified in Table 4.10-6 and Table 4.10-7.
 - a. If the measured ambient noise level exceeds the applicable noise level standard in any category shown in Table 4.10-6, the applicable standards shall be adjusted to equal the ambient noise level.
 - b. If the intruding noise source is continuous and cannot reasonably be discontinued or stopped to allow measurement of the ambient noise level, the noise level measured while the source is in operation shall be compared directly to the applicable noise level standards identified in Table 4.10-6.

Notwithstanding the above requirements, no person shall allow or cause the generation of any noise of a type, volume, pitch, tone, repetition, or duration that would be found to be a nuisance by a reasonable person beyond the boundaries of the property where the noise is generated.

Table 4.10-6 Maximum Allowable Noise Level by Receiving Land Use

Noise Sensitive Land Use	Outdoor Activity Areas ^{1,2}	Interior Spaces	
	dBA L _{dn}	dBA L _{dn}	dBA L _{eq}
Residential	65	45	N/A
Transient Lodging	65	45	N/A
Hospitals, extended care	65	45	N/A
Theater, auditorium	— ³	45	35
Meeting facility, public or private	65	45	40
Offices	75	45	45
School, library, museum	65	45	45
Playground park	70	N/A	N/A

dBA = A-weighted decibel; L_{dn} = Day-Night Average Level; N/A = Not Applicable

¹ Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use.

² Where it is not possible to reduce noise in outdoor activity areas to 65 dB L_{dn}/CNEL or less using a practical application of the best-available noise reduction measures, an exterior noise level of up to 70 dB L_{dn}/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

³ Subject to an acoustical analysis.

Source: Chapter 17, Section 17.30.050, City of Cotati Municipal Code

Table 4.10-7 Noise Standards for Short-Duration Events Near Residential Areas

Sound Level	Maximum Allowable Sound Level ¹	
	Day/Evening dB (7 a.m. to 10 p.m.)	Night dB (10 p.m. to 7 a.m.)
Hourly L_{eq} dB	50	45
Maximum Level, dB	70	65
Maximum Level, dB, for Impulsive Sound	65	60

dB = decibel; L_{eq} = equivalent noise level
¹ If the offensive noise contains a steady, audible tone (e.g., a screech or hum), is a repetitive noise (e.g., hammering), or contains speech or music, the maximum allowable sound level shall be reduced by 5 dB.
Source: Chapter 17, Section 17.30.050, City of Cotati Municipal Code

2. **Acoustical Analysis Required.** Where the director determines that a proposed project may generate noise in excess of any limit established by Table 4.10-6, and/or where the use may generate noise in outdoor areas in excess of 60 dBA, the land use permit application for the use shall include an acoustical analysis by a qualified professional approved by the director.
 - a. **Contents.** The analysis shall determine the potential for stationary source noise impacts to neighboring land uses, include field measurements to determine more precise locations for existing and projected future noise levels (based on traffic projections in the circulation element of the general plan or as otherwise accepted by the city), and recommend appropriate mitigation measures.
 - b. **Preferred Mitigation Measures for Receptor Sites.** When development is subject to high noise levels requiring mitigation, the following measures shall be considered and preference shall be given where feasible in the following order:
 - i. Site layout, including setbacks, open space separation and shielding of noise-sensitive uses with non-noise-sensitive uses;
 - ii. Acoustical treatment of buildings; or
 - iii. Structural measures such as constructed of earth berms and/or wood or concrete barriers; provided that no sound wall shall be located adjacent to a public street.
3. **Limitation on Hours of Construction.** In order to allow construction schedules to take advantage of the weather and normal daylight hours, and to ensure that nearby residents as well as nonresidential activities are not disturbed by the early morning or late night activities, the city has established the following limits on construction, in compliance with Table 4.10-8 or as required by conditions of approval.

Table 4.10-8 City of Cotati Allowable Hours of Construction

Day	Allowable Hours
Monday through Friday	7:00 a.m. to 7:00 p.m.
Saturday and Sunday, Holidays	Construction activities may only be allowed by the review authority through conditions of approval between 9:00 a.m. and 5:00 p.m.

Source: Chapter 17, Section 17.30.050, City of Cotati Municipal Code

D. Noise Receptor Standards.

Where noise-sensitive land uses are proposed in areas exposed to existing or projected noise levels in excess of the standards in Table 4.10-6 and Table 4.10-7, the city shall require an acoustical analysis as part of the environmental review process so that noise mitigation may be included in the project design, so that proposed structures are designed to limit intruding noise in interior rooms to 45 dBA L_{dn} . At the discretion of the director, the requirement for an acoustical analysis may be waived if all of the following conditions are satisfied:

1. The development is for less than five single-family dwellings or less than ten thousand square feet of total gross floor area for office buildings, churches, or meeting halls;
2. The noise source in question consists of a single roadway or railroad for which up-to-date noise exposure information is available. An acoustical analysis will be required if the noise source is a stationary noise source, or if there are multiple noise sources that could affect the project;
3. The projected future noise exposure at the exterior of proposed buildings or outdoor activity areas does not exceed 65 dBA L_{dn} ;
4. The topography of the area is essentially flat; and
5. Effective noise mitigation, as determined by the director, is incorporated into the project design. The measures can include, but are not limited to, the use of building setbacks, building orientation, or noise barriers. If closed windows are required for compliance with interior noise level standards, air conditioning or a mechanical ventilation system will be required.

4.10.3 Impact Analysis

a. Significance Thresholds

In accordance with Appendix G of the *CEQA Guidelines*, a significant noise impact would occur if new development facilitated by the proposed project would:

1. Generate 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;
2. Generate excessive groundborne vibration or groundborne noise levels; and/or
3. 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.

Construction Noise

The City does not define a quantitative construction noise threshold; therefore, for the purposes of analyzing impacts from development facilitated by the project, the FTA threshold for construction noise will be used. The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual* (FTA 2018). For residential uses, the daytime noise threshold for an 8-hour period is 80 dBA L_{eq} . Construction noise would have a significant impact if it exceeds this threshold.

Operational Stationary Source Noise

The City of Cotati has adopted exterior and interior noise standards for residential land uses that state that residential noise-sensitive land uses cannot be exposed to a maximum noise level exceeding 70 dBA or higher between the daytime hours of 7:00 a.m. to 10:00 p.m. and 65 dBA or higher between the nighttime hours of 10:00 p.m. to 7:00 a.m., as shown in Table 4.10-7 above.

Operational Traffic Noise

For traffic-related noise, impacts would be significant if the project would result in exposure of sensitive receptors to an unacceptable increase in noise levels. The City of Cotati has specific noise level criteria for assessing traffic noise impacts (City of Cotati 2015). A significant impact would occur if traffic noise increases the existing noise environment by the following:

- 1.5 dBA L_{dn} or greater for ambient noise environments of 65 dBA L_{dn} and higher.
- 3 dBA L_{dn} or greater for ambient noise environments of 60 to 64 L_{dn} .
- 5 dBA L_{dn} or greater for ambient noise environments of less than 60 dBA L_{dn} .

Groundborne Vibration

The City has adopted significance thresholds in General Plan Policy N 1.15 (City of Cotati 2015) to assess vibration impacts during construction and operation. For sensitive historic structures, a vibration limit of 0.08 in/sec PPV is used to minimize the potential for cosmetic damage to the building. A vibration limit of 0.30 in/sec PPV is used to minimize the potential for cosmetic damage at buildings of normal conventional construction.

Land Use Compatibility

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal. 4th 369 (No. S 213478), December 17, 2015), it is generally no longer the purview of the CEQA process to evaluate the impact of existing environmental conditions on any given project. As a result, while the noise from existing sources is taken into account as part of the baseline, the direct effects of exterior noise from nearby noise sources relative to land use compatibility of a future project as a result of General Plan buildout is typically no longer a required topic for impact evaluation under CEQA. Generally, no determination of significance is required with the exception of certain school projects, projects affected by airport noise, and projects that would exacerbate existing conditions (i.e., projects that would have a significant operational impact). As required by General Plan Policy N 1.2, the noise and land use compatibility standards shown on Table 4.10-5 would be applied in land use decisions, including maintaining the maximum noise standards for outdoor and common use areas. At the discretion of the Cotati building department, requirements may include, but not necessarily be limited to, acoustical studies that show noise reduction features, acoustical design in new construction, and other methods that provide compliance with the California Building Code and City provisions for acceptable indoor and outdoor noise levels.

b. Methodology

Construction Noise

Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in a single location for one or more days at a time, with either fixed-

power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Mobile equipment moves around a construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders (FTA 2018). Each phase of typical construction has its own noise characteristics due to specific equipment mixes; some will have higher continuous noise levels than others and some may have high-impact intermittent noise levels (FTA 2018). Therefore, construction noise levels may fluctuate depending on the type of equipment being used, construction phase, or equipment location. In typical construction projects on vacant sites, grading activities typically generate the highest noise levels because grading involves the largest equipment and covers the greatest area. For assessment purposes, potential construction noise impacts from construction activities were modeled at a reference distance of 50, 100, and 200 feet to analyze potential construction noise levels due to setback distances between equipment and nearby sensitive receptors.

Impact devices such as pile drivers, although unlikely, may be used for construction facilitated by the project. A pile driver is used to drive foundation piles into the ground. Although the use of pile drivers is uncommon during construction for the types of development facilitated by the project, this analysis considers the potential for use of this equipment as a conservative analysis as some terrain features, (i.e. soft, unstable soil conditions or a high water table) or building height (2+ story buildings depending on soil conditions) may require their use. These devices would typically operate separately from other equipment.

Stationary Operational Noise

Stationary noise (i.e., on-site operational noise) was analyzed in context of typical mechanical equipment on commercial, industrial, residential and mixed-use development such as heating, ventilation, and air conditioning (HVAC) units, landscaping and maintenance activities, and loading docks.

Operational Traffic Noise Increases

Vehicle trip noise impacts are analyzed based on transportation data provided in a Transportation Impact Analysis prepared for the project area (Appendix E). The overall increase in traffic noise was estimated based on the FHWA RD-77-108 traffic noise prediction model using roadway segment traffic volume for existing conditions and future conditions with development envisioned in the project area.

Groundborne Vibration

Development envisioned by the project would not include substantial sources of vibration associated with operation because the project area largely envisions commercial and residential development. These uses typically do not generate substantial vibration because they do not involve use of heavy machinery. Therefore, construction activities have the greatest potential to generate groundborne vibration affecting nearby receptors, especially during grading, excavation, and paving.

Because groundborne vibration could cause physical damage to structures and is measured in an instantaneous period, vibration impacts are typically modeled based on the distance from the location of vibration-intensive construction activities, which is conservatively assumed to be the edge of a project site, to the edge of the nearest off-site structures. For assessment purposes, potential vibration impacts from construction activities were modeled at a reference distance of 25

feet to analyze potential vibration levels due to setback distances between equipment and off-site structures.

c. Project Impacts and Mitigation Measures

Threshold 1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact NOI-1 CONSTRUCTION OF DEVELOPMENT FACILITATED BY THE PROJECT WOULD TEMPORARILY INCREASE NOISE LEVELS AT NEARBY NOISE-SENSITIVE RECEPTORS. OPERATION OF DEVELOPMENT FACILITATED BY THE PROJECT WOULD INTRODUCE NEW NOISE SOURCES AND CONTRIBUTE TO INCREASES IN TRAFFIC NOISE. CONSTRUCTION AND OPERATIONAL NOISE COULD EXCEED NOISE STANDARDS. CONSTRUCTION NOISE AND OPERATIONAL TRAFFIC NOISE IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE DESPITE THE IMPLEMENTATION OF MITIGATION.

Construction

Construction noise from individual development projects facilitated by the project would temporarily increase noise levels at nearby noise-sensitive receptors. At this stage of planning, project-level details are not available for future individual projects that could be carried out as development facilitated by the project. Therefore, it is not possible to determine exact noise levels, locations, or time periods for construction of such individual projects, or construction noise at adjacent properties. However, based on typical construction activities, development would typically generate noise from activities such as demolition, site preparation, grading, building construction, and paving. Each phase or type of construction has a specific equipment mix and associated noise characteristics, depending on the equipment used during that phase or project. Construction noise would typically be higher during the more equipment-intensive phases of initial construction (i.e., demolition, site preparation, and grading work) and would be lower during the later construction phases (i.e., building construction and paving). Development facilitated by the proposed project would also be subject to Action N 1h in the Cotati General Plan (City of Cotati 2015), which requires projects to determine if proposed construction will constitute a significant impact on nearby residents and require mitigation measures in addition to the standard “best practice” controls. Table 4.10-9 illustrates typical noise levels associated with construction equipment at distances of 50 feet, 100 feet, and 200 feet. Noise levels are shown to a maximum of 200 feet because the project area is urbanized and developed, and existing sensitive noise receptors would generally occur within 200 feet or less of development within the project area.

Table 4.10-9 Typical Noise Levels for Construction Equipment

Equipment	Estimated Noise Levels at Standard Distances from Noise Source (dBA L _{eq})		
	50 feet	100 feet	200 feet
Air Compressor	80	74	68
Backhoe	80	74	68
Concrete Mixer	85	79	73
Dozer	85	79	73
Grader	85	79	73
Jack Hammer	88	82	76
Loader	80	74	68
Paver	85	79	73
Pile-driver (Impact)	101	95	89
Pile-driver (Sonic)	95	89	83
Roller	85	79	73
Saw	76	70	64
Scarified	83	77	71
Scraper	85	79	73
Truck	84	78	72

Source: FTA 2018.

As shown in Table 4.10-9, construction noise may exceed the FTA's daytime noise limits of 80 dBA L_{eq}, depending on the equipment used and the distance in which the equipment is operating compared to noise-sensitive receptors. Therefore, construction noise levels associated with future projects may exceed the daytime FTA construction noise threshold of 80 dBA L_{eq} for an 8-hour period at residential uses and other noise sensitive receptors, and impacts would be potentially significant.

Operation

Stationary Noise

Stationary sources of noise may occur on all types of land uses. Residential uses would generate noise from landscaping, maintenance activities, and mechanical equipment such as ground-level and rooftop HVAC systems. Commercial uses would generate stationary noise from HVAC systems, loading docks, and other sources. Noise generated by residential or commercial uses is generally short and intermittent.

However, since at this stage of planning, project-level details are not available for future individual development projects that would be facilitated by the project, it is not possible to determine operational noise levels and the locations of stationary noise sources. Stationary operational noise could exceed the City's daytime maximum exterior sound level of 70 dBA and nighttime maximum exterior sound level of 65 dBA for residential noise sensitive land uses. Therefore, stationary operational impacts from development facilitated by the project would be potentially significant.

Traffic Noise

The project would encourage higher-intensity, mixed-use neighborhoods in the project area than are currently permitted, leading to additional vehicle trips on area roadways. As described in Section 2, *Project Description*, the project envisions a maximum of 769 dwelling units and 651,365 square feet of non-residential commercial land uses in the SWSP area and TOC Parcels. By generating new vehicle trips, new development would incrementally increase the exposure of land uses along roadways to traffic noise.

Table 4.10-10 summarizes the estimated traffic noise when the project vehicle trips are added to existing traffic on key roadway segments in the project area based on average daily traffic (ADT) volumes (Appendix E). As shown in Table 4.10-10, the maximum increase in traffic noise would be 11.3 dBA L_{dn} under forecast buildout plus project conditions along Santero Way, south of East Cotati Avenue. This would exceed the significance threshold of an increase of 5 dBA L_{dn} identified in *Significance Thresholds*, discussed above. All other roadway segments would not exceed the most stringent significance threshold of 1.5 dBA L_{dn} . Increased traffic noise on Santero Way would be a potentially significant impact.

Table 4.10-10 SWSP Traffic Noise Increases

Roadway Segment	Existing		Forecast Buildout No Project		Forecast Buildout + Project		SWSP Plan Area Traffic Noise Increase ¹ (dBA) L_{dn}
	ADT	(dBA) L_{dn}	ADT	(dBA) L_{dn}	ADT	(dBA) L_{dn}	
Santero Way south of East Cotati Avenue	1,160	54.7	19,040	66.9	15,800	66.1	11.3
Lancaster Drive south of East Cotati Avenue	6,260	62.1	6,460	62.2	6,440	62.2	0.1
East Cotati Avenue west of Adrian Drive	23,250	70.7	33,140	72.3	31,920	72.1	1.4
Old Redwood Highway north of Cotati Avenue	24,490	71.0	32,640	72.2	32,230	72.1	1.2
Old Redwood Highway south of Cotati Avenue	12,950	68.1	13,290	68.2	13,390	68.2	0.1
West Sierra Avenue west of Old Redwood Highway	11,860	67.7	12,140	67.8	11,640	67.6	-0.1

Notes: ADT = average daily traffic

¹ Noise increase value is determined by the difference between Forecast Buildout + Project – Existing Conditions.

The estimated traffic noise increase is based on the FHWA RD-77-108 traffic noise prediction model (Appendix D).

Source: Data provided by Fehr & Peers (Appendix E).

Mitigation Measures

N-1a Construction-Related Noise Reduction Measures

Similar to Action N 1h in the Cotati General Plan (City of Cotati 2015), the City shall require, as a standard condition of approval, that project applicants apply the following measures during construction of individual development projects within the project area.

- **Mufflers.** Construction equipment shall be properly maintained and all internal combustion engine driven machinery with intake and exhaust mufflers and engine shrouds, as applicable, shall be in good condition and appropriate for the equipment. During construction, all equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers, consistent with manufacturers' standards.
- **Electrical Power.** Electrical power, rather than diesel equipment, shall be used to run compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.
- **Stationary Equipment.** All stationary equipment shall be staged as far away from the adjacent sensitive receptors as feasible.
- **Equipment Idling.** Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use.
- **Workers' Radios.** All noise from workers' radios shall be controlled to a point that they are not audible at sensitive receptors near construction activity.
- **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction in compliance with applicable safety laws and regulations.
- **Disturbance Coordinator.** The applicant shall designate a disturbance coordinator who shall be responsible for responding to any local complaints about construction noise. The noise disturbance coordinator shall determine the cause of the noise complaint and shall require that reasonable measures warranted to correct the problem be implemented. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.
- **Temporary Sound Barriers.** Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA L_{eq} at residential receivers, schools or other sensitive receptors during the daytime) and when the anticipated construction duration is greater than is typical (e.g., two years or greater). Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class 32 or higher.

N-1b Conduct Stationary Operational Noise Analysis

The City shall require future development projects that are subject to General Plan Policies N 1.2, N 1.3 and N 1.11 as a condition of approval and to implement any required mitigation measures as recommended by a qualified acoustical consultant to minimize impacts on these uses. Examples of mitigation measures to reduce on-site noise include, but are not limited to, operational restrictions, selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.

Significance After Mitigation

Construction Noise

The effective use of temporary noise barriers, as required under Mitigation Measure N-1a can achieve up to 20 dBA of noise reduction (Harris 1991; Bies, Hansen, Howard 2018), at nearby residential properties to the surrounding sensitive receptors. However, the greatest reduction would be at ground-floor receptors, and they may not be as effective for residential buildings with multiple stories. As exact details of future project-specific construction activities are unknown at this stage of planning, construction noise could still exceed the residential daytime significance threshold. Therefore, construction noise impacts would remain significant and unavoidable.

Stationary Noise (Operational)

Implementation of Mitigation Measure N-1b would ensure that future developments projects in the project area would be conditioned to reduce stationary operational noise below the City's noise standards and impacts to less than significant.

Traffic Noise (Operational)

For the traffic noise impacts on the Santero Way roadway segment, the following mitigation measure was considered to reduce traffic noise that would be generated by development facilitated by the proposed project:

- **Special Roadway Paving** - Notable reductions in tire noise have been achieved via the implementation of special paving materials, such as rubberized asphalt or open-grade asphalt concrete overlays. For example, the California Department of Transportation conducted a study of pavement noise along Interstate 80 in Davis (Caltrans 2011), which was applied to a similar project in Thousand Oaks conducted by Rincon Consultants (Rincon 2023) that included roadways with 35 miles per hour speed limits and found an average improvement of 6-7 dBA compared to conventional asphalt overlay.

Although this amount of noise reduction from rubberized/special asphalt materials would be sufficient to avoid the predicted noise increase due to traffic in some cases, the potential up-front and ongoing maintenance costs are such that the cost versus benefits ratio¹ may not be feasible and reasonable and would not mitigate noise to a level of less than significant in the case of Santero Way, where a traffic noise increase of 11.3 dBA CNEL is estimated. In addition, the Caltrans study found that noise levels increased over time due to pavement raveling, with the chance of noise level increases higher after a 10-year period. Since this mitigation measure would not result in permanently reduced traffic noise levels along Santero Way, and there are no other feasible mitigation measures available, increased traffic noise on Santero Way would result in a significant and unavoidable impact.

Additionally, it is important to note that traffic noise would be decreased by approximately 0.8 dBA CNEL from the Forecast Buildout No Project scenario's estimated traffic noise level of 66.9 dBA CNEL on Santero Way, which uses data from the City's General Plan (refer to Table 4.10-10). Furthermore, predicted future traffic noise levels along Santero Way provide a conservative estimate of future traffic noise, as it does not take into consideration that the roadway segment ends in a dead end, where an amount of vehicle trips would terminate near the north end of the roadway at the

¹ Cost versus benefit considerations are in terms of the number of households benefited, per the general methodology employed by Caltrans in the evaluation of highway sound walls.

proposed residences and SMART station. Finally, when compared to roadways of similar size and surrounding land uses (refer to Table 4.10-10 for similar roadways, including East Cotati Avenue and West Sierra Avenue), the predicted ambient traffic noise along Santero Way would be lower than and consistent with these comparable roadways in the project vicinity.

However, because the future traffic noise level along Santero Way would exceed the threshold established in Section 4.10.3(a), *Significance Thresholds*, for traffic noise level increases, and because there is no feasible mitigation that can fully reduce this impact, traffic noise impacts would be significant and unavoidable.

Threshold 2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2 CONSTRUCTION OF DEVELOPMENT FACILITATED BY THE PROJECT WOULD TEMPORARILY GENERATE GROUNDBORNE VIBRATION. IF REQUIRED FOR CONSTRUCTION, PILE DRIVING OR USE OF A VIBRATORY ROLLER OR HEAVY EARTHMOVING EQUIPMENT COULD POTENTIALLY EXCEED THE CITY OF COTATI'S VIBRATION THRESHOLDS AND IMPACT PEOPLE OR BUILDINGS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction Vibration

Construction of development facilitated by the project would intermittently generate groundborne vibration, which could be felt or experienced at nearby sensitive receptors. Table 4.10-11 lists groundborne vibration levels from various types of construction equipment at various distances. Although groundborne vibration is sometimes noticeable in outdoor environments, groundborne vibration is almost never annoying to people who are outdoors; the vibration level threshold for human perception is assessed at occupied structures (FTA 2018). Therefore, vibration impacts are assessed at the structure of an affected property.

Table 4.10-11 Construction Equipment Vibration Levels

Equipment		Approximate Vibration Level (in/sec PPV)			
		25 feet from Source	50 feet from Source	100 feet from Source	200 feet from Source
Caisson Drilling		0.089	0.031	0.011	0.004
Jackhammer		0.035	0.012	0.004	0.002
Large Bulldozer		0.089	0.031	0.011	0.004
Loaded Truck		0.076	0.027	0.010	0.003
Pile Driver (impact)	Upper range	1.518	0.537	0.190	0.067
	Typical	0.644	0.228	0.081	0.028
Pile Driver (sonic)	Upper range	0.734	0.260	0.092	0.032
	Typical	0.170	0.060	0.021	0.008
Small Bulldozer		0.003	0.001	<0.001	<0.001
Vibratory Roller		0.210	0.074	0.026	0.009

In/sec = inches per second; PPV = peak particle velocity
Source: FTA 2018.

As shown in Table 4.10-11, sensitive receptors and buildings could experience the strongest vibration during the use of pile drivers and vibratory rollers. Vibration levels from pile drivers could approach 1.518 in/sec PPV at 25 feet from the source and 0.190 in/sec at 100 feet, and vibration levels from vibratory rollers could approach 0.21 in/sec PPV at 25 feet and 0.026 at 100 feet. As discussed under *Significance Thresholds* above, the most conservative threshold is for historical structures at 0.08 in/sec PPV, and the threshold for buildings of normal conventional construction is 0.3 in/sec.

Based on the attenuation distances of vibration from construction equipment, projects that require pile driving during construction within 180 feet of fragile structures such as historical resources such as the age-eligible structures located within the project vicinity (see Section 4.4, *Cultural Resources*), or within 75 feet of buildings of conventional construction such as the nearby residential buildings; a vibratory roller within 50 feet of fragile structures such as historical resources, or within 20 feet of buildings of conventional construction; or a dozer or other heavy earthmoving equipment within 27 feet of fragile structures such as historical resources, or within 12 feet of buildings of conventional construction, could result in potentially significant impacts.

At this stage of planning, project-level details are not available for individual development that could be carried out as envisioned in the project area, and it is not possible to determine which individual development projects may use specific types of equipment and their exact vibration levels, locations, or time periods for construction of such projects. Therefore, construction vibration levels may exceed the City of Cotati's vibration thresholds of 0.08 in/sec for historic structures and 0.3 in/sec PPV for building of normal conventional construction for preventing building architectural damage, and impacts would be potentially significant.

Operational Vibration

Residential, commercial and retail land use development facilitated by the project would not involve substantial new vibration sources associated with operation. Much of the project area is developed with the same uses envisioned by the project. Therefore, vibration impacts generated by the operation of the project would be less than significant.

Mitigation Measures

N-2 Vibration Control Plan

Prior to issuance of a building permit for a project in the project area that would require the use of pile driving during construction within 180 feet of fragile structures such as historical resources or within 75 feet of buildings of conventional construction; a vibratory roller within 50 feet of fragile historical resources or 20 feet of buildings of conventional construction; or a dozer or other large earthmoving equipment within 27 feet for a fragile historical structure or 12 feet of buildings of conventional construction, the project applicant shall prepare a vibration analysis to assess and mitigate potential noise and vibration impacts related to these construction activities. This vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed the City of Cotati's vibration criteria for architectural damage thresholds (e.g., 0.08 in/sec PPV for fragile or historical resources and 0.3 in/sec PPV for buildings of conventional construction). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, static rollers as opposed to vibratory rollers, and lower horsepower earthmoving equipment shall be used. If alternative methods are not feasible or vibration levels are still predicted to exceed the City's standards, construction vibration monitoring

shall be conducted to ensure vibration thresholds are not exceeded. The study should be submitted to the City prior to permit approval for review and confirmation that the requirements of this measure have been incorporated.

Significance After Mitigation

Alternative equipment near off-site receptors would be used to reduce construction related vibration. Specifically, use of an auger drill would generate vibration levels of approximately 0.089 in/sec PPV at a distance of 25 feet, which would attenuate to 0.005 in/sec PPV at a distance of 180 feet (FTA 2018). Use of a static roller would generate vibration levels of approximately 0.05 in/sec PPV at a distance of 25 feet (McIver 2012), which would attenuate to 0.018 at a distance of 50 feet. Grading and earthwork equipment that is limited to 100 horsepower or less (small bulldozer) would generate 0.003 in/sec PPV at a distance of 25 feet, which would attenuate to 0.0027 in/sec PPV at a distance of 27 feet. With implementation of Mitigation measure N-2, project groundborne vibration would be less than the significance threshold of 0.08 in/sec PPV at historic buildings. Therefore, with implementation of Mitigation Measure N-2, project construction vibration impacts would be reduced to less than significant.

Threshold 3: 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?

Impact NOI-3 THE PROPOSED PROJECT WOULD NOT EXPOSE PEOPLE RESIDING OR WORKING THE PLAN AREA TO EXCESSIVE NOISE LEVELS FROM AIRPORT LAND USE. THERE WOULD BE NO IMPACT.

The closest airport to the project area is the Petaluma Municipal Airport, which is approximately 6 miles northeast of the project area. The project area is not in the Petaluma Municipal Airport's safety zone area, the Airport Influence Area, nor is it within the airport's 65 CNEL noise contour (County of Sonoma 2020). Because the project area is not in a 65 CNEL or higher noise contour of any nearby airport, development facilitated by the project would not expose people residing or working in the project area to excessive noise levels. There would be no impact.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

No impact would occur.

4.10.4 Cumulative Impacts

The cumulative impact assessment area for noise is the area within and in the vicinity of the project area. This is an appropriate geographical area for this cumulative impact assessment because noise from future projects could attenuate over distance from beyond or originating within the project area. Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within approximately 500 feet from the construction site. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites.

Cumulative projects would develop a mix of land uses, such as commercial, office, and residential uses. Each of these uses would generate noise, such as HVAC equipment for buildings, noise from landscaping, and temporary noise during construction. Two or more reasonably foreseeable future projects located in proximity to each other and having overlapping construction schedules could contribute to noise levels exceeding City standards at nearby receptors. Therefore, unless construction of cumulative projects occur in proximity to each other and simultaneously, noise from individual construction projects have a small chance of combining to create significant cumulative impacts. However, to provide a conservative analysis, this cumulative noise impact is assumed to be potentially significant. Construction noise generated by development facilitated by the project would, without mitigation, substantially increase noise levels in the vicinity of specific future developments in the project area. Mitigation Measure N-1a would reduce noise from construction equipment from future projects or development facilitated by the project. Although mitigation measures would be implemented to the extent feasible, the potential remains for the project to make a cumulatively considerable contribution to cumulative construction noise impacts.

Development facilitated by the project would introduce new stationary noise sources to the ambient noise environment in the vicinity of the project area, including new mechanical ventilation equipment. These sources may combine with other nearby cumulative projects to result in higher noise levels. However, operational noise from these sources is localized and rapidly attenuates within an urbanized setting because of intervening structures and topography that block the line of sight and due to other noise sources closer to receptors that obscure project-related noise. Therefore, with implementation of Mitigation Measure N-1b, cumulative impacts related to operational noise would be less than significant.

Vehicle trips generated by cumulative projects would combine on roadways within the cumulative impacts assessment area. The addition of these trips would contribute to traffic or roadway noise. Table 4.10-10 summarizes the estimated cumulative plus project traffic noise increase based on ADT volumes (Appendix E). As shown in Table 4.10-10, based on the FHWA RD-77-108 traffic noise prediction model, the maximum increase in traffic noise would be 11.3 dBA L_{dn} under cumulative plus project conditions along Santero Way, south of East Cotati Avenue. This would exceed the significance threshold of 5 dBA L_{dn} identified in *Significance Thresholds*, discussed above. All other roadway segments would be under the City of Cotati's significance threshold of 1.5 dBA L_{dn} . As discussed under Impact NOI-1, even with implementation of Mitigation Measure N-1c, cumulative traffic noise impacts would remain significant and unavoidable.

The potential for significant construction groundborne vibration and noise impacts is within relatively close distances (e.g., within approximately 50 feet for a vibratory roller), even though there could be other cumulative projects simultaneously under construction near a development project facilitated by the project. Since no two construction cumulative projects would both be within 50 feet of a given sensitive structure, cumulative groundborne vibration impacts would be less than significant.

The project area is not in the Petaluma Municipal Airport's safety zone area, the Airport Influence Area, nor is it within the airport's 65 CNEL noise contour (County of Sonoma 2020). Because the project area is not in a 65 CNEL or higher noise contour of any nearby airport, development facilitated by the project would not expose people residing or working in the project area to excessive noise levels. There would be no cumulative impact.

4.11 Population and Housing

This section addresses potential population growth and displacement impacts associated with implementation of the proposed project. Data used to prepare this section was sourced from the Association of Bay Area Governments (ABAG), and the California Department of Finance (DOF).

4.11.1 Setting

a. Population

After its incorporation in 1963, Cotati's population grew exponentially during its early decades, from 1,368 to 3,346 residents from 1970 to 1980 and 3,420 to 5,625 residents from 1980 to 1990 (DOF 2024a, 2024b). In the 1990s the City's population growth slowed to 113 percent, reaching a population of 6,471 in 2000 (DOF 2024c). From there, the city continued to gradually increase in population with 112 percent growth from 2000 to 2010 and 103 percent growth from 2010 to 2020 reaching a population of 7,505 in 2020 (DOF 2024d, 2024e).

b. Households and Dwelling Units

A household is defined by the DOF as a group of people who occupy a housing unit. A household differs from a dwelling unit because the number of dwelling units includes both occupied and vacant dwelling units. Not all of the population lives in households. A portion lives in group quarters, such as board and care facilities, while others are homeless.

Small households, consisting of one to two persons per household, traditionally reside in units with zero to two bedrooms; and larger households of three to four persons per household normally reside in units with three to four bedrooms. Large households of five or more persons per household typically reside in units with four or more bedrooms. However, the number of units in relation to the household size may also reflect preference and economics. Many small households obtain larger units and some large households live in smaller units for economic reasons.

Development in Cotati is largely based on a neighborhood concept that promotes single and multi-family housing types near schools and/or parks. As of 2024, household size in Cotati is 2.34 persons per household (DOF 2024f). As shown in Table 4.11-1, there are 3,241 dwelling units in Cotati. These consist of 2,121 single family units and 1,001 multi-family units (DOF 2024f).

Table 4.11-1 Existing Cotati Population, Dwelling Units, and Employment and Projections

Cotati	2024	Projected in 2050	Change 2024 to 2050	Percent Change 2024 to 2050
Population	7,303	12,060 ¹	+4,757	65%
Dwelling Units	3,241	5,154 ²	+1,913	59%
Jobs	4,060 ³	5,122 ²	+1,062	26%

¹ Plan Bay Area 2050 (ABAG 2021) does not provide population projections; instead the 2050 dwelling unit projection was multiplied by 2.34 persons per household (DOF 2024f) to get the resulting 2050 population projection.

² Data from Plan Bay Area 2050 (ABAG 2021) was used for dwelling unit and jobs projections. Plan Bay Area 2050 groups the entire South Sonoma County region together. In order to provide Cotati’s data, a ratio was generated based on the DOF 2024 data comparing Cotati with the rest of the region. This proportion was then used to multiply into the 2050 South Sonoma County projections to get Cotati-specific growth projections. The total dwelling units for the South Sonoma County in 2024 was 52,193, of which Cotati had 3,241 dwelling units. Therefore, the City of Cotati contains approximately 6.21% of dwelling units in the South Sonoma County region. The 2050 dwelling unit projection is 83,000 for South Sonoma County (ABAG 2021); therefore, Cotati would have a projected growth of 5,154 dwelling units in 2050. Similar calculations for jobs were made based on available employment data. Total jobs in South Sonoma County amounted to 63,411, of which Cotati accounted for 4,060 jobs, or 6.4%. The Plan Bay Area 2050 (ABAG 2021) jobs projection is 80,000 for South Sonoma County. Thus, Cotati has a projected growth of 5,122 jobs.

³ Source: City of Cotati 2023. Note that the data provided in the Cotati Housing Element is from 2019 and is the most recent available data for the number of jobs in the city.

c. Growth Projections

Table 4.11-1 presents population, dwelling units, and employment projections through 2050 for Cotati. The projections suggest that the City’s population will grow approximately 65 percent between 2024 and 2050. This translates to an estimated 4,757 new residents by 2050. New dwelling units are expected to increase 59 percent between 2024 and 2050, for a total of 1,913 new units. Employment is projected to increase approximately 26 percent from 2019 levels, for a total of approximately 1,062 new jobs by 2050.

4.11.2 Regulatory Setting

a. State

State Housing Element Law

State housing element statutes (Government Code Sections 65580 through 65589.11) mandate that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. As a result, State housing policy rests largely upon the effective implementation of local general plans and, in particular, housing elements. Additionally, Government Code Section 65588 dictates that housing elements must be updated at least once every eight years. The City of Cotati maintains a Housing Element associated with the City’s General Plan, which is described below and addresses housing affordability, including Regional Housing Needs Assessment (RHNA) goals.

Housing Crisis Act of 2019

The Housing Crisis Act of 2019 (SB 330) seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and

uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The bill was amended on September 16, 2021 (SB 8) to extend key provisions of SB 330 from January 1, 2025, to January 1, 2030. Significant amendments include expanding the definition of “hearing” and clarifying the definitions of “housing development projects” and “affordable housing project.” SB 8 also modifies how existing dwelling units that will be replaced with a new project through the Housing Crisis Act are protected and how tenants must be offered relocation or assistance. In addition, SB 8 clarifies the Housing Crisis Act requirement of “no net loss in residential capacity” (Kronick 2021).

Relocation Assistance

Section 7261(a) of the California Government Code requires that programs or projects undertaken by a public entity must be planned in a manner that (1) recognizes, at an early stage in the planning of the programs or projects and before the commencement of any actions which will cause displacements, the problems associated with the displacement of individuals, families, businesses, and farm operations, and (2) provides for the resolution of these problems in order to minimize adverse impacts on displaced persons and to expedite program or project advancement and completion. The displacing agency must ensure the relocation assistance advisory services are made available to all persons displaced by the public entity. If the agency determines that any person occupying property immediately adjacent to the property where the displacing activity occurs is caused substantial economic injury as a result of the displacement, the agency may also make the advisory services available to that person.

AB 1763

AB 1763, effective January 1, 2020, amends the State Density Bonus Law (Section 65915) to allow for taller and denser 100 percent affordable housing developments, especially those near transit, through the creation of an enhanced affordable housing density bonus.

b. Regional

Plan Bay Area 2050

Cotati is located within the ABAG planning area. ABAG functions as the Metropolitan Planning Organization (MPO) for Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties, and is responsible for implementing the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is called Plan Bay Area 2050 (ABAG 2021). Plan Bay Area 2050 is a long-range integrated transportation and land-use/housing strategy for the San Francisco Bay Area through 2050.

Metropolitan Transportation Commission Transit-Oriented Communities Policy

Metropolitan Transportation Commission’s (MTC) Transit-Oriented Communities (TOC) Policy supports two strategies included in Plan Bay Area 2050: Strategy H3 (Allow a greater mix of housing densities and types in Growth Geographies) and Strategy EC4 (Allow greater commercial densities in Growth Geographies). TOC Policy goals help advance Plan Bay Area 2050, including (MTC 2024):

1. Increase the overall housing supply in part by increasing the density for new residential projects. Prioritize affordable housing in transit-rich areas.
2. In areas near regional transit hubs, increase density for businesses and commercial development.
3. Prioritize bus transit, active transportation and shared mobility (such as bike share and car share) within and to/from transit-rich areas, particularly to Equity Priority Communities located more than one half-mile from transit stops or stations.
4. Support and build partnerships to create equitable transit-oriented communities within the San Francisco Bay Area.

The TOC Policy itself states that the legislation would “support the region’s transit investments by creating communities around transit stations and along transit corridors that not only support transit ridership, but that are places where Bay Area residents of all abilities, income levels, and racial and ethnic backgrounds can live, work and access services, such as education, childcare, and healthcare. The TOC Policy is rooted in Plan Bay Area 2050, the region’s Long Range Transportation Plan/Sustainable Communities Strategy. The TOC Policy applies to areas within one half-mile of the following types of existing and planned fixed-guideway transit stops and stations: regional rail, commuter rail, light-rail transit, bus rapid transit, and ferries. The policy requirements consist of the following four elements: 1) minimum required and allowed residential and/or commercial office densities for new development; 2) policies focused on housing production, preservation and protection, and commercial anti-displacement and stabilization policies; 3) parking management; and 4) transit station access and circulation.” (MTC 2023)

Sonoma County Transportation Authority

The Sonoma County Transportation Authority (SCTA) serves as the coordinating and advocacy agency for transportation funding for Sonoma County. The SCTA acts as the countywide planning and programming agency for transportation related issues. The SCTA plays a leading role in transportation by securing funds, providing project oversight, and initiating long term planning. To comply with the Metropolitan Transportation Commission (MTC) requirement that local transportation agencies establish transportation plans that can feed into the larger RTP, SCTA prepared Moving Forward 2040 — the Comprehensive Transportation Plan in September 2016. The Comprehensive Transportation Plan uses ABAG and MTC as well as DOF and California Economic Development Department data to forecast future population, housing, and employment in Sonoma County and the cities therein through 2040.

c. Local

Cotati Housing Element

The Housing Element is one of the seven required elements of the General Plan. The purpose of the Housing Element is to identify and analyze existing and projected housing needs in order to preserve, improve, and develop housing for all economic segments of the community, consistent with the RHNA regulations described above. The City adopted its current Housing Element in 2023 as part of the 2023-2031 planning cycle. The City received certification of the Housing Element from HCD in June 2023.

4.11.3 Impact Analysis

a. Methodology and Thresholds of Significance

Population and housing trends in the county were evaluated by reviewing the most current data available from the DOF, Plan Bay Area 2050, and the City Housing Element. Impacts related to population are generally social or economic in nature. Under CEQA, a social or economic change generally is not considered a significant effect on the environment unless the changes are directly linked to a physical change (*CEQA Guidelines* Section 15131).

The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this EIR, impacts related to population and housing are considered significant if implementation of the proposed project would:

1. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

For purposes of this analysis, “substantial” population growth is defined as growth exceeding ABAG/MTC population forecasts for the City or exceeding the City’s identified population and housing needs. “Substantial” displacement would occur if allowed land uses would displace more residents than would be accommodated through growth provided by project implementation.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Impact POP-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD ACCOMMODATE ADDITIONAL RESIDENTS AND DWELLING UNITS BUT WOULD NOT EXCEED PLAN BAY AREA 2050 POPULATION AND HOUSING FORECASTS AND WOULD BE CONSISTENT WITH THE CITY’S HOUSING ELEMENT. THE PROJECT WOULD NOT RESULT IN UNPLANNED POPULATION GROWTH. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would result in the rezoning, land use designation change, and/or change to allowable development under the Santero Way Specific Plan (SWSP) to allow between 25 and 35 dwelling units per acre, and a floor area ratio (FAR) of at least 1.0 for commercial development. A total of 12 parcels would be rezoned and a total of 3 parcels would undergo a land use designation change as shown in Figure 2-3 and described in Section 2.5, *Project Characteristics*. As discussed in Section 2, *Project Description*, the project could accommodate an estimated net increase of 1,800 buildout population potential and 769 new dwelling units in the project area, which includes both the Santero Way Specific Plan Area and TOC parcels. Table 4.11-2 compares the population and housing buildout resulting from the project to population and housing forecasts estimated by ABAG and the City’s General Plan.

Table 4.11-2 Projected Population Growth

	ABAG Buildout Projections (2024 to 2050)¹	City's General Plan²	Project Increase in Buildout Potential
Population (# of residents)	4,757 ¹	3,775	1,800
Housing (# of dwelling units)	1,913	1,541	769

¹ Refer to Table 4.11-1.

² Source: City of Cotati 2014.

As shown in Table 4.11-2, the projected growth associated with the project would be within the ABAG and City General Plan housing projections. Furthermore, as the growth resulting from the project is anticipated and evaluated throughout this EIR, the population growth resulting from the project would not be unplanned. Additionally, the increase in housing and population from development facilitated by the project would be within housing need estimates. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation is required.

Significance after Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?
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Impact POP-2 DEVELOPMENT FACILITATED BY THE PROJECT COULD DISPLACE EXISTING HOUSING OR PEOPLE, NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE. HOWEVER, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Two parcels within the project area contain existing housing (a total of two existing residential units) or other structures (commercial structures on the majority of the TOC parcels) that could be removed during project implementation. However, the proposed project would enable development in the project area which would result in a net increase of 769 dwelling units and 651,365 square feet of commercial development. One of the fundamental project objectives is to increase the capacity for housing in the project area by modifying General Plan designations and rezoning. The project would increase the total buildout potential of the identified rezoning sites, thus providing areas for the development of new housing projects consistent with the new zoning designation of these sites. Such a change in zoning to allow for higher density housing could result in the demolition of existing housing, but this would only occur when new housing projects are proposed for that site, and the total number of units on the site would increase. Furthermore, AB 1482 requires relocation assistance payments to tenants renting a “covered” rental unit. Thus, although two residences may be removed as part of redevelopment on those sites, this loss would be substantially offset by the total number of units added as a result of project implementation. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.11.4 Cumulative Impacts

The geographic scope for cumulative population and housing impacts is the City of Cotati and surrounding areas. This geographic scope is appropriate for population and housing because projections at this level are used to estimate the need for public services and other government facilities and programs. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact population and housing.

Cumulative development would be required to adhere to applicable zoning and development regulations and General Plan policies to mitigate environmental impacts where feasible and would undergo environmental review, including consideration of whether the projects would induce unplanned population growth. With these considerations prior to project approval, cumulative impacts related to growth inducement would be less than significant.

Cumulative development would be required to undergo environmental review, including consideration of whether the projects would displace people or residences. In the event that people or residences are displaced, AB 1482 would apply, as mentioned in Impact POP-2. With these considerations prior to project approval, cumulative impacts related to the displacement of people or residences would be less than significant.

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4.12 Public Services and Recreation

This section assesses potential impacts to public services, including fire and police protection, public schools, and other public facilities including parks from the proposed project. Impacts to water and wastewater infrastructure and solid waste collection and disposal are discussed in Section 4.15, *Utilities and Service Systems*.

4.12.1 Setting

a. Fire Services

The Rancho Adobe Fire Protection District (RAFPD) is responsible for protecting life and property in the Cotati area. The RAFPD currently serves 28,000 residents. The RAFPD has 13 full-time firefighters, engineers, and captains; 3 battalion chiefs; 24 part-time firefighters; a part-time fire chief; and an administrative manager (RAFPD 2024a). The City has an emergency operations plan to protect public safety and plan for continuity of city services during a disaster. The District does not have specific target response times but aims for a standard response time of approximately 3 to 5 minutes (RAFPD 2020a).

The District maintains three fire stations, of which, Station 1 is closest to the project area:

- Station 1: 1 East Cotati Avenue, Cotati
- Station 2: 11000 Main Street, Penngrove
- Station 3: 99 Liberty School Road, Petaluma

RAFPD has also entered into a Mutual and Automatic Aid Agreement with neighboring agencies, including the Sonoma County Fire Department, and the Rohnert Park Department of Public Safety (RAFPD 2020)

b. Police Services

The Cotati Police Department provides police services in the City of Cotati. Acting as both a public service entity and an informational resource, the department is dedicated to upholding legal mandates and court orders, channeling efforts to sustain the health, welfare, and safety of Cotati's residents and visitors. The Police Department operates around the clock, providing services such as dispatch, patrol, traffic enforcement, investigations, and community policing. The Cotati Police Department currently has 13 sworn officers (full time equivalent staff) with the agency.

c. Schools

The Cotati-Rohnert Park Unified School District (CRPUSD) serves the City of Cotati. The district includes six elementary schools, two middle schools, three high schools, and a K-8 academy (CRPUSD 2024). Residents within the project area would attend University Elementary School, Technology Middle School, and Technology High School. The district served 6,449 students in the 2022-2023 school year (Ed-Data 2024a). The current and projected enrollment at University Elementary School, Technology Middle School, and Technology High School are shown in Table 4.12-1.

Table 4.12-1 CRPUSD Schools Serving the Project Area

School	Current Enrollment (2022-23)	Projected Enrollment (2032-33) ¹	Projected Change in Enrollment (from 2022-23 to 2032-33) ¹
University Elementary School	239	203	-36
Technology Middle School	468	396	-71
Technology High School	335	284	-51
Total	1,042	883	-158

¹ Projected enrollment was calculated assuming a 15.1 percent decrease in enrollment between 2021-22 (64,375 total students) and 2032-33 (54,623 total students) in Sonoma County (California Department of Finance [DOF] 2024), as compared to actual enrollment numbers in the CRPUSD (Ed-data 2024a, 2024b, 2024c, 2024d). The actual change in projected enrollment for each district may vary. Data from the DOF was provided at the County level and not at the School District level.

d. Parks and Recreation

The City’s Public Works and Engineering Department provides park maintenance services to the City’s parks and special use areas that would be used by future residents. The Cotati Municipal Code sets a goal of one acre of recreational area per 200 residents, or five acres per 1,000 residents. Cotati currently provides 3.33 acres of park lands per 1,000 residents (24.2 acres per 7,303 residents) (City of Cotati 2013, 2024; DOF 2024). The park closest to the project area is Sunflower Park, located just east of Santero Way with access off of East Cotati Avenue. Other close recreation facilities include Kotate Park (located southeast of the Lasalle Avenue and Lincoln Avenue intersection, near TOC parcels fronting East Cotati Avenue), La Plaza Park (located approximately 0.4 mile west of the nearest TOC parcel), and Delano Park (located approximately 0.5 mile west of the nearest TOC parcel). The nearest hiking trail to the project area is the Laguna de Santa Rosa Trail (0.2 miles west of the nearest TOC parcel), which is under the jurisdiction of the Sonoma County Regional Parks. A summary of the City’s recreational facilities is provided below:

Park	Acreage	Location
Civic Center/Cader Field	3.3	East School Street & West Sierra Avenue
Delano	1.0	Valparaiso Avenue & Page Street
Draper	1.5	Wilford Avenue
Falletti	1.4	Gravenstein Way & Village Court
Kotate	2.3	LaSalle & Lincoln Avenues
La Plaza	2.2	Old Redwood Highway and West Sierra Avenue
Putnam Park	8.3	Myrtle Avenue
Sunflower	1.7	East Cotati Avenue & Sunflower Drive
Veteran’s Memorial Park	2.0	Park Avenue & Old Redwood Highway
Pocket Park	0.1	LaSalle Avenue & the Laguna de Santa Rosa
Santero Park	0.4	Santero Way
Total	24.2	

Source: City of Cotati 2013, 2024

Because the City of Rohnert Park is so close to the project area, future residents would likely use parks in Rohnert Park as well as those in Cotati. The parks managed by the City of Rohnert Park that are closest to the project area include Caterpillar Park (3.0 acres) and Rainbow Park (2.8 acres).

e. Public Libraries

Sonoma County Library is a Joint Powers Authority that operates libraries that serve the City of Cotati. There are 14 regional libraries: Central Santa Rosa Library, Cloverdale Regional Library, Forestville Community Library, Guerneville Regional Library, Healdsburg Regional Library, Northwest Santa Rosa Library, Occidental Community Library, Petaluma Regional Library, Rincon Valley Regional Library, Rohnert Park Cotati Regional Library, Roseland Regional Library, Sebastopol Regional Library, Sonoma Valley Regional Library, and Windsor Regional Library. The Rohnert Park Cotati Regional Library is located approximately 1.4 miles north of the project area. The mission of Sonoma County Library is to bring information, ideas, and people together to build a stronger community (Sonoma County Library 2024).

4.12.2 Regulatory Setting

a. State

California Fire and Building Code

The State of California provides minimum standards for building design through the California Building Code (CBC), which is located in Part 2 of Title 24, California Building Standards Code, of the CCR. The CBC is based on the International Building Code but has been amended for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local building officials for compliance with the CBC. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services, including police services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Agencies are required to use Proposition 172 to supplement their local funds for police, as well as other public safety services. Section 35 at subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.”

California Code of Regulations

The California Code of Regulations, Title 5 Education Code, governs all aspects of education in the State, and allows school districts to prepare developer fees. The School Facilities Act of 1986 (Assembly Bill [AB] 2926) was enacted and added to the California Government Code (Section 65995) in 1986. It authorizes school districts to collect development fees, based on demonstrated need, and generate revenue for school districts for capital acquisitions and improvements. It also established maximum fees which may be collected under this and any other school fee authorization. AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the Government code. Under this statute, payment of statutory fees

by developers serves as total mitigation under CEQA to satisfy the impact of development on school facilities.

California Senate Bill 50

As part of the further refinement of the legislation enacted under AB 2926, the passage of SB 50 in 1998 defined the Needs Analysis process in government Code Sections 65995.5-65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. SB 50 generally provides for a 50/50 State and local school facilities match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available; whether the school district is eligible for State funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

California Government Code sections 65995-65998 sets forth provisions to implement SB 50. Specifically, in accordance with section 65995(h), the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities.” The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Pursuant to Government Code section 65995(i), “A State or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in section 56021 or 56073 on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized pursuant to this section or pursuant to section 65995.5 or 65995.7, as applicable.”

California Education Code section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

Quimby Act (California Government Code Section 66477)

The Quimby Act was established by the California Legislature in 1965 to provide parks for growing communities in California. The Act authorizes cities to adopt ordinances addressing park land and/or fees for residential subdivisions for the purpose of providing and preserving open space and recreational facilities and improvements. The Act requires the provision of 3 acres of park area per 1,000 persons residing in a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case the county or city may adopt a higher standard not to exceed 5 acres per 1,000 residents. The Act also specifies acceptable uses and expenditures of such funds. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities.

b. Local

Sonoma County Multijurisdictional Hazard Mitigation Plan

The City has partnered with Sonoma County and other local governments on the 2021 Multijurisdictional Hazard Mitigation Plan. The mitigation goals and priorities of the Multijurisdictional Hazard Mitigation Plan are to increase the level of preparation for potential disasters and to minimize the impacts associated with natural and man-made hazards; identify strategies and tools to facilitate community disaster and hazards awareness and education; provide for the safety of County and City residents by maintaining efficient, well-trained, and adequately equipped personnel; encourage a disaster-resistant County, City, and surrounding area by reducing the potential for loss of life, property damage, and environmental degradation from disasters and hazards; reduce the vulnerability of public and private facilities and infrastructure to the effects of earthquakes, flooding, and drought; and promote conditions and strategies that will accelerate the capacity for physical and economic recovery from disasters and hazards (County of Sonoma 2021). The RAFPD and Cotati Police Department are designated to respond to hazards and emergencies in the City of Cotati.

Cotati Municipal Code

Chapter 17.76.030, Park land and dedication fees, of the Cotati Municipal Code, requires the dedication of land and/or the payment of fees to the city for park and recreational purposes as a condition of approval as authorized by the Quimby Act.

Cotati General Plan

The Cotati General Plan contains the following goals and policies in the Community Services and Facilities Element that are relevant to public services and recreation.

Goal CSF 1: Provide High Quality Public Services and Facilities to All Residents, Businesses, and Visitors in Cotati

Objective CSF 1A: Ensure that New Growth and Development do not Exceed the City's Ability to Provide Necessary Public Services and do not Overburden Existing Public Services and Facilities

Policy CSF 1.1: Require all development projects to demonstrate, to the satisfaction of the City Engineer, that the City's public services and utilities can accommodate the increased demand for services associated with the project.

Policy CSF 1.2: Require new development to offset or mitigate impacts to public services and facilities to ensure that service levels for existing users are not degraded or impaired by new development, to the satisfaction of the City Engineer.

Policy CSF 1.4: Maintain development fees at a sufficient level to finance infrastructure costs.

Goal CSF 2: Ensure That Adequate Water, Wastewater, Fire, and Police Services Are Available to Serve Existing Land Uses and Areas of Planned Growth, as Identified in the General Plan Land Use Map

Objective CSF 2C: Maintain High Quality Fire Protection and Police Services

Policy CSF 2.28: Encourage the Rancho Adobe Fire Protection District to maintain adequate staff and equipment to provide fire protection services to existing and planned population growth in Cotati.

Policy CSF 2.29: Encourage the Rancho Adobe Fire Protection District to maintain an adequate response time for emergency vehicles.

Policy CSF 2.31: Ensure that new development is designed, constructed, and equipped consistent with the requirements of the California Fire Code in order to minimize the risk of fire.

Policy CSF 2.33: Ensure that the Police Department has adequate staff and equipment to accommodate existing and planned population growth in Cotati.

Policy CSF 2.36: Continue to promote coordination between land use planning and police and fire protection services through consultation and coordination with the Cotati Police Department and the Rancho Adobe Fire Protection District during the review of new development proposals.

Goal CSF 4: Enhance the Quality of Life for All City Residents Through the Provision of Cultural and Social Resources Including Quality Schools, Libraries, and Museums

Objective CSF 4A: Work with the Cotati/Rohnert Park Unified School District to Provide Quality Education for the Youth of Cotati

Objective CSF 4C: Support County Efforts to Provide Library Services that Meet the Evolving Educational and Social Needs of Cotati Residents.

The General Plan Open Space Element includes the following goals and policies related to the provision of park services:

Goal OS 2: Provide a High Quality Park and Recreation Network That Serves All Segments of Cotati's Population

Objective OS 2A: Maintain and Expand the Park and Recreation Network

Policy OS 2.5: Work aggressively to achieve and maintain a park standard of a minimum of one acre per 200 residents in order to meet the City's recreation needs.

4.12.3 Impact Analysis

a. Significance Thresholds and Methodology

According to Appendix G of the *CEQA Guidelines*, impacts related to public services and recreation from implementation of the proposed project would be significant if it would:

1. 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 objectives for any of the public services:
 - a. Fire protection;
 - b. Police protection;
 - c. Schools;

- d. Parks; or
 - e. Other public facilities.
2. 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; and/or
 3. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

In terms of Threshold 1e regarding impacts on “other public facilities,” such facilities include libraries and other public utility infrastructure. Impacts related to libraries are discussed in this section under Impact PS-5. Impacts related to public utility infrastructure, such as stormwater, wastewater, water, and solid waste facilities are addressed in Section 4.10, *Hydrology and Water Quality*, and Section 4.18, *Utilities and Service Systems*.

b. Project Impacts and Mitigation Measures

Threshold 1a: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED FIRE FACILITIES TO MAINTAIN ACCEPTABLE SERVICE RATIOS AND RESPONSE TIMES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 2, *Project Description*, development facilitated by the project would result in additional residential units, commercial space, and residents in the project area. Development facilitated by the project would be required to comply with existing laws and regulations regarding fire safety. The following requirements would be applicable to future development in the project area:

1. Compliance with the California Fire and Building Code, which applies to construction, equipment, use and occupancy, location, and maintenance of proposed buildings and includes regulations for vegetation and fuel management.
2. Compliance with Cotati Municipal Code’s adoption of the California Fire Code and California Code of Regulations Title 14 for defensible space regulations.
3. Cotati General Plan Policies pertaining to fire prevention and response.

Physical changes resulting from project implementation may include development of higher-density housing and first-floor commercial uses in the project area, with new structures and infrastructure constructed to the latest fire and building code safety standards. The increase in population and residential development would generate additional demand for fire protection and emergency services. The District currently serves approximately 28,000 people and the project would increase the number of residents in the project area by 1,800 people. With 42 staff in the District and a current service ratio of 1.5 staff per 1,000 residents, the proposed project would decrease the service ratio to 1.41 staff per 1,000 residents (RAFPD 2024a). In order to maintain the current service ratio of 1.5 staff per 1,000 residents, at least 2 additional staff would be necessary. This

small number of new staff would not require a new station to be constructed or the expansion of an existing station to accommodate the additional staff.

The project area is within 1.2 miles of the RAFFD Station 1 on East Cotati Avenue, and emergencies in the project area would be responded to within the response time goals due to the close proximity of the project area. Additionally, the project would increase the total population served by the District by approximately 6.4 percent. Development of the project area would not involve the construction of barriers to movement that could prevent RAFFD from meeting these response time goals. Furthermore, Cotati General Plan Action CSF 2p states that as part of the development review process for new projects, the City will continue to refer applications to RAFFD for determination of the project's potential impacts on fire protection services and requirements deemed necessary by RAFFD would be added as Conditions of Approval to the project's approving resolutions.

Therefore, while the project would generate additional demand, it would not substantially reduce existing response times or require the construction of new or altered fire stations and development facilitated by the project would be required to comply with existing regulations regarding fire safety. Furthermore, any future construction of a new fire station or expansion of an existing station serving the project area would be subject to CEQA review at the time a site is identified and a specific design proposed. Therefore, impacts related to the provision of fire services would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1b: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED POLICE FACILITIES TO MAINTAIN ACCEPTABLE SERVICE RATIOS. IMPACTS WOULD BE LESS THAN LESS THAN SIGNIFICANT.

Development facilitated by the project would increase the population in the project area, with associated increases in activity and public presence in the project area. This increase in activity may deter some crime, as the presence of more people can deter criminal activity. As for police protection services, the increase in population generated by the project would contribute to greater police service demands. Development facilitated by the project would be designed and constructed to meet all applicable current state and local codes and ordinances related to police protection such as California Constitution Article XIII, Section 35 and Cotati General Plan policies related to police protection.

The Cotati Police Department currently has a ratio of 1.78 officers for every 1,000 residents (Callen 2024). Development facilitated by the project would result in up to 769 new housing units and an estimated 1,800 new residents in the city. The proposed project would result in a ratio of 1.19

officers per 1,000 residents. Approximately three additional officers may be required to maintain the service level currently serving the project area, but would not warrant the construction of a new facility. Therefore, development facilitated by the project would not require the construction of a new police station. Cotati General Plan Action CSF 2q states that as part of the development review process for new projects, the City will continue to refer applications to the Cotati Police Department for determination of the project’s potential impacts on police protection services. Furthermore, any future construction of a new police station or expansion of an existing station serving the project area would be subject to CEQA review at the time a site is identified and a specific design proposed. Development facilitated by the project would result a less than significant impact on police facilities.

Mitigation Measure

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1c: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Impact PS-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED SCHOOL FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Students residing in the project area would attend University Elementary School, Technology Middle School, and Technology High School in the CRPUSD. Table 4.12-2 summarizes the projected increase in students from development facilitated by the project at each of these schools.

Table 4.12-2 Project Student Generation

School	Student Generation Rate ¹	Number of New Students
University Elementary School	0.039	30
Technology Middle School	0.026	20
Technology High School	0.028	22
Total	0.093	72

¹ Source: CRPUSD 2022, multi-family student generation rate.

² Projected enrollment was calculated assuming a 15.1 percent decrease in enrollment between 2021-22 (64,375 total students) and 2032-33 (54,623 total students) in Sonoma County (California Department of Finance [DOF] 2024), as compared to actual enrollment numbers in the CRPUSD (Ed-data 2024a, 2024b, 2024c, 2024d). The actual change in projected enrollment for each district may vary. Data from the DOF was provided at the County level and not at the School District level.

As shown in Table 4.12-2, based on school-age population statistics and CRPUSD student generation rates, development facilitated by the project would generate approximately 72 school-aged children in the CRPUSD, including 30 elementary school students, 20 middle school students, and 22 high school students. Students associated with development facilitated by the project would attend University Elementary School, Technology Middle School, and Technology High School.

Sonoma County school enrollment is anticipated to decline by 15.1 percent between 2022-23 and 2032-2033. Based on the projected combined decline in enrollment of 158 students at University Elementary School, Technology Middle School, and Technology High School, and the anticipated increase of 72 students that would result from development facilitated by the project, the CRPUSD would be able to absorb new and incoming students without needing to increase the capacity of existing schools or constructing new schools.

Therefore, the increased demand for school services facilitated by the project would not exceed the anticipated enrollment decrease within the project area, and schools would be able to absorb new students generated as a result of the project buildout. Furthermore, the CRPUSD require the payment of developer fees to fund future reconstruction and upgrades of school facilities. Future individual development projects would be required to pay these school facility developer fees during the project approval process. Pursuant to Government Code Section 65997, payment of school fees by development constitutes adequate CEQA mitigation. Furthermore, any future construction of a new or expanded school facility would be subject to CEQA review at the time a site is identified and a specific design proposed. Impacts to schools are considered less than significant without mitigation.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1d:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
Threshold 2:	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?
Threshold 3:	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?

Impact PS-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED PARKS, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, TO MAINTAIN ACCEPTABLE SERVICE RATIOS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Future residents of development facilitated by the project would be anticipated to use Sunflower, Kotate, La Plaza, and Delano parks. Residents in the project area would also use hiking trails in the City and may use parks in Rohnert Park due to the proximity to the project area.

As described in Section 4.13.1(d), the City aims to provide 5 acres of parkland per 1,000 residents. With a current population of 7,303, the proposed project would result in an increase of 1,800 residents. The City currently provides 24.2 acres of park land, for a ratio of 3.33 acres of parks per

1,000 residents. With full buildout of development facilitated by the project, the City's parkland ratio would decrease to 2.67 acres per 1,000 residents, which is below the City's target. Cotati Municipal Code Section 17.76.030 requires individual development projects to either provide an on-site parkland dedication or the payment of park in lieu fees. Compliance with this requirement would ensure that additional parkland is provided to future residents in the city, in order to maintain the existing parkland ratio. In addition, the City receives funding for parks and recreation through its General Fund, grants, shared use agreements, and Quimby fees (City of Cotati 2013). The project would not require construction of new parks or recreational facilities. Furthermore, any future construction of new or expanded parks and recreation facilities in the city would be subject to CEQA review at the time a site is identified and a specific design proposed. Impacts would therefore be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1e: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED LIBRARY FACILITIES TO MAINTAIN ACCEPTABLE SERVICE OBJECTIVES AS NEW DEVELOPMENT WOULD BE CONSIDERED INFILL. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The City of Cotati is served the Sonoma County Library, which currently serves 500,000 County residents. Development facilitated by the project would introduce approximately 1,800 new residents, which would be expected to proportionally increase library utilization. These additional potential registrants would visit the Rohnert Park-Cotati Regional Library, check out items, and participate in library events; however, such increased demand for library services would not necessarily compel the construction of a new or expanded library facility in the city. In addition, new residents would be able to visit other library locations throughout the county.

The proposed project facilitates infill development within areas of Cotati that are currently developed. The demand generated by new residents from infill development is likely to be accommodated by the existing library system, which already serves the surrounding community. Additionally, the proposed project focuses on higher-density, transit-oriented growth, which emphasizes efficient use of available resources rather than stretching them across new, sprawling areas. Because adequate existing facilities are available, development facilitated by the project would not require construction of new or expanded library facilities. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.12.4 Cumulative Impacts

Fire Protection

The geographic scope for cumulative fire protection impacts is the service area of the RAFPD. This geographic scope is appropriate because development facilitated by the project will increase the demand on this department. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact fire protection facilities.

For this analysis, a cumulative impact would occur if growth in the service area requires physical expansion of facilities such as construction of new fire facilities that would result in adverse physical impacts. Fire protection services are maintained and expanded through property taxes and collection of fees that grow incrementally as development occurs within a service area. New or expanded fire protection facilities may be required to serve cumulative development in the RAFPD service area; however, the RAFPD has not identified the need for specific new fire protection facilities in order to serve new development (RAFPD 2020b). Therefore, cumulative impacts related to adverse physical impacts from new or physically altered fire protection services would be less than significant.

Police Protection

The geographic scope for cumulative police protection impacts is the Cotati Police Department service area, which includes the project area. This geographic scope is appropriate because development facilitated by the project will increase the demand from the Cotati Police Department. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact police facilities.

Cumulative impacts would occur if growth within the service area requires the construction of a new or the expansion of an existing police station that would result in significant adverse physical impacts. New or expanded police facilities may be required to serve cumulative development in the county; however, the Cotati Police Department has not identified the need for new police facilities in order to serve new development (Cotati Police Department 2024). Therefore, cumulative impacts related to adverse physical impacts from new or physically altered police services would be less than significant.

Schools

The geographic scope for cumulative school impacts is the CRPUSD boundaries. This geographic scope is appropriate because development facilitated by the project will increase the demand on CRPUSD services and facilities. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact schools.

Cumulative impacts would occur if growth within a district would result in significant adverse physical impacts with the provisions for, or the need for, new or physically altered school facilities.

Cumulative projects would increase enrollment in the districts; however, all districts in the county, including CRPUSD, are anticipating a decline in student enrollment through the 2032-33 school year, and would therefore be able to absorb new and incoming students from cumulative projects. Additionally, pursuant to Government Code Section 65997, payment of school fees by development constitutes adequate CEQA mitigation. Because CRPUSD has adequate capacity to serve cumulative development in its service area, cumulative impacts would be less than significant, and the project would not result in a considerable contribution to cumulative impacts related to schools.

Libraries

The geographic scope for cumulative library impacts is the Sonoma County Library service area. This geographic scope is appropriate because development facilitated by the project would increase the demand on library services. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact libraries.

Cumulative impacts could occur if growth within the system requires the construction of new or the expansion of an existing library that would result in adverse physical impacts. Cumulative population growth, including the proposed project, would increase the demand for new libraries. However, cumulative projects are expected to increase demand on existing library facilities. Sonoma County Library has identified the Rohnert Park-Cotati Regional Library as in need of renovations; however, no new branch in this location was determined to be necessary (Sonoma County Library 2023). Because new or expanded facilities would not be required, cumulative impacts would be less than significant.

Parks

The geographic scope for cumulative parks and recreation impacts is parks and recreational areas within 10 miles of the project area. This geographic scope is appropriate because new residents in the project area would use parks and recreational facilities nearby and hiking trails throughout the county. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact parks and recreation facilities.

Cumulative impacts to parks and recreational facilities would occur if development, and related population growth, in the area increases the use of existing facilities such that substantial physical deterioration of those facilities would occur, or if new facilities would need to be constructed or existing facilities expanded that would have an adverse effect on the environment. Cumulative development would result in an increase in the use of existing recreational facilities; however, funding through applicable General Funds, grants, shared use agreements, and Quimby fees, would support the maintenance of park facilities. Therefore, cumulative impacts related to new or expanded park and recreation facilities, or the physical deterioration of existing park and recreation facilities, would be less than significant.

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4.13 Transportation

This section evaluates potential impacts on the local and regional circulation system that would result from implementation of the proposed project. This includes an analysis of the potential for the proposed project to conflict with existing programs, plans, ordinances, or policies addressing the circulation system; conflict with *CEQA Guidelines* Section 15064.3(b); increase hazards due to geometric design features; or result in inadequate emergency access.

4.13.1 Setting

a. State Highways

Highway 101 is the primary route connecting the City of Cotati to the San Francisco Bay Area to the south, and Santa Rosa and Mendocino County to the north. Within Cotati, Highway 101 is a six-lane freeway and has an interchange with State Route (SR) 116, which extends northwest toward Sebastopol. The left lanes in each direction of Highway 101 are carpool lanes, whereby only vehicles with two or more occupants may use the lanes in the weekday morning and weekday afternoon peak periods of travel.

b. Local Roadways

East Cotati Avenue is the primary roadway within the project area vicinity and features two lanes in each direction with a median turning lane. It includes designated bike lanes and sidewalks on both sides. It serves as a major collector roadway, facilitating and connecting local traffic to central Cotati to the west and nearby Sonoma State University to the east.

Santero Way is a one-way-in, one-way-out cul-de-sac. It runs north/south through the Santero Way Specific Plan (SWSP) area and consists of two unmarked lanes, one in each direction. Santero Way offers discontinuous sidewalks and parallel parking on both shoulders. The roadway dead-ends at a cul-de-sac and lacks designated bike lanes. This local residential street primarily serves neighborhood traffic.

Depot Way is an unfinished roadway which runs through a portion of the center of the SWSP area. A portion of it is paved just south of the existing Cotati Sonoma-Marin Area Rail Transit (SMART) Station parking lot, but transitions to an unpaved, dirt roadway for the remainder. It functions as a driveway for parking lot access and an unofficial roadway for vehicles to egress onto Santero Way.

c. Pedestrian and Bicycle Infrastructure

The City of Cotati has a network of bicycle and pedestrian infrastructure designed to enhance mobility within the community. Sidewalks are available along many roadways, providing designated pathways for pedestrians. Within the project area, specifically along East Cotati Avenue, there are marked bike lanes.

The city also includes trail systems that connect various parks and recreational areas, promoting outdoor activities. Directly east of the SWSP area is the SMART Trail which provides first and last-mile connections to SMART Rail Stations and offers a dedicated facility for people to walk, bike, and roll safely within and between communities. To date, SMART along with partner agencies have constructed over 28 miles of pathway, of which approximately 21 miles are Class I SMART Pathway/Great Redwood Trail within and along the railroad right-of-way (SMART 2024a). A portion

of the SMART Trail which includes a Class I off-street multi-use pathway is located parallel to the SWSP area.

d. Transit Service

The City of Cotati is currently served by bus and passenger rail transit routes. Bus stops for local transit services are spread throughout the city, with intercity bus services serving park-and-ride lots near Highway 101. SMART passenger rail serves the project area via the Cotati SMART Station along East Cotati Avenue along the eastern project boundary. The city is also served by paratransit, which complements the other transit services.

Sonoma County Transit

Sonoma County Transit (SCT) is the primary regional transit provider in Sonoma County. SCT provides local transit services in the City of Cotati along with services to the City of Santa Rosa and other areas of Sonoma County. SCT Route 44 runs along East Cotati Avenue, north of the project area, with Route 48 providing service along East Cotati Avenue to areas just west of the project area. SCT routes within the project are somewhat circuitous and have infrequent service (i.e., long headways of 30 minutes or more) but run Monday through Sunday. SCT Route 10 also runs along East Cotati Avenue and operates Monday through Saturday. It includes frequent service for stops throughout Cotati. Additionally, SCT Route 26 runs on weekdays from Sebastopol to Cotati, stopping at the bus stop within the northern portion of the SWSP area on East Cotati Avenue.

Sonoma-Marin Area Rail Transit (SMART)

SMART is a commuter rail line serving Sonoma and Marin Counties. The existing SMART line runs from a station near the Sonoma County Airport to the Larkspur Ferry Terminal. A northerly extension of the SMART line to Cloverdale (via Windsor and Healdsburg) is planned in the future. The Cotati SMART Station is located within the SWSP area. Weekday service historically operated at 30 to 90 minute intervals with service focused on the peak periods and direction of commute travel; weekend service has also historically been provided on both Saturdays and Sundays. SMART has announced plans to reduce weekday headways when additional train sets and funding becomes available, thus closing gaps in the schedule and improving the viability of the service for medium- and long-distance commute trips (SMART 2024a).

The SMART passenger rail service currently runs from the Sonoma County Airport station in the north to the Larkspur Ferry Terminal in the south. The Cotati SMART Station is currently served by 19 weekday southbound trips and 19 weekday northbound trips; weekday service is provided from 5:01 AM to 9:43 PM. On weekends, the Cotati SMART station is served by eight southbound trips and nine northbound trips, with weekend service being provided from 7:38 AM to 8:24 PM.

e. Railways

There is one rail line that serves the City of Cotati – the SMART rail line through the eastern part of the city, adjacent to and partially within the SWSP area. The rail line provides both passenger service and freight services. Passenger and freight rail services are overseen by the SMART agency (SMART 2024b). While few freight customers exist within the City of Cotati today, freight-by-rail service allows for the removal of truck trips from the city street system and may be a more environmentally efficient way of moving goods in the future between Sonoma County and the rest of the country.

4.13.2 Regulatory Setting

a. Federal Regulations

Federal Highway Administration

The Federal Highway Administration (FHWA) is the agency of the United States Department of Transportation responsible for the Federally funded roadway system, including the interstate highway network and portions of the primary State highway network. FHWA funding is provided through the Fixing America's Surface Transportation Act. Federal funds can be used to fund eligible local transportation improvements in such as projects to improve the efficiency of existing roadways, traffic signal coordination, bikeways, pedestrian facilities, and transit system upgrades.

b. State Regulations

Vehicle Miles Traveled (Senate Bill 743)

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior rules treated automobile delay and congestion as an environmental impact. Whereas SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reducing greenhouse gas emissions. In December 2018, Office of Planning and Research (OPR) released an update to *CEQA Guidelines* consistent with SB 743, which recommend using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The *CEQA Guidelines* required all jurisdictions in California to begin using VMT-based thresholds of significance no later than July 1, 2020.

At the same time as the release of the updated *CEQA Guidelines*, OPR also released a non-binding *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which outlines potential VMT analysis methodologies and thresholds of significance for use by agencies in California based on substantial evidence developed by OPR related to achievement of the State's greenhouse gas emissions reductions targets (OPR 2018).

Greenhouse Gas Emission Reductions from Transportation Sources (Senate Bill 32 and Senate Bill 375)

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 (the other provisions of Assembly Bill [AB] 32 remain unchanged). SB 32 establishes a state-wide GHG reduction goal, which agencies must achieve by implementing policies that reduce VMT. On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation.

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed in August 2008, enhances the state's ability to reach greenhouse gas emissions goals by directing the California Air

Resources Board to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 directly links regional land use and transportation planning with VMT reduction. By aligning these two areas, the law encourages development patterns that minimize the need for long commutes and automobile dependence, helping to cut VMT and, consequently, transportation-related emissions. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations.

Safety Elements (Assembly Bill 747 and Senate Bill 99)

AB 747 (2019) requires that the safety element be reviewed and updated to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. This is a requirement for all safety elements or updates to hazard mitigation plans completed after January 2022.

SB 99 (2019) requires review and update of the safety element to include information to identify residential developments in hazard areas that do not have at least two emergency evacuation routes. In essence, this legislation assists in identifying neighborhoods and households within a hazard area that have limited accessibility. This is intended to assist agencies with identifying opportunities to improve connectivity and evacuation capacity.

Caltrans Deputy Directive 64-R1: Complete Streets – Integrating the Transportation System

In 2001, Caltrans adopted Deputy Directive 64; a policy directive related to non-motorized travel throughout the State. In October 2008, Deputy Directive 64 was strengthened to reflect changing priorities and challenges. Deputy Directive 64-R1 states:

The Department views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Providing safe mobility for all users, including motorists, bicyclists, pedestrians and transit riders, contributes to the Department's mission/vision: "Improving Mobility across California."

Successful long-term implementation of this directive is intended to result in more options for people to go from one place to another, less traffic congestion and greenhouse gas emissions, more walkable communities (with healthier, more active people), and fewer barriers for older adults, children, and people with disabilities.

Director's Policy 22: Director's Policy on Context Sensitive Solutions

Director's Policy 22, a policy regarding the use of "Context Sensitive Solutions" on all State highways, was adopted by Caltrans in November of 2001. The policy reads:

The Department uses "Context Sensitive Solutions" as an approach to plan, design, construct, maintain, and operate its transportation system. These solutions use innovative and inclusive approaches that integrate and balance community, aesthetic, historic, and environmental values with transportation safety, maintenance, and performance goals. Context sensitive solutions are reached through a collaborative, interdisciplinary approach involving all stakeholders.

The context of all projects and activities is a key factor in reaching decisions. It is considered for all State transportation and support facilities when defining, developing, and evaluating options. When considering the context, issues such as funding feasibility, maintenance feasibility, traffic demand, impact on alternate routes, impact on safety, and relevant laws, rules, and regulations must be addressed.

The policy recognizes that “in towns and cities across California, the State highway may be the only through street or may function as a local street,” that “these communities desire that their main street be an economic, social, and cultural asset as well as provide for the safe and efficient movement of people and goods,” and that “communities want transportation projects to provide opportunities for enhanced non-motorized travel and visual quality.” The policy acknowledges that addressing these needs will assure that transportation solutions meet more than just traffic and operational objectives.

c. Local Regulations

Metropolitan Transportation Commission – Plan Bay Area 2050

Metropolitan Transportation Commission (MTC) is responsible for regional transportation planning in the nine-county San Francisco Bay Area. MTC most recently updated its Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), a federally-mandated 20-year blueprint for the region, in 2021. This RTP/SCS is known as Plan Bay Area 2050. RTPs must be developed in cooperation with State and local stakeholders and provide a clear vision of the regional transportation goals, policies, objectives, and strategies. This vision must be realistic and within fiscal constraints. Responsibility for approving and overseeing improvements to the State highway system rests with Caltrans, while each local jurisdiction (cities and County) is responsible for planning and implementing improvements to the streets within its boundaries.

The RTP/SCS set forth the following transportation-related goals under the umbrella of Transportation Strategies. Other goals have been established for Housing Strategies, Economic Strategies, and Environmental Strategies. Each Transportation Strategies goal (listed below) has associated supportive strategies to help guide implementation, and performance indicators by which the region can assess its progress.

Goal: Maintain and Optimize the Existing System

- T1:** Restore, operate and maintain the existing system
- T2:** Support community-led transportation enhancements in Equity Priority Communities
- T3:** Enable a seamless mobility experience
- T4:** Reform regional transit fare policy
- T5:** Implement per-mile tolling on congested freeways with transit alternatives
- T6:** Improve interchanges and address key highway bottlenecks
- T7:** Advance other regional programs and local priorities

Goal: Create Healthy and Safe Streets

- T8:** Build a Complete Streets network
- T9:** Advance regional Vision Zero policy through street design and reduced speeds

Goal: Build a Next-Generation Transit Network

- T10:** Enhance local transit frequency, capacity and reliability
- T11:** Expand and modernize the regional rail network
- T12:** Build an integrated regional express lanes and express bus network

Mobility Hub Framework for Transit Access

MTC's Mobility Hub framework is designed to enhance regional transit access by creating strategic, well-connected locations that integrate multiple transportation modes. The framework focuses on making transportation more accessible, convenient, and sustainable by situating hubs in areas with high transit ridership potential and integrating services like bike-sharing, electric vehicle charging, and last-mile connections.

MTC's Mobility Hubs are tailored to meet the needs of different communities, emphasizing flexibility in design and functionality to improve overall mobility in the Bay Area. This framework is part of broader regional efforts to support sustainable growth and equitable access to transportation as outlined in the Plan Bay Area 2050.

Transit-Oriented Communities Policy

The MTC's Transit-Oriented Communities (TOC) Policy aims to enhance the impact of regional transit investments by fostering community development around transit stations and corridors. Aligned with Plan Bay Area 2050, the TOC Policy applies within a 0.5-mile radius of various transit stops. In the case of Cotati, it applies to parcels within a 0.5-mile radius of the Cotati SMART station. This policy emphasizes the integration of housing, commercial development, and transportation infrastructure within a 0.5-mile radius of major transit stations.

Sonoma County Transportation Authority

Sonoma County Transportation Authority (SCTA) was created in 1990 and is governed by a 12-member Board of Directors representing nine cities (Cloverdale, Cotati, Healdsburg, Petaluma, Rohnert Park, Santa Rosa, Sebastopol, Sonoma, and Windsor) and the Sonoma County Board of Supervisors. As a collaborative agency of the cities and County of Sonoma, SCTA works to maintain and improve the transportation network by prioritizing, coordinating, and maximizing the funding available and providing comprehensive, county-wide planning (SCTA 2024).

Countywide Bicycle and Pedestrian Master Plan and Active Transportation Plan

SCTA prepared a Countywide Bicycle and Pedestrian Master Plan (BPMP), which was adopted in 2014 (SCTA 2014). The BPMP, which was developed in collaboration with Rohnert Park and other cities within the county, identifies key bicycle and pedestrian connections in each of the nine incorporated cities in Sonoma County and provides guidance on connectivity between cities in Sonoma County. The document also identifies programs and educational guidelines that encourage a greater shift in bicycle mode share within Sonoma County.

Shift Sonoma County – Low Carbon Transportation Action Plan

The SCTA/Regional Climate Protection Agency (RCPA) prepared a low carbon transportation plan, known as Shift Sonoma County, which was adopted in 2018. Shift Sonoma County identifies key mode shift and fuel shift (i.e., carbon-based fuels to electric) opportunities and provides a

framework for interagency coordination. A model Transportation Demand Management (TDM) ordinance is also provided.

Comprehensive Transportation Plan

Every four years the SCTA updates the Sonoma Comprehensive Transportation Plan (CTP), a multimodal transportation plan that documents existing conditions and prioritizes regional transportation needs throughout Sonoma County for the next 25 years. The CTP establishes countywide goals, objectives, and policies for improving mobility on Sonoma County's streets, highways, transit systems, and bicycle/pedestrian facilities, as well as strategies to reduce transportation related impacts.

Sonoma County General Plan

The Sonoma County General Plan governs the unincorporated areas located outside the cities of Cotati and Rohnert Park. Regional traffic circulates between City and County roadway systems. The Sonoma County General Plan contains a number of policies (listed below) that the City endeavors to coordinate with and support.

Policy CT-1f: Cities should be encouraged to plan for future development with an emphasis on accommodating future traffic within their spheres of influence as much as possible rather than relying upon roadways through surrounding communities or in the unincorporated area.

Policy CT-7y: Work with the Cities of Rohnert Park, Petaluma, and Cotati to enhance east/west traffic flow through these cities to the Highway 101/SMART rail corridor and to evaluate the feasibility of closure of Petaluma Hill Road and diversion of traffic from the Petaluma Hill Road corridor near Railroad Avenue to Highway 101.

Cotati General Plan

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. The Cotati General Plan was adopted in 2015 and addresses current conditions and goals of the City. The Circulation Element of the Cotati General Plan (City of Cotati 2015) contains goals and policies related to transportation, including but not limited to the following:

Goal CI 1: Create a Circulation Network That Reinforces the Desired Land Use Pattern for Cotati, and Provides for the Safe and Efficient Movement of People and Goods to All Parts of the City

Policy CI 1.5: Through the development review process, CEQA process, and through long-range infrastructure planning efforts, identify circulation network improvements and mitigation measures necessary to maintain the City's level of service standards.

Policy CI 1.6: When analyzing impacts to the circulation network created by new development or roadway improvements, consider the needs of all users including those with disabilities, ensuring that pedestrians, bicyclists, and transit riders are considered at an equal level to the needs of automobile drivers.

Policy CI 1.19: Require new development to include effective linkages to the surrounding circulation system for all modes of travel, to the extent feasible.

Policy CI 2.1: Establish and maintain a system of pedestrian facilities and crossing enhancements.

Policy CI 2.11: Establish and maintain bicycle facilities that are consistent with the network depicted in the City's Bicycle and Pedestrian Master Plan.

Policy CI 2.16: Continue to work with Sonoma County Transit to create an effective Rider Awareness Program that will educate the public on the existing transit systems.

Policy CI 2.17: Safe and continuous pedestrian, vehicular, and bicycle access shall be provided at all transit park-and-ride facilities.

Policy CI 2.19: Establish the SMART multi-modal transit station on East Cotati Avenue and Santero Way to provide a link between commuter rail, bus, pedestrian, and bicycle travel and to provide retail and services to serve SMART transit users.

Goal CI 3: Reduce Vehicle Miles Traveled (VMT) in Order to Reduce Congestion and Help Achieve Regional Efforts to Reduce Greenhouse Gas (GHG) Emissions

Policy CI 3.2: Work with SCTA and/or RCPA to monitor the need for and locations of additional park-and-ride lots in Cotati in order to increase the number of trips made by transit and carpooling.

Cotati Municipal Code

Chapter 11 of the Cotati Municipal Code (CMC) addresses Streets and Sidewalks and includes regulations concerning the design, construction, and maintenance of streets, sidewalks, and public rights-of-way within the city. Specifically, CMC Section 11.04.050 establishes all work or improvements shall conform to standard specifications of the city subject to administrative variations authorized by law. Plans for the improvements shall be prepared and signed by a civil engineer or other person licensed by the state to design such works, and the plans and specifications shall be submitted to the city engineer for review and approval prior to any commencement of the work within the public right-of-way. Section 17.26 Street and Streetscape Standards of the CMC identify the standards for the design of public streets and the character of the streetscape between the buildings along public streets. Each street in a proposed development must be designed in compliance with the standards in Section 17.26.

Cotati Active Transportation Plan

The Cotati Active Transportation Plan (ATP) was adopted in May 2024. The plan is an update to the local and countywide BPMP. The ATP was developed as part of the SCTA Countywide ATP and serves as both a stand-alone guide for Cotati's local projects and a component of the SCTA Countywide Plan to enhance coordination. The goal of the ATP is to increase access to active modes of transportation, such as walking and biking, through planning for infrastructure and supportive programs. Its key purposes include assessing needs, identifying improvements, providing eligibility for funding programs, acting as a resource for local actions and regional projects, and fostering cooperation for planning and GIS mapping.

4.13.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines* a project may be deemed to have a significant impact on transportation if it would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
2. Conflict or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b);
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment); and/or
4. Result in inadequate emergency access.

Methodology

The methodology for assessing impacts under thresholds 1, 3, and 4 is qualitative in nature and considers the existing regulations in place that would minimize potential impacts related to transit, roadway, bicycle, and pedestrian facilities; geometric design features; and emergency access.

Under SB 743, congestion-related project effects (such as those measured by LOS or similar metrics) are deemed to be not a suitable basis on which to determine a significant environmental effect. Therefore, threshold 2 evaluates whether the project would conflict or be inconsistent with *CEQA Guidelines* Section 15064.3(b), which describes specific considerations for analyzing transportation impacts as amended on July 1, 2020 pursuant to SB 743. *CEQA Guidelines* Section 15064.3(b) states that VMT is “generally” the most appropriate measure of transportation impacts. No particular methodology or metric is mandated by Section 15064.3(b) and the methodology or metric is left to the lead agency, bearing in mind the criteria the legislature had in mind for determining the significance of transportation impacts in SB 743. These were expressed in Public Resource Code Section 21099(b)(1), which states: “[t]hose criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.”

The assessment of VMT impacts for this EIR was determined by a VMT Assessment Memorandum prepared by Fehr & Peers in September 2024 and included as Appendix D. Therein, it describes Fehr & Peers’ approach and CEQA screening criteria for the VMT assessment.

As discussed in *CEQA Guidelines* Section 15064.3(b)(4), Methodology:

A lead agency has discretion to choose the most appropriate methodology to evaluate a project’s vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project’s vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

As such, in its discretion as lead agency, the City of Cotati has the ability to select the methodology and CEQA significance criteria for use in a CEQA Transportation section. The City of Cotati has updated locally-applicable CEQA metrics, methodology, and significance criteria, with formal adoption in September 2020. Furthermore, the City of Cotati's guidelines, based on OPR's Technical Advisory, provide the following criteria for analyzing transportation projects:

Land Use Project. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop (ex. SMART station) or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Certain projects that decrease vehicle miles traveled in the project area compared to existing conditions may be presumed to have a less than significant transportation impact.

Additionally, based on the Guidelines' VMT screening process, projects can be screened based on specific criteria, including:

Map-Based Screening for Residential and Office Projects. Low-VMT generating areas as shown on the screening maps that follow.

Near transit station (i.e. SMART). Within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor (CEQA Guidelines section 15064.3(b)(1)).

Mixed-Use Projects. Evaluate each component independently and apply the significance threshold for each project type (residential /retail).

If a proposed project does not meet the City's screening requirements, it would be assumed that the project could result in significant impacts to VMT, and further analysis would be required, including quantification of the potential VMT impacts.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN INCREASED USAGE OF THE CIRCULATION SYSTEM INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES. HOWEVER, EXISTING REGULATIONS WOULD ENSURE THAT DEVELOPMENT AND USE OF THE CIRCULATION SYSTEM IS CONSISTENT WITH ADOPTED PROGRAMS, PLANS, ORDINANCES, AND POLICIES. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Transit

The proposed project seeks to enhance connections to the Cotati SMART station and improve bus circulation to and from the station. Specifically, the project seeks to connect gaps in access to the Cotati SMART Station for people of all modalities and abilities, including connections to regional circulation infrastructure, ongoing improvements to the street and sidewalk network and last-mile amenities at the Cotati SMART Station. The proposed project supports a broader network of local and regional buses provided by Sonoma County Transit across Cotati and greater Sonoma County. As discussed in Section 4.11, *Population and Housing*, the project could accommodate an estimated net increase of 1,800 buildout population potential and 769 new dwelling units in the project area. Buildout of the project would increase the number of potential transit users on the various transit

systems serving the city. Increased transit users would result in a correlated increase in demand for transit.

The project would also be consistent with MTC's TOC Policy, which is a framework designed to promote sustainable, equitable development around key transit hubs in the San Francisco Bay Area. The proposed project establishes a course for TOC policy compliance which emphasizes the integration of housing, commercial development, and transportation infrastructure within a 0.5-mile radius of major the Cotati SMART Station. The TOC policy applies to all parcels within the project area. Furthermore, the proposed project incorporates MTC's Mobility Hubs framework. The framework is designed to enhance regional transit access by creating strategic, well-connected locations that integrate multiple transportation modes. The existing transit hubs in the project area include the Cotati SMART Station and bus stops which allow for high transit ridership potential. The proposed project would encourage development in proximity to these existing services and support broader regional efforts for sustainable growth and equitable access to transportation as outlined in the Plan Bay Area 2050.

Overall, development facilitated by the project would not obstruct existing transit services or facilities, nor would it conflict with existing or planned facilities. All new development would be subject to City review, allowing the City to ensure that individual project design would not interfere with transit operations. Transit connections would be supported in accordance with the MTC's TOC Policy, MTC Mobility Hubs framework, and existing SMART infrastructure to continue to support multimodal station access. Impacts to transit would be less than significant.

Roadway

The proposed project does not include modifications to the existing roadway network. Construction activities related to implementation of the proposed project could create potential conflicts with other roadway users, such as construction related activities resulting in lane closures along Santero Way or East Cotati Avenue. Construction under the proposed project would be subject to City regulations. However, construction activities would be temporary by nature and would not result in long-term roadway impacts. As discussed in Section 4.11, *Population and Housing*, the project could accommodate an estimated net increase of 1,800 buildout population potential and 769 new dwelling units in the project area. As such, the anticipated population would result in an influence on existing and future roadways in the project area.

The proposed project would be consistent with roadway and traffic goals and policies outlined in the Cotati General Plan. This includes Policy CI 1.19 which requires new development to include effective linkages to the surrounding circulation system for all modes of travel, to the extent feasible. The proposed project would connect to surrounding roadways and would encourage development near existing transit facilities. In addition, the project would be consistent with Policy CI 2.17 which encourages safe and continuous pedestrian, vehicular, and bicycle access shall be provided at all transit park-and-ride facilities. The project would include circulation and parking improvements which would provide safe and effective routes to the Cotati SMART Station.

In addition to the General Plan, roadway modifications facilitated by the project would conform to State and local standards. Overall, the proposed project would not conflict with existing or planned roadway facilities and impacts would be less than significant.

Bicycle and Pedestrian Facilities

The increase in population associated with the project would increase the demand for bicycle and pedestrian facilities within the project area. The proposed project includes modifications to existing street facilities in the SWSP area to create a more pedestrian- and bicycle-oriented street network. The proposed bicycle network is designed to connect SMART, housing, businesses, and public spaces within the SWSP area, supporting both shorter local trips and increased use of bicycle and pedestrian facilities. Future bicycle and pedestrian roadway modifications facilitated by the project would conform to State and local standards. Specifically, development facilitated by the project would be consistent with the City of Cotati ATP Goal 3, which aims for development to support a diversity of uses and create community through active transportation. The proposed project would support bicycle and pedestrian connections in accordance with the City's ATP, MTC's Mobility Hub framework, and the BPMP. Impacts to bicycle and pedestrian facilities would be less than significant.

Conclusion

Development facilitated by the project would be subject to applicable City guidelines, standards, and specifications. Therefore, the project would not conflict with adopted policies, plans, or programs for transit, roadway, bicycle, or pedestrian facilities. Therefore, impacts to transit, roadway, bicycle, and pedestrian facilities would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold 2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2 THE PROPOSED PROJECT WOULD MEET THE CITY'S SCREENING CRITERIA FOR LOW-VMT AREAS AND WOULD BE CONSISTENT WITH *CEQA GUIDELINES* SECTION 15064.3, SUBDIVISION (B). IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed above under Section 4.13.3(a), *Methodology*, under the City's VMT Guidelines, projects located in areas that have been shown to generate VMT below the threshold of significance may be presumed to have less than significant impacts and no further VMT analysis would be required. More specifically, projects can be screened out based on map-based screening and location to an existing major transit stop. Accordingly, projects located in these areas that have been shown to generate VMT below the threshold of significance may be presumed to have less than significant impacts.

Screening maps provided by the City and data from the SCTA Sonoma County Travel Demand Model were used in determining whether the project is located in an area where VMT per capita is expected to be below the CEQA threshold of significance. While the project includes both residential and commercial land uses, the City's VMT Guidelines note that only residential, office, and industrial projects can be screened out based on the screening maps. As discussed in Appendix D, using the screening maps provided in the City's VMT Guidelines, the proposed project is located in areas

identified in the residential screening map as areas that may be presumed to generate VMT at or below the adopted threshold and would have less than significant VMT impacts.

Furthermore, projects within 0.5 mile of either an existing major transit stop (including the Cotati SMART Station) or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Public transit services in the SWSP area include services by the SMART passenger rail system.

According to OPR's Technical Advisory, an existing major transit stop is defined as:

[a] site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

As such, the Cotati SMART Station can be considered as an existing major transit station, and the entirety of the project area is within 0.5 mile of this station. Thus, based on the VMT screening assessment, the proposed project meets the City's screening criteria and impacts to VMT would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold 3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?
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Impact TRA-3 THE PROPOSED ROADWAY IMPROVEMENTS AND SITE ACCESS MEASURES WOULD BE DESIGNED AND REVIEWED IN ACCORDANCE WITH CITY STANDARDS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The proposed project would include roadway improvements and parking updates within the SWSP area. Specifically, the project seeks to maximize the availability of public parking to support the ongoing and future success of the SMART Station and Santero Way neighborhood. As such, planned and existing rights-of-way would be configured through angled parking to allow a greater amount of available street parking. The SWSP Update includes several private parking policy options aimed at balancing the needs of residents, businesses, and visitors while promoting sustainable transportation choices. These include shared parking strategies, allowing different land uses with varying peak demand times to share parking facilities, thereby optimizing the use of available spaces. The SWSP Update may also implement parking pricing strategies, parking management plans and provide incentives for electric vehicle use through an increase in dedicated charging stations and preferential parking spots. These policies are designed to support a balanced, multi-modal transportation network and foster a more vibrant, pedestrian-friendly community. A primary opportunity to increase the availability of public parking near the Cotati SMART Station is to incorporate into a formal parking lot or structure. In addition, SCT owns a developed parking lot serving the SMART station (Assessor's Parcel Number 144-320-027) that could be expanded, redesigned or redeveloped to provide additional transit serving parking. These policies and

improvements within the SWSP area would improve vehicle circulation as it relates to parking and would not introduce a traffic hazard due to incompatible geometric design features.

As discussed further under Impact TRA-4, the proposed project includes the addition of a secondary emergency access route through Assessor's Parcel Number 144-302-048, providing an internal connection between Breen Way and Santero Way. Proposed land use modifications associated with the proposed project would not introduce incompatible uses to local roadways, bikeways, or pedestrian facilities, as the proposed uses are substantially similar to existing land uses within the city and in adjacent areas.

The City of Cotati maintains standards that guide the construction of new transportation facilities to minimize design hazards for all users of the system. Through the development review process, City staff evaluates development proposals that includes projects that add traffic to streets, which are not designed to current standards. If needed, street improvements are identified therein, and the project is conditioned to construct or provide funding for an improvement that would minimize or eliminate the hazard. Typical improvements include widening, adding turn pockets, adding sidewalks or crosswalks, realigning sharp curves, prohibiting certain turning movements, signaling intersections, and increasing sight distance, among other measures. New and upgraded roadways needed to accommodate future development would be designed according to applicable federal, State, and local design standards, including CMC Sections 11.04.050 and 17.26. Development and infrastructure projects in the project area would be required to comply with the Cotati General Plan, CMC, and applicable State and local regulations. Implementation of the proposed project would not substantially increase hazards due to a geometric design feature or incompatible use and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold: Would the project result in inadequate emergency access?
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Impact TRA-4 THE PROPOSED PROJECT WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Implementation of the proposed project would result in increased development and facilitate population growth, which would increase the number of users of the City's transportation system. Adequate emergency access provisions will need to be made to accommodate increased population and growth. Santero Way is currently a one-way-in, one-way-out cul-de-sac. This feature of the existing street network requires the development of an emergency vehicle access (EVA) route in order to facilitate the development of projects totaling 50 or more units. EVA access to Breen Way shall be provided across Assessor's Parcel Number 144-302-048, which would serve as a secondary emergency vehicle connection and evacuation route to Santero Way. In addition, developments on the east side of Santero Way shall be designed to incorporate a continuous north-south circulation route providing adequate width and turning radius to allow fire engine access through parking lots to and from Depot Way. Streets and drive aisles would be designed to include 13-foot lane widths with proposed alternatives to be approved by Rancho Cotati Fire Protection District. The proposed

design standards would meet CMC Section 14.04.100 which adopts the California Fire Code and requires adequate turning radius for emergency vehicles to access development.

City of Cotati staff, including Rancho Cotati Fire Protection District, will review all site plans for future individual development proposals within the project area to ensure that applicable requirements are met, including provisions for adequate access for emergency responders and response vehicles listed in the Fire Code. Given the project's accommodation of future traffic and consideration future emergency response routes, impacts would be less than significant.

Mitigation Measure

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

4.13.4 Cumulative Impacts

The geographic scope for cumulative transportation impacts includes Sonoma, Napa, Marin, and Solano counties. This is an appropriate assessment area for transportation because most regional traffic originates from and has destinations within this area. While some vehicle trips do originate and end outside of the region, these trips are generally on freeways and do not contribute to trips on local collectors.

Cumulative projects would increase the demand for transit, roadway, bicycle, and pedestrian facilities in the cumulative region. Buildout of the nearby planned projects could result in additional residential and commercial development. Most of this development would be accessible to existing bicycle and pedestrian facilities as well as existing transit stations. This could increase ridership on SMART routes and use of bicycle and pedestrian facilities which could potentially cause deficiencies. However, cumulative projects would be required by the approving agency to be consistent with City's ATP, MTC's Mobility Hub framework, MTC's TOC Policy, existing SMART infrastructure, and BPMP related to transit, roadway, bicycle, and pedestrian facilities. Therefore, cumulative impacts related to transit, roadway, bicycle, and pedestrian facilities would not be significant.

Cumulative projects would result in increased vehicle use on area roadways. The increased use of vehicles in the area would result in a correlating increase in VMT. Development of cumulative projects would increase VMT above existing conditions; therefore, cumulative VMT impacts would be significant. However, as described under Impact TRA-2, the project area is located within 0.5 mile of the Cotati SMART station, an existing major transit station, and would not result in a significant impact on VMT. The proposed project would not significantly contribute to cumulative VMT impacts since the project itself is designed to encourage new development near existing transit facilities, thereby encouraging alternative transportation and a reduction in cumulative VMT. Therefore, the project would not result in a cumulatively considerable contribution to significant cumulative VMT impacts.

Impacts related to design hazards and emergency access are generally site-specific, and cumulative impacts from planned development would not be significant with compliance to CMC requirements and approval by the Rancho Cotati Fire Protection District, or similar requirements from adjacent and nearby jurisdictions with project approval authority. As described under Impacts TRA-3 and TRA-4, impacts related to these topics resulting from the proposed project would be less than significant.

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4.14 Tribal Cultural Resources

This section analyzes the proposed project's impacts on tribal cultural resources. Tribal cultural resources are those resources identified by California Native American Tribes in consultation with lead agencies during tribal consultation (also referred to as Assembly Bill [AB] 52 and Senate Bill [SB] 18 consultation)).

4.14.1 Setting

The project area is located in the traditional tribal territory of the Coastal Miwok. The Coastal Miwok are members of the larger Miwokan subgroup of the Utian language family inhabiting the northern area of Sherman Island surrounding Mount Diablo (Kroeber 1925; Levy 1978). Coastal Miwok territory is bordered by the Pomo to the north, Wappo to the northeast, and Patwin to the east.

Miwok settlements typically included thatched, conical houses and semi-subterranean earth-covered dwellings in winter, constructed by higher status families. Houses generally had a central hearth and an earth oven for cooking purposes. Large, semi-subterranean assembly houses were constructed for use as a ritual and social gathering place. In summer, a circular brush hut was constructed for use in mourning ceremonies. Other structures included sweathouses for curing disease and purification prior to hunting, small conical structures used by menstruating women, and grinding houses built over bedrock mortars to permit food processing in inclement weather. Acorn granaries were constructed for long-term acorn storage (Kroeber 1925; Levy 1978).

Miwok social organization is characterized by the moiety pattern, with all living things belonging to one of two categories: land and water. Moieties typically married outside their own groups which played an important role in many ceremonies (Levy 1978). On the other hand, political organization centered on small tribelets of approximately 300 to 500 people and several distinct settlements. A chief headed each tribelet, and a representative of the chief of each settlement had oversight of local affairs. Chiefs acted as advisors and managed use of natural resources by preventing trespassing on tribelet territory and determining the appropriate time to begin the acorn harvest each season. The chief also arbitrated any disputes and sanctioned the punishment of criminal offenders (Kroeber 1925; Levy 1978).

Traditional Miwok artistry includes twined and coiled basketry, usually from willow and redbud trees. Other activities included the manufacturing of tule mats used as floor covering. Woven blankets were often made of rabbit skin strips or feathers attached to cordage woven from plant fibers. Tule balsa rafts would be used to navigate rivers and sloughs (Levy 1978).

Traditional Miwok subsistence practices centered on the use of acorns and other seeds as primary plant food sources and on hunting of mule deer, tule elk, pronghorn antelope, and various species of waterfowl. Hunting was done typically with a sinew-backed bow and arrow. Fishing was a particularly important activity for the Miwok, primarily with various types of nets. Seines were used in large rivers and sloughs where the pace of water flow was slow. Hook and line was typically used to take sturgeon, while harpoons were the most common implement for salmon fishing (Levy 1978).

The Coast Miwok were exploited for labor by Mission Dolores, established in 1800 in San Francisco, and later by the Mexican land grant holders. As a direct result of the establishment of the mission system, the Coast Miwok population dramatically declined. After the establishment of the United States, the Coast Miwok were legally prevented from owning land in their traditional territories.

Despite this, Coast Miwok continue to populate the Marin area (Milliken et al. 2009; Federated Indians of Graton Rancheria 2016).

4.14.2 Regulatory Setting

a. State Regulations

California Assembly Bill 52

As of July 1, 2015, California AB 52 was enacted and expanded CEQA by defining a new resource category: “tribal cultural resources.” AB 52 states, “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (Public Resources Code [PRC] Section 21084.2). AB 52 further states that, when feasible, the CEQA lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource (PRC Section 21084.3). PRC Sections 21074(a)(1)(A) and (B) define tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and that meets at least one of the following criteria, as summarized in *CEQA Guidelines* Appendix G:

1. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k); and/or
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 subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process with California Native American tribes that must be completed before an Environmental Impact Report can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” California Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Senate Bill 18

SB 18 of 2004 (California Government Code Section 65352.3) requires local governments to contact, refer plans to and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government’s jurisdiction and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research’s Tribal Consultation Guidelines (2005), “[t]he intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.”

Senate Bill 35 and Assembly Bill 168

Enacted on September 29, 2017, SB 35 (California Government Code Section 65913.41) grants a ministerial approval process that expedites and facilitates construction of affordable housing projects without normal CEQA documentation. However, in May 2021, AB 168, an act to amend

Sections 65400, 65913.4, and 65941.1 of SB 35, was passed. AB 168 requires a pre-consultation process with Native American Tribes to identify and protect tribal cultural resources prior to the submission of an SB 35 permit for a housing development.

b. Local Regulations

City of Cotati General Plan

The General Plan for the City of Cotati, which was adopted in 2015, includes goals and policies relating to cultural resources (City of Cotati 2015). As presented in the Conservation Element, goals and policies pertaining to tribal cultural resources include:

Goal CON 4: Protect and Preserve Cotati's Historic and Cultural Resources

Objective CON 4A: Protect Native American Resources and Heritage

Policy CON 4.1: Review proposed developments and work in conjunction with the California Historical Resources Information System, Northwest Information Center at Sonoma State University, to determine whether project areas contain known archaeological resources, either prehistoric and/or historic-era, or have the potential for such resources.

Policy CON 4.2: Ensure that human remains are treated with sensitivity and dignity, and ensure compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.

Policy CON 4.3: Work with Native American representatives to identify and appropriately address, through avoidance or mitigation, impacts to Native American cultural resources and sacred sites during the development review process.

Policy CON 4.4: Consistent with State local and tribal intergovernmental consultation requirements such as SB 18, the City shall consult with Native American tribes that may be interested in proposed new development and land use policy changes.

Action CON 4a: Work with the Federated Indians of the Graton Rancheria to prepare a narrative description of the Native American background of the Cotati area and request the Federated Indians of the Graton Rancheria provide pictorial examples of the types of Native American resources present in the vicinity. Place this description on the City's website as a link under the History of Cotati section.

Action CON 4b: Require a cultural and archaeological survey prior to approval of any development project where a potential or known historical, archaeological, or other cultural resource is located or which would require excavation in an area that is sensitive for cultural or archaeological resources. If significant cultural or archaeological resources, including historic and prehistoric resources, are identified, the project shall be required to implement appropriate measures, such as avoidance, capping of the resource site, or documentation and conservation, to reduce adverse impacts to the resource to a less than significant level.

Action CON 4c: Require all development, infrastructure, and other ground-disturbing projects to comply with the following conditions in the event of an inadvertent discovery of cultural resources or human remains:

- a. If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Department shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Department.
- b. If human remains are discovered during any ground disturbing activity, work shall stop until the Community Development Department and the County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) and the most likely descendants have been consulted; and work may only resume when appropriate measures have been taken and approved by the Community Development Department.

Action CON 4d: Continue to invite the Federated Indians of the Graton Rancheria, as well as other recognized tribes that express interest, to comment on City projects as part of the environmental review process.

4.14.3 Impact Analysis

a. Methodology and Significance Thresholds

No prehistoric archaeological resources, archaeological deposits, or tribal cultural resources were identified in the SWSP parcels or in the vicinity of the project area during the records search, background and archival research, Sacred Lands File request or the survey. The lack of surface evidence of archaeological materials, archaeological literature, and existing level of disturbance throughout the project area (railway line, roadways, as well as industrial, commercial, and residential development), suggests there is a low potential for encountering intact subsurface archaeological deposits. However, the geoarchaeological sensitivity of the project area, inclusive of SWSP parcels and TOC parcels, is moderate, due to the presence of alluvial soils.

In accordance with AB 52 and SB 18, the City conducted AB 52 and SB 18 consultation as the lead agency. The City sent written communication regarding the project on January 23, 2024. Under AB 52 tribes have 30 days to request consultation which ended on February 22, 2024. Under SB 18 tribes have 90 days to request consultation ends on April 22, 2024. The City sent written communication to the following eight Native American tribes (nine contacts total) on January 23, 2024:

- Cloverdale Rancheria of Pomo Indians
- Dry Creek Rancheria of Pomo Indians
- Federated Indians of Graton Rancheria
- Guidiville Rancheria of California
- Lytton Rancheria
- Middletown Rancheria of Pomo Indians
- Pinoleville Pomo Nation
- Robinson Rancheria of Pomo Indians

The City did not receive any response to their written communication and have received no requests for consultation to date.

Appendix G of the *CEQA Guidelines* indicates that a project's impacts to tribal cultural resources would be significant if the project would:

1. 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:
 - a. 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
 - b. 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.

b. Project Impacts and Mitigation Measures

Threshold 1:	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: <ol style="list-style-type: none">a. 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), orb. 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.
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Impact TCR-1 DEVELOPMENT FACILITATED BY THE PROJECT HAS THE POTENTIAL TO IMPACT TRIBAL CULTURAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

The City sent AB 52 and SB 18 letters to eight Native American Tribes culturally and geologically affiliated with the project on January 23, 2024. Although no tribes responded to request consultation and no specific tribal cultural resources were identified during the preparation of this document, tribal cultural resources are known to exist throughout Sonoma County and may be present on site. Ground-disturbing activities associated with individual development projects could expose previously unidentified archaeological resources that may qualify as tribal cultural resources and development facilitated by the project has the potential to adversely impact tribal cultural resources. Potential impacts to tribal cultural resources would be potentially significant.

Mitigation Measures

TCR-1 Suspension of Work Around Tribal Cultural Resources During Construction

In the event that cultural resources of Native American origin are identified during construction of a project, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, the applicant shall prepare and implement a mitigation plan in accordance with State guidelines and in consultation with local Native American group(s). The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City shall review and approve the mitigation plan prior to implementation.

Significance After Mitigation

Implementation of Mitigation Measure TCR-1 would reduce potential impacts to tribal cultural resources from development facilitated by the project by requiring the suspension of work if cultural resources of Native American origin are discovered during construction activities, evaluation of the resource, and appropriate treatment measures. This would reduce potential tribal cultural resource impacts from project implementation to a less than significant level.

4.14.4 Cumulative Impacts

Tribal cultural resources have the potential to extend across the project area; therefore, the appropriate geographic scope for cumulative tribal cultural resources impacts includes development projects adjacent to the project as well as within the surrounding region.

The proposed project, in conjunction with other nearby past, present, and reasonably foreseeable probable future projects in the region, would have the potential to adversely impact tribal cultural resources. Cumulative development in the region would continue to disturb areas with the potential to contain tribal cultural resources. Cumulative projects are reviewed separately by the appropriate jurisdiction and undergo environmental review when it is determined that the potential for significant impacts exists. In the event that future cumulative projects would result in impacts to known or unknown tribal cultural resources, impacts to such resources would be addressed on a case-by-case basis and would likely be subject to mitigation measures similar to those imposed for this project as a result of the CEQA process. Cumulative impacts to tribal cultural resources would therefore be significant. As described under Impact TCR-1, Mitigation Measure TCR-1 would reduce project-level impacts to tribal cultural resources to a less than significant project impact level. With implementation of this mitigation measure, the project would not result in a cumulatively considerable contribution to cumulative impacts to tribal cultural resources.

4.15 Utilities and Service Systems

This section evaluates potential effects on utilities that may occur during implementation of the proposed project. Increased demand is estimated and compared to existing and planned service availability. In this EIR, utilities and service systems consist of water and recycled water supply and distribution; wastewater collection, treatment, and disposal; stormwater collection and discharge; electricity, natural gas, and telecommunications services; and solid waste collection, recycling, and disposal services.

4.15.1 Setting

Cotati is in the North Coast Hydrologic Region and the Santa Rosa Plain Subbasin (Santa Rosa Plain Groundwater Sustainability Agency [GSA] 2023).

a. Water Supply

Sonoma Water serves the communities of Santa Rosa, Sonoma, Cotati, Windsor, Rohnert Park, Petaluma, Novato, Sebastopol, Healdsburg, Cloverdale, Ukiah, and the unincorporated portions of Sonoma County, and the eastern portion of Marin County. The City of Cotati has two sources of water: Sonoma Water supply and local groundwater via three local groundwater wells owned by Cotati. The City of Cotati owns and operates three groundwater production wells in the Santa Rosa Plain Subbasin, which serves as the city's primary water supply source. The City also purchases surface water from Sonoma Water, with increased reliance on Sonoma Water supplies during dry-year conditions, when the availability of local groundwater is reduced (Appendix C). The City receives water from Sonoma Water through two connections to its transmission pipeline, commonly referred to as the aqueduct, which extends through the city (City of Cotati 2023). The City manages these supplies under a 20 percent regulatory reduction. Sonoma Water estimates projected total water sales to the City for 2025 at 931 acre-feet per year (AFY), 1,007 AFY in 2030, 1,013 AFY in 2035, 1,107 AFY in 2040, and 1,215 AFY in 2040. As discussed throughout this section, there is some hydrologic variability to this supply profile (Sonoma Water 2021). The Russian River provides most of Sonoma Water's water supply with groundwater from the Santa Rosa Plain Subbasin as a secondary source. Sonoma Water is expected to have adequate water supplies during normal and multiple dry years to meet its projected demand through 2045 (Sonoma Water 2021).

Groundwater

The City's local groundwater supply is from the Santa Rosa Plain Subbasin of the Santa Rosa Valley Groundwater Basin. The City has three groundwater wells within its city limits that it owns and operates. Groundwater wells owned and operated by the City are described below (City of Cotati 2014):

- **Well No. 1A:** Well 1 was constructed in 1975 and subsequently renovated and changed to Well 1A in the early 1990s, then once again renovated in 2010. Well 1A is equipped with a 25-horse power (HP) vertical turbine pump. The 25 HP pump is rated for a capacity of approximately 425 gallons per minute (gpm). The 25 HP pump fills a storage tank that supplies a 40 HP booster pump station. The 40 HP booster station has a capacity ranging from 340 gpm to 390 gpm.
- **Well No. 2:** Well 2 was constructed in 1976 and renovated in 2009 and is equipped with a 50 HP vertical turbine pump. The 50 HP pump is rated for a capacity of roughly 380 gpm.

- **Well No. 3:** Well 3 was constructed in 1979 and renovated in 2010 and is equipped with a 100 HP vertical turbine pump. The 100 HP pump is rated for a capacity of roughly 700 gpm.

The active wells have a total rated production capacity of approximately 1.3 million gallons per day (MGD). The City manages its groundwater supply in accordance with a 20 percent regulatory reduction. In 2023, approximately 35 percent of the drinking water in Cotati came from the city's groundwater wells, consistent with the 10-year average of approximately 37 percent (City of Cotati 2023).

The City also owns and operates the water distribution system, including pipelines, pumps, and storage tanks. Water storage in the city totals 1.1 million gallons.

Water Supply Vulnerability

The City's water supplies are rainfall replenished water supplies and have some vulnerability to climate change as outlined below.

- **Sonoma Water Supply:** At this time climate change impacts to Sonoma Water's water supply are unknown, although Sonoma Water is working with the United States Geological Survey to analyze potential long-term impacts. However, because Sonoma Water's supply is rainfall-driven, climate change is expected to affect supply in that timing of runoff is expected to become more variable. This will affect reservoir storage, especially in spring and summer months. Annual precipitation is expected to vary with vulnerability to droughts and dry periods.
- **Groundwater:** Climate change can affect the availability and yield from groundwater aquifers. Groundwater levels in the area fluctuate depending on precipitation, aquifer recharge, and pumping. As is the case with the Sonoma Water supply, long-term studies and management plans are focused on minimizing this impact.

b. Wastewater Collection, Treatment and Disposal

The City's sanitary sewer collection system consists of approximately 32 miles of active sewer pipelines ranging in size from 4-inches to 24-inches in diameter, with four sewer lift stations and associated force mains. All wastewater generated within the City limits is ultimately conveyed through a 24-inch interceptor to the City of Santa Rosa's Laguna Treatment Plant (LTP). The LTP has an average daily flow of 15.1 MGD, with an average dry weather flow of 13.6 MGD (City of Santa Rosa 2021: 6-13). The plant has a design capacity of 21.3 MGD of average dry weather flow, 64 MGD of weekly wet weather flow, and 47.3 MGD of monthly wet weather flow (North Coast Regional Water Quality Control Board [RWQCB] 2020). The existing average sewer flow generated within the City's service area was approximately 0.74 MGD in 2023. The LTP treats wastewater to Title 22 tertiary recycled water standards. Water that leaves the system can be beneficially reused in the City of Santa Rosa's reclaimed water system and in the production of geothermal energy at the Geysers. On average, the City of Santa Rosa recycles approximately 7 billion gallons of wastewater each year. During exceptionally wet years, water is occasionally discharged to the Laguna de Santa Rosa (City of Santa Rosa 2024).

c. Stormwater Collection and Discharge

The City owns and maintains a storm drain system that discharges into local creeks which ultimately flows into the Russian River. Stormwater discharges consist of surface water runoff generated from various land uses. The quality of these discharges varies and is affected by geology, land use, season,

hydrology, and sequence and duration of hydrologic events. The City’s stormwater system consists of street gutters, storm drain inlets, catch basins, pipes, and outfalls, as well as ditches and constructed channels. The City’s discharge of stormwater is regulated under Order R1-2015-0030, issued by the North Coast RWQCB and described in Section 4.16.2, *Regulatory Setting*.

d. Electricity

Sonoma Clean Power (SCP) and Pacific Gas and Electric Company (PG&E) serve the City of Cotati. PG&E is responsible for all electric delivery and maintaining the electric grid, and SCP provides an optional electric generation service (customers have the choice to opt out from SCP’s service). SCP provides electricity through two clean energy services: CleanStart and EverGreen. The CleanStart service provides 88 percent carbon-free electricity and sources energy from renewable electricity (e.g., wind, solar, geothermal), carbon-free large hydroelectric power, and general system power. The EverGreen service provides 100 percent renewable electricity and sources energy from primarily geothermal sources and solar power (SCP 2024). PG&E has an energy mix of nuclear, renewable, large hydro, and natural gas (PG&E 2022). Existing power lines are available throughout the city.

As shown in Table 4.15-1, communitywide development in Sonoma County (the smallest scale at which electricity consumption data is readily available) consumed approximately 2,880 gigawatt-hours in 2022, which was approximately 1 percent of statewide electricity consumption (California Energy Commission [CEC] 2024a, 2024b). In comparison, the 2022 population of Sonoma County is approximately 1.2 percent of California’s population (California Department of Finance [DOF] 2024). Therefore, per capita electricity consumption in Sonoma County is slightly lower than the statewide average.

Table 4.15-1 2022 Electricity Consumption

Energy Type	Sonoma County (GWh)	California (GWh)	Proportion of Statewide Consumption ¹
Electricity	2,880	287,826	1%

GWh = gigawatt-hours

¹ For reference, the population of Sonoma County (479,654 persons) is approximately 1.2 percent of the population of California (39,114,785 persons) (DOF 2024).

Source: CEC 2024a

e. Natural Gas

The city is in PG&E’s natural gas service area, which spans central and northern California (PG&E 2014). In 2022, PG&E customers consumed 4.4 billion therms of natural gas. Residential users accounted for approximately 42 percent of PG&E’s natural gas consumption (CEC 2024c). The remainder was used for industry (31 percent), commercial buildings (20 percent), mining and construction (5 percent), other commercial (1 percent), and agricultural and water pump accounts (1 percent) (CEC 2024c).

PG&E’s service area is equipped with approximately 6,400 miles of gas transmission pipelines as 42,000 miles of gas distribution pipelines. A large-diameter gas transmission pipeline runs along Old Redwood Highway within the City of Cotati (National Pipeline Mapping System 2024).

As shown in Table 4.15-2, communitywide development in Sonoma County (the smallest scale at which natural gas consumption data is readily available) consumed approximately 107 million US therms in 2022, which was approximately 2.4 percent of natural gas consumption by PG&E

customers and 0.9 percent of statewide natural gas consumption (CEC 2024b, 2024c). In comparison, the population of Sonoma County is approximately 1.2 percent of California’s population (DOF 2024). Therefore, per capita natural gas consumption in Sonoma is lower than the statewide average.

Table 4.15-2 2022 Natural Gas Consumption

Energy Type	Sonoma County (millions of US therms)	PGE (millions of US therms)	California (millions of US therms)	Proportion of PGE Consumption ¹	Proportion of Statewide Consumption ¹
Natural Gas	107	4422	11,710	2.4%	0.9%

¹ For reference, the population of Sonoma County (479,654 persons) is approximately 1.2 percent of the population of California (39,114,785 persons) (DOF 2024).

Source: CEC 2024b, 2024c

f. Telecommunications

In California, approximately 98 percent of households have access to telecommunication infrastructure, including telephone and cable access (California Broadband Map 2021). Cotati and the County of Sonoma are in the 707 area code and Local Access and Transport Area 1 (California Public Utilities Commission [CPUC] 2010). A Local Access and Transport Area is a geographical area within which a divested Regional Bell Operating Company is permitted to offer exchange telecommunications and exchange access services (CPUC 2020). Internet providers that service the city include Xfinity, Hughesnet, Viasat, T-Mobile, and Comcast (HighSpeedInternet.com 2024). Additionally, a number of wireless data and cellular phone companies provide service options to residents.

g. Solid Waste and Recycling

Recology, a private company, is responsible for the collection of municipal solid waste generated in Cotati. Recology provides weekly curbside collection of refuse, recycling, and compost. Recology collection vehicles deliver the material to Central Landfill outside of Petaluma, California. The City is within the jurisdiction of the Sonoma County Waste Management Agency. The landfill and facility site comprise 398 acres. Approximately 173 acres of the site are permitted for disposal. Central Landfill is anticipated to be operational through 2039 and can accept a maximum throughput of 2,500 tons per day. The remaining capacity of the landfill is 9.1 million cubic yards (California Department of Resources Recycling and Recovery [CalRecycle] 2024a). Table 4.15-3 presents the amount of solid waste disposed of at the Central Landfill that originated from Sonoma County Waste Management Agency between the years of 2015 and 2019.

Table 4.15-3 Annual Solid Waste Disposal

Year	Solid Waste Disposed of at Central Landfill by Sonoma County Waste Management Agency (annual tons)	Solid Waste Disposed of at Central Landfill by other Jurisdictions (annual tons)*
2015	262,736	245
2016	303,976	111
2017	670,018	25
2018	908,918	26
2019	344,282	26

*Other jurisdictions include: Mendocino County (unincorporated), Point Arena, and Napa County

Source: CalRecycle 2024b

4.15.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The federal Clean Water Act (CWA), enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several State and local laws throughout the country. The Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA gave the United States Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the CWA is administered by the USEPA and United States Army Corps of Engineers. At the State and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine RWQCBs.

Section 402 of the CWA requires that all construction sites on an acre or greater of land, as well as municipal, industrial, and commercial facilities discharging wastewater or stormwater directly from a point source, such as a pipe, ditch, or channel, into a surface water of the United States must obtain permission under the National Pollutant Discharge Elimination System (NPDES) permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

Safe Drinking Water Act

The Safe Drinking Water Act (42 United States Code Section 300[f] et seq.; 40 Code of Federal Regulations [CFR] Section 141 et seq.) regulates public water systems that supply drinking water. The main components of the Safe Drinking Water Act are to:

1. Ensure that water from the tap is potable (safe for drinking, cooking, and hygiene)
2. Prevent contamination of groundwater aquifers that are the main source of drinking water for a community
3. Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 CFR Section 144)
4. Regulate distribution systems

Title 40 of the Code of Federal Regulations

Title 40 of the CFR, Part 258 (Resource Conservation and Recovery Act Subtitle D) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 set energy efficiency standards for lighting (specifically light bulbs) and appliances.

Energy Star Program

Energy Star is a voluntary labeling program introduced by the USEPA to identify and promote energy-efficient products to reduce GHG emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now also includes certifying commercial and industrial buildings as well as homes (Energy Star 2024).

Telecommunications Act

In 1996, the Federal Communications Commission (FCC) passed the Telecommunications Act, allowing any communications business to compete in any market against any other business. This act affects telephone service, cable programming, and other video services, including broadcast services and services provided to schools (FCC 2013).

b. State Regulations

Water and Wastewater

Sustainable Groundwater Management Act

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the Department of Water Resources (DWR).

The Santa Rosa Plain Subbasin is a medium priority basin. As a result, in 2017, the City and other eligible water suppliers in groundwater basin joined together to form the Santa Rosa Plain GSA and develop a groundwater sustainability plan. The Santa Rosa Plain GSA is further described under the *Local Regulations* section below.

Urban Water Management Planning Act

In 1983 the California Legislature enacted the Urban Water Management Planning Act (Water Code Section 10610–10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt an urban water management plan (UWMP) at least once every five years and submit them to the DWR. Noncompliant urban water suppliers are ineligible to receive funding pursuant to Division 24, commencing with Section 78500, or Division 26, commencing with Section 79000, or receive drought assistance from the State until the UWMP is submitted and deemed complete pursuant to the Urban Water Management Planning Act.

Title 22 of California Code of Regulations

Among other things, Title 22 of the California Code of Regulations (Title 22) regulates public water systems and provides the authority for the SWRCB's Division of Drinking water to issue permits to

public water systems. The City operates a public water system under permit number CA4910014. As required by its permit the City regularly monitors the quality of water it delivers and distributes annual consumer confidence reports to customers.

California Building Standards Code

CCR Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2022 Title 24 standards. The California Building Standards Code's standards related to utilities and service systems are outlined below.

PART 5 – CALIFORNIA PLUMBING CODE

The California Plumbing Code is codified in Title 24, California Code of Regulations, Part 5. The Plumbing Code contains regulations including, but not limited to, plumbing materials, fixtures, water heaters, water supply and distribution, ventilation, and drainage. More specifically, Part 5, Chapter 4, contains provisions requiring the installation of low flow fixtures and toilets. Existing development will also be required to reduce its wastewater generation by retrofitting existing structures with water efficient fixtures (Senate Bill [SB] 407 [2009] Civil Code Sections 1101.1 et seq.).

PART 11 – CALIFORNIA GREEN BUILDING STANDARDS

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The 2022 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers (Tiers I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

Regarding water conservation and stormwater drainage, the mandatory standards include requirements for a 20 percent reduction in indoor water use relative to specified baseline levels,¹ the use of water-efficient irrigation systems for new development with an aggregate landscape area equal or greater than 500 square feet, and other indoor and outdoor water efficiency and conservation measures such as separate water submeters for subsystems and specific fixtures and fittings. The voluntary standards include stricter water conservation requirements for specific fixtures as well as 20 percent permeable paving for the Tier 1 standards and 30 percent permeable paving for the Tier II standards.

Electricity and Natural Gas

California Energy Commission

As the State's primary energy policy and planning agency, the CEC collaborates with State and federal agencies, utilities, and other stakeholders to develop and implement State energy policies. Since 1975, the CEC has been responsible for reducing the State's electricity and natural gas demand, primarily by adopting new Building and Appliance Energy Efficiency Standards that have contributed to keeping California's per capita electricity consumption relatively low. The CEC is also

responsible for the certification and compliance of thermal power plants 50 megawatts and larger, including all project-related facilities in California (CEC 2024d).

California Public Utilities Commission

The CPUC regulates investor-owned electric and natural gas utilities operating in California. The energy work responsibilities of the CPUC are derived from the California State Constitution, specifically Article XII, Section 3 and other sections more generally, numerous State legislative enactments and various Federal statutory and administrative requirements. The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from PG&E and other natural gas utilities across California (CPUC 2024).

Senate Bill 350

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires a doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Solid Waste

California Department of Resources Recycling and Recovery

CalRecycle oversees, manages, and monitors waste generated in California. CalRecycle provides limited grants and loans to help California cities, counties, businesses, and organizations meet the State waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites, including facilities that accept hazardous waste substances and non-hazardous waste. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including Assembly Bill (AB) 939 and SB 1016, both of which are described below.

Assembly Bill 939

AB 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing and stimulate the purchase of recycled products.

Senate Bill 1016

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. The Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

Assembly Bill 341 – Mandatory Commercial Recycling

The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing

facilities in California. AB 341 required all businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units to recycle by July 1, 2012. AB 341 also sets a statewide goal of 75 percent waste diversion.

Senate Bill 1383

SB 1383, which was passed in 2016, requires 75 percent organic waste diversion be achieved by 2025. The intent of SB 1383 is to reduce short-lived climate pollutants that are released by organic waste when such waste decomposes in landfills instead of being recycled into green products, such as compost.

c. Regional and Local Regulations

Countywide Integrated Waste Management Plan

The Countywide Integrated Waste Management Plan, dated October 15, 2003, provides a solid waste disposal strategy through the year 2050. The Sonoma County Waste Management Agency prepared this plan for the jurisdictions of Rohnert Park, Cloverdale, Cotati, Healdsburg, Petaluma, Santa Rosa, Sebastopol, Sonoma, Windsor, and the County of Sonoma. The plan includes the following goals, objectives, and policies to ensure adequate waste prevention, reuse, recycling, composting, and disposal services, intended to promote sustainability, conservation of natural resources, and achieve solid waste diversions.

Cotati Municipal Code

Title 13 of the Cotati Municipal Code includes regulations related to potable water, stormwater, and wastewater, including when extensions of service are allowed or require additional approvals, construction requirements for transmission systems, permit requirements. Chapter 13.02.010, City Water System, Established-Scope establishes the City's public water supply system to include all public facilities for the production and distribution of water, and all improvements, additions, and extensions thereto.

Chapter 8.08 of the Cotati Municipal Code includes regulations related to the storage, accumulation, collection, and disposal of solid waste in the City. Requirements associated with the diversion of recyclables, organics, and other materials are also outlined.

Cotati General Plan

The City of Cotati General Plan includes the following goals, objectives, and policies applicable to utilities and service systems.

Objective CSF 1A: Ensure that new growth and development do not exceed the City's ability to provide necessary public services and do not overburden existing public services and facilities

Policy CSF 2.2: Prior to the approval of development, infrastructure, Specific Plans, or other projects that would result in increased demand for public water production, conveyance, treatment or shortage, project proponents must demonstrate proof of adequate water supply (e.g., that existing services are adequate to accommodate the increased demand, or improvements to the capacity of the system to meet increased demand will be made prior to project implementation) and that potential cumulative impacts to water users and the environment will be addressed.

Policy CSF 2.3: Ensure the water system and supply is adequate to match rate of development.

Goal CSF 2: Ensure that adequate water, wastewater, fire, and police services are available to serve existing land uses and areas of planned growth, as identified in the General Plan Land Use Map

Objective CSF 2A: Provide an adequate supply of clean, safe, fresh, and environmentally sound water to existing and planned users within the City's service area

Objective CSF 2B: Provide for adequate sewer service

Policy CSF 2.22: Prior to the approval of development that would result in increased demand for municipal sewage conveyance and treatment, require projects to demonstrate that existing services are adequate to accommodate the increased demand or that improvements to the capacity of the system to meet increased demand will be made prior to project implementation.

Goal CSF 3: Ensure safe, convenient, and environmentally responsible waste disposal and recycling services throughout the City

Objective CSF 3A: Provide adequate solid waste disposal services and increase recycling and reuse among residents, businesses, and city departments

Policy CSF 3.1: Provide adequate waste disposal, recycling, and reuse services, including programs that improve public access to solid waste collection and recycling facilities.

Policy CSF 3.2: Reduce solid waste and increase reduction, reuse, and/or recycling, in compliance with the Countywide Integrated Waste Management Plan.

Policy CSF 3.3: Work with the Sonoma County Waste Management Agency to identify environmental and economical means to meet the need for solid waste disposal.

Policy CSF 3.4: Require and/or support the operation of resource recovery facilities by the City waste hauler and the disposal site operators.

Policy CSF 3.8: Require new or significantly remodeled residential and all non-residential development to incorporate sufficient, attractive, and convenient interior and exterior storage areas for recyclables and green waste.

4.15.3 Impact Analysis

a. Significance Thresholds

In accordance with Appendix G of the *CEQA Guidelines*, a significant utilities impact would occur if new development facilitated by the proposed project would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
2. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
4. 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; and/or
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project require or result in the relocation or construction of new or expanded storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
Threshold 2:	Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
Threshold 3:	Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact UTIL-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE DEMAND ON EXISTING WATER, WASTEWATER, ELECTRIC POWER, NATURAL GAS, TELECOMMUNICATIONS, AND STORMWATER DRAINAGE FACILITIES. HOWEVER, DEVELOPMENT FACILITATED BY THE PROJECT WOULD OCCUR IN DEVELOPED AREAS OF THE CITY WHERE THESE FACILITIES GENERALLY EXIST, AND THE EXPANSION OF EXISTING FACILITIES WOULD NOT BE NECESSARY TO ACCOMMODATE DEVELOPMENT FACILITATED BY THE PROJECT. WATER SUPPLIES WOULD BE SUFFICIENT TO MEET DEMAND OF DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT UNDER NORMAL, DRY, AND MULTIPLE DRY YEAR SCENARIOS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Water

A Water Supply Assessment (WSA) was prepared for the proposed project and is included as Appendix C. The City of Cotati owns and operates three groundwater production wells in the Santa Rosa Plain Subbasin, which serves as the city's primary water supply source. The City also purchases surface water from Sonoma Water, with increased reliance on Sonoma Water supplies during dry-year conditions, when the availability of local groundwater is reduced. The proposed project would introduce up to 769 dwelling units and 651,365 square feet of non-residential commercial land uses in the project area. The supply availability projections from Sonoma Water's 2020 UWMP are informed in part by the City of Cotati's *2020 Water Demand and Conservation* report (City of Cotati 2020). As a result, the supply availability projections presented in Table 4.15-4 and Table 4.15-5 below account for anticipated water demands within the City of Cotati, including growth that would be accommodated by the proposed project.

Table 4.15-4 Sonoma Water – Normal Year Supply and Demand

	2025	2030	2035	2040	2045
Supply totals ¹	65,020	69,177	70,725	72,588	74,547
Demand totals	65,020	69,177	70,725	72,588	74,547
Difference	0	0	0	0	0

¹ When excess supply is available, the projected supply is shown as equal to demand.

Source: Sonoma Water 2021:6-3

Table 4.15-4 shows that Sonoma Water would have adequate water supply available in normal years to meet all projected demands through 2045.

Table 4.15-5 Sonoma Water – Single Dry Year Supply and Demand

	2025	2030	2035	2040	2045
Supply totals ¹	65,020	58,168	58,897	59,789	60,656
Demand totals	65,020	69,177	70,725	72,588	74,547
Difference	0	-11,009	-11,828	-12,799	-13,891

¹ When excess supply is available, the projected supply is shown as equal to demand.

Source: Sonoma Water 2021:6-4

Table 4.15-5 shows that water demands are expected to exceed available supplies during single dry years starting in 2030. This shortage reflects the availability of surface water supplies, and results from anticipated declines in Lake Sonoma storage, coupled with Sonoma Water’s water rights requirement to decrease diversions by 30 percent under these conditions. In anticipation of single dry-year shortage conditions, Sonoma Water would work with its contractors and customers to reduce water demands and utilize local supplies to the extent feasible, which have been successful strategies in the past. Sonoma Water would also work with the State Water Resources Control Board (SWRCB) and other Russian River water users to reduce water demands. Based on efforts over the last five years which have been characterized by dry conditions, Sonoma Water does not anticipate any difficulty in maintaining an adequate water supply during single dry-year conditions. (Sonoma Water 2021:6-3).

Table 4.15-6 shows that Sonoma Water projects no water supply deficiencies during multiple consecutive dry-year conditions, with adequate water supply available to meet demands through the 2045 planning horizon. The water demands presented do not reflect local water supply developed by Sonoma Water’s individual contractors, such as groundwater usage conducted by the City of Cotati; rather, these demands reflect the amount of water anticipated to be needed by Sonoma Water contractors to meet their local needs, in addition to their respective local supplies.

Table 4.15-6 Sonoma Water – Multiple Dry Years Supply and Demand

		2025	2030	2035	2040	2045
First Year	Supply totals ¹	65,020	69,177	70,725	72,588	74,547
	Demand totals	65,020	69,177	70,725	72,588	74,547
	Difference	0	0	0	0	0
Second Year	Supply totals	65,020	69,177	70,725	72,588	74,547
	Demand totals	65,020	69,177	70,725	72,588	74,547
	Difference	0	0	0	0	0
Third Year	Supply totals	65,020	69,177	70,725	72,588	74,547
	Demand totals	65,020	69,177	70,725	72,588	74,547
	Difference	0	0	0	0	0
Fourth Year	Supply totals	65,020	69,177	70,725	72,588	74,547
	Demand totals	65,020	69,177	70,725	72,588	74,547
	Difference	0	0	0	0	0
Fifth Year	Supply totals	65,020	69,177	70,725	72,588	74,547
	Demand totals	65,020	69,177	70,725	72,588	74,547
	Difference	0	0	0	0	0

¹ When excess supply is available, the projected supply is shown as equal to demand.

Source: Sonoma Water 2021:6-4

As determined in the WSA, Sonoma Water anticipates having sufficient supply available to meet all demands within its service area, including for the City of Cotati. Although there are projected shortfalls during single dry-year conditions beginning in 2030, those are anticipated to be covered through collaborative conservation and demand reduction by Sonoma Water contractors, which has been a consistently successful strategy conducted during drought years to meet all necessary demands. Furthermore, water demands associated with the proposed project are conservatively estimated to total 205 AFY. In 2023, the total volume of water delivered by the City of Cotati within its service area was just under 250 million gallons, or 759 acre-feet (AF), of water, which included 266 AF pumped from the City's three municipal wells and 494 AF purchased from Sonoma Water (City of Cotati 2024). The actual 2023 water usage of 759 AF was approximately 33 percent less than projected in the City's General Plan EIR, providing a delta of approximately 297 AF. The proposed project's water demands are less than the difference between projected water demands and actual water demands within the City of Cotati in 2023, suggesting that sufficient water is available for the proposed project from existing sources.

Based upon the data and analysis presented in this WSA, sufficient water supply would be available for the proposed project over a minimum 20-year planning horizon, and including under normal-year, single dry-year, and multiple dry-year conditions.

Development facilitated by the proposed project may require the installation of additional water main lines, lateral connections, and hydrants within the project area. However, such facilities would be installed during individual project construction and within the disturbance area of such projects or the rights-of-way of previously disturbed roadways where infrastructure improvements would not substantially increase the project's disturbance area or otherwise significant environmental effects beyond those already identified throughout this EIR.

Therefore, sufficient water supplied are available to serve reasonably foreseeable development under the proposed project, and appropriate systems are in place to address potential drought-related water supply shortages, such that potential impacts would be less than significant.

Wastewater

Development facilitated by the project would generate new sources of wastewater, which would flow through the existing City of Cotati sewer system and would be treated at the LTP in the City of Santa Rosa. Because development facilitated by the project would occur within the urbanized area of the City, existing wastewater infrastructure already exists. Similar to water infrastructure, as described above, increased density could require upgraded pipeline or pumps. As part of the proposed project, the existing sewer pipeline in Santero Way would be upsized to 8- or 10-inches to meet minimum pipe diameter and capacity constraints. Generally, the ground disturbance required to construct these upgrades would occur in previously disturbed or developed rights-of-way, reducing the potential for environmental impacts. Additionally, this pipeline improvement has been analyzed throughout this EIR as part of the project. Therefore, the proposed project would not result in construction or relocation of wastewater collection facilities such that significant environmental impacts would result.

The wastewater generation calculations for the development facilitated by the proposed project are based on the estimated water demand described above. Wastewater generation is estimated to be 130 percent of water demand, due to consumptive use and irrigation use. Using the water demand estimate of 205 AFY from the WSA, wastewater generation would be 267 AFY which is approximately 0.2 million gallons per day (MGD). The LTP has the capacity to treat 21.3 MGD of average dry weather flow, but currently treats approximately 13.6 MGD of average dry weather

flow (City of Santa Rosa 2021: 6-13). The proposed project would account for approximately 2.6 percent of the LTP's 13.6 MGD remaining dry weather capacity.

The existing wastewater treatment capacity of the LTP would be sufficient to accommodate the proposed project. Therefore, implementation of the proposed project would not result in the need to expand the capacity of the LTP. The proposed project would have a less than significant impact on wastewater facilities.

Stormwater

As discussed in Section 4.8, *Hydrology and Water Quality*, development facilitated by the project would be required to comply with the NPDES MS4 General Permit and the City's Low Impact Development Manual which requires BMPs for stormwater retention and runoff. Development facilitated by the project would also be required to comply with Chapter 13.68 of Cotati Municipal Code, which establishes the City's stormwater ordinance and includes provisions for eliminating sources of stormwater runoff. Development facilitated by the project may require the installation of additional stormwater infrastructure on individual project sites. Such facilities would be installed during individual project construction and within the disturbance area of such projects or the rights-of-way of previously disturbed roadways; therefore, the construction of these infrastructure improvements would not substantially increase the project's disturbance area or otherwise cause significant environmental effects beyond those already identified throughout this EIR.

Electric Power

Development facilitated by the proposed project would create additional demand for electricity. As discussed in Section 4.16.2, *Effects Found Not to be Significant*, development facilitated by the proposed project would not result in the inefficient or wasteful use of energy. Development facilitated by the proposed project would occur within the already developed and urbanized areas of the City where electric infrastructure, for both PG&E and SCP, is already present. Development facilitated by the project would also be subject to applicable local, regional, State, and federal policies regarding energy efficiency including new iterations of Title 24 and CALGreen which require increasingly more efficient appliances and building materials that reduce energy consumption in new development, including on-site solar for new residential development. Therefore, the proposed project would not require expansion or relocation of electric power facilities and impacts related to electric power facilities would be less than significant.

Natural Gas

Development facilitated by the proposed project would connect to existing natural gas infrastructure to meet the needs of site residents and tenants. Based on the availability of existing natural gas infrastructure, construction of new natural gas pipelines would not be required, and all sites would be able to connect to existing infrastructure. Therefore, there would be adequate natural gas facilities to serve the future development in the project area and impacts related to natural gas facilities would be less than significant.

Telecommunications

Development facilitated by the proposed project would require connections to existing adjacent utility infrastructure to meet the needs of future residents and tenants. Based on the availability of existing telecommunications infrastructure, construction of new telephone and cable lines would not be required, and individual projects would be able to connect to existing infrastructure. Future

development projects would be required to adhere to applicable laws and regulations related to the connection to existing telecommunication infrastructure. Therefore, there would be adequate telecommunications facilities to serve future development in the project area and impacts related to telecommunication facilities would be less than significant.

Mitigation Measure

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold 4:	Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
Threshold 5:	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE VOLUME OF SOLID WASTE GENERATED IN COTATI. HOWEVER, LOCAL INFRASTRUCTURE SERVING THE CITY HAS ADEQUATE CAPACITY TO ACCEPT THE ADDITIONAL WASTE. FURTHERMORE, THE CITY OF COTATI GENERAL PLAN CONTAINS GOALS, OBJECTIVES, AND POLICIES TO INCREASE RECYCLING AND COMPLY WITH STATE AND LOCAL MANAGEMENT REDUCTION REGULATIONS. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would result in the addition of up to 769 residential units and 651,365 square feet of commercial space. As shown in Table 4.15-7, the proposed project would generate an estimated 8.9 tons, or 17.9 cubic yards, of solid waste per day associated with these land uses.

Table 4.15-7 Proposed Project Projected Solid Waste Generation

Land Use	Proposed Project			Projected Wastewater Generation		
	Quantity	Unit	Generation Rate ¹	Solid Waste (pounds per day)	Solid Waste (tons per day)	Solid Waste (cubic yards per day) ²
Residential Units	769	Dwelling units	12.23 pounds/dwelling unit/day	9,405	4.7	9.4
Commercial	651,365	Square feet	13 pounds/1,000 square feet/day	8,468	4.2	8.5
Total				17,873	8.9	17.9

¹ Source: CalRecycle 2019

² Conversion factor assumed to be 1,000 pounds per cubic yard.

According to CalRecycle, the remaining capacity of the Central Landfill is 9,085,715 cubic yards, with a maximum daily permitted throughput of 2,500 tons per day. The project would yield a daily solid waste generation rate of approximately 8.9 tons per day. This would account for approximately 0.4 percent of the maximum daily throughput of the Central Landfill.

In addition, the City of Cotati is required by AB 939 to divert 50 percent of solid waste from landfills and by SB 1383 to divert 75 percent of organic waste by 2025. Consistent with the Sonoma County

Waste Management Agency's Countywide Integrated Waste Management Plan, the City of Cotati would comply with the requirements of AB 939. Local infrastructure would have the capacity to accommodate solid waste generated by development facilitated by the proposed project. These policies would require the reduction of solid waste generation in the City and increase recycling efforts throughout the City. New development facilitated by the project would be required to provide on-site trash, recycling, and compost receptacles for collection and disposal in an effort to increase diversion of solid waste from new residential and non-residential uses. With adherence to the required solid waste diversion rates, impacts related to solid waste would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

4.15.4 Cumulative Impacts

The cumulative analysis considers the nearby past, present, and reasonably foreseeable future projects listed in Table 3-1.

Water

The geographic scope for cumulative water supply impacts is the Santa Rosa Plain Groundwater Basin and Sonoma Water's service area. This geographic scope is appropriate because these are the sources of groundwater and water supply that would supply water to development facilitated by the proposed project and cumulative projects relying on the same water supply sources.

Cumulative development in the water service area will continue to increase demands on water supplies, including from sources such as Sonoma Water and local groundwater. The Sonoma Water 2020 UWMP shows that Sonoma Water has adequate water supply to meet demands through 2045 under most conditions, including under the five-year drought risk assessment (Sonoma Water 2021). Therefore, cumulative impacts to water supply facilities would be less than significant. Cumulative development in the water service area may require the expansion and/or construction of new water facilities. However, upgrades and expansion of water facilities would likely be conducted at the time of project construction and within existing disturbed areas, such as paved roadways. Therefore, cumulative impacts to water facilities would be less than significant.

Wastewater

The geographic scope for cumulative wastewater facilities impacts encompasses all areas within the Santa Rosa Subregional System and serviced by the LTP. This geographic scope is appropriate because the local wastewater operator is responsible for treating and discharging wastewater to all land uses within its service area.

Cumulative development in the wastewater service area will continue to increase wastewater generation. As described under Impact U-2, there is sufficient existing wastewater capacity to accommodate anticipated cumulative development. The LTP has a remaining capacity for dry-weather flow of 13.6 MGD and as such, would have sufficient capacity to accommodate cumulative

projects. Therefore, cumulative impacts related to wastewater facilities would be less than significant.

Stormwater

The geographic scope for cumulative stormwater impacts is the City's stormwater collection area. This geographic scope is appropriate because the City is responsible for providing stormwater collection services to all residential, commercial, industrial, and fire protection uses within its service area.

Cumulative development would be located in an urban area that is served by the City's existing municipal storm drainage system. Cumulative development would comply with NPDES MS4 General Permit and the City's Low Impact Development Manual which requires BMPs for stormwater retention and runoff that would in turn reduce the volume and velocity of cumulative stormwater runoff. Cumulative development in the stormwater collection area may require the expansion and/or construction of new stormwater facilities. However, upgrades and expansion of stormwater facilities would likely be conducted at the time of cumulative project construction and within existing disturbed areas. Therefore, cumulative impacts to stormwater facilities would be less than significant.

Electricity and Natural Gas

The geographic scope for cumulative electricity and natural gas impacts is the PG&E and SCP service area. This geographic scope is appropriate because, as the local providers, PG&E and SCP are responsible for transmitting electricity (PG&E and SCP) and natural gas (PG&E only) to all land uses within its service area. SCP relies on PG&E infrastructure to supply electricity.

PG&E is subject to the requirements set forth and/or enforced by the CPUC which is responsible for conducting and managing environmental review of infrastructure projects. The need for electric and natural gas infrastructure would be addressed on a case-by-case basis for each cumulative project, and would be subject to CPUC requirements, similar to those applicable to the project. Cumulative development projects would be subject to applicable local, regional, State, and federal policies regarding energy efficiency including new iterations of Title 24 and CALGreen which require increasingly more efficient appliances and building materials that reduce energy consumption in new development, including on-site solar for new residential development. Therefore, cumulative impacts related to electric power and natural gas transmission facilities would be less than significant.

Telecommunication

The geographic scope for cumulative telecommunications impacts is Sonoma County. This geographic scope is appropriate because local providers are responsible to provide adequate telecommunication infrastructure to all land uses within the county.

Cumulative development would increase demand for telecommunications infrastructure in the county. However, cumulative projects would each be required to provide adequate telecommunications infrastructure on a project-by-project basis and would be subject to the same requirements as the project. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

Solid Waste Facilities

The geographic scope for cumulative solid waste impacts encompasses all areas in the county that contribute solid waste to the Central Landfill. This geographic scope is appropriate because, as the local provider, the Central Landfill is responsible for accepting solid waste from all land uses within its service area.

As discussed in Section 4.14.1(g), the Central Landfill is projected to reach its maximum capacity in year 2039 (CalRecycle 2024a). Compliance with applicable solid waste regulations and with required solid waste diversion requirements would maintain or improve upon diversion rates. Cities in the region have implemented waste diversion programs and policies to meet state-mandated solid waste diversion rates. Thus, cumulative impacts to solid waste facilities would be less than significant.

4.16 Effects Found Not to be Significant

During evaluation of the proposed project, certain impact areas included in the California Environmental Quality Act (CEQA) Appendix G checklist were found to have a less than significant impact or no impact. As allowed under *CEQA Guidelines* Section 15128, this section discusses why impacts to these environmental topics were determined to have a less than significant impact or no impact and therefore are not discussed in detail in the Draft Environmental Impact Report (EIR) as individual sections.

4.16.1 Agriculture and Forestry Resources

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- b. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*
- c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*
- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- e. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

There are no areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) within the project area (California Department of Conservation 2022). There are no Williamson Act contracts within or adjacent to the City of Cotati, including the project area (County of Sonoma 2018). Project site parcels are not zoned for agricultural use, forest land, or timberland (refer to Section 2.3.1, *Current Land Use Designation and Zoning*), nor are parcels adjacent to the project site (refer to Section 2.3.2, *Surrounding Land Uses*). There are no parcels in the project area that meet the definition of a forestry resource, as defined by California Public Resources Code Section 12220(g); or timberland, as defined by Public Resources Code section 4526.

The proposed project would not result in the conversion of Farmland or agricultural to non-agriculture uses, or forest land to non-forest uses. There would be no impact on agricultural uses, Important Farmland, Williamson Act Contracts, forest land, or timberland.

4.16.2 Energy

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

The project would facilitate the development of additional housing and commercial land uses in a transit-oriented area. Construction in the project area would require energy in the form of petroleum-based fuels used to power construction vehicles and equipment on individual project sites, construction worker vehicles, and construction delivery vehicles. Energy use during

construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the area. In addition, construction contractors would be required to comply with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the United States Environmental Protection Agency Construction Equipment Fuel Efficiency Standard, such as Tier 4 emission standards and certification requirements, which would also minimize particulate matter emissions (United States Environmental Protection Agency 2024). Furthermore, per applicable regulatory requirements such as the Green Building Standards Code (CALGreen; California Code of Regulations Title 24, Part 11), development facilitated by the project would be required to comply with construction waste management practices to divert a minimum of 65 percent of construction debris from disposal at a landfill. These practices would result in efficient use of energy necessary to construct the project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, the project would not involve the inefficient, wasteful, or unnecessary use of energy during construction, and construction impacts related to energy consumption would be less than significant.

Operation of development facilitated by the project would contribute to regional energy demand by consuming electricity, natural gas, gasoline, and diesel fuels. Electricity and natural gas would be used for residential heating and cooling systems, lighting, appliances, and water and wastewater conveyance, among other purposes. Gasoline and diesel consumption would be associated with vehicle trips generated by residents. The project would be required to comply with all standards set in the latest iteration of the California Building Standards Code (California Code of Regulations Title 24), which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. CALGreen standards require installation of energy-efficient light fixtures and building materials into the design of new construction projects. Further, the Building Energy Efficiency Standards (California Code of Regulations Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the California Energy Commission. Residences would be required to install photovoltaic systems and would be equipped with Energy Star appliances, WaterSense fixtures, and high-performance ventilation systems. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. Therefore, project operation would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

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

The City of Cotati has not adopted any specific renewable energy or energy efficiency plan. However, the General Plan Land Use Element and Conservation Element contains policies that aim to conserve energy by promoting sustainable building practices, efficient resource management, and GHG reduction. Policies LU-1.5 and CON-3.1 encourage best practices in green building and stormwater management, ensuring infrastructure has minimal impact on energy, water, and sewer resources, while CALGreen Tier 1 standards ensure energy-efficient construction. Policies CON-2.8 and CON-2.10 emphasize the need for a Climate Action Plan and voluntary business efforts to reduce energy use and emissions (City of Cotati 2015).

Applicable state plans for renewable energy or energy efficiency include the Warren-Alquist Act, Assembly Bill (AB) 2076, Senate Bill (SB) 100, SB 350, AB 1493, AB 1007, the Energy Action Plan, Title 24, and CALGreen. The Warren-Alquist Act established the California Energy Commission (CEC) in 1975 to promote energy conservation and reduce wasteful energy use. AB 2076 encourages reducing petroleum reliance through alternative fuels and vehicle efficiency. The California Renewables Portfolio Standard (SB 100) and SB 350 set goals for increasing renewable energy use to 60 percent by 2030 and improving energy efficiency. AB 1493, or the Pavley bill, mandates greenhouse gas (GHG) emission reductions from vehicles. The Energy Action Plan and AB 1007 promote alternative fuels, while Title 24 and CALGreen establish energy efficiency and sustainable building standards, helping reduce GHG emissions and fossil fuel consumption across California. The project would comply with these state and local plans by encouraging transit-oriented development, mixed-use spaces, and rezoning of areas near the Cotati SMART Station, facilitating high-density, walkable neighborhoods that reduce vehicle reliance and energy consumption, aligning with the city's sustainability and energy goals.

The project supports the Sonoma County Climate Action Plan GHG reduction goals to reduce GHG emissions by 40 percent by 2030 and 80 percent by 2050 (County of Sonoma 2016). The project supports these goals by promoting transit-oriented development near the Cotati SMART Station and integrating mixed-use development which would reduce vehicle trips, reduce GHG emissions, and increase energy efficiency. The focus on transit-oriented development and mixed-use development also supports the goals of encouraging transportation modes other than automobiles, which would promote walkability. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, including the above policies from the General Plan. Impacts would be less than significant.

4.16.3 Mineral Resources

- a. Would the project result in a loss of availability of a known mineral resource that would be of value to the region and residents of the state?*
- b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

There are no mineral resources, existing mines, major mineral deposits, or critical minerals within the project area (United States Geological Survey 2020). There is one active mining operation, Stony Point Quarry, located approximately 1 mile southwest of the Cotati city limits. However, the proposed project would not impede or otherwise interrupt the mining operation. Additionally, the project area is not located within a mineral resource zone (MRZ) known to contain the presence of significant mineral resources (California Geological Survey 2005, 2013). Therefore, the project would have no impact to mineral resources.

4.16.1 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The project area is not located in a State Responsibility Area or a Very High Fire Hazard Severity Zone. However, the City of Cotati is adjacent to a Moderate Fire Hazard Severity Zone (California Department of Forestry and Fire Protection 2024). The nearest State Responsibility Area is approximately 2 miles west of the project area. The project area is surrounded primarily by existing or planned development. Large tracts of wildland fuels, such as forest or brushland, do not occur within or near the project area.

The City of Cotati has an Emergency Operations Plan and provides emergency preparedness informational resources on its website. The proposed project involves updates to land use designations and includes design standards and guidelines that ensure orderly development and compatibility with existing infrastructure. These measures would prevent uncoordinated growth that could otherwise obstruct emergency response access or operations. Additionally, development facilitated by the project would undergo local review, where they would be evaluated for compliance with emergency access and safety standards, ensuring that emergency response routes remain functional and unobstructed. The project's focus on high-density, transit-oriented development also helps concentrate growth in areas with established emergency response frameworks. The project would not substantially impair any emergency response plans or emergency evacuation plans. Impacts would be less than significant.

Per typical California wildfire behavior, wildfire within the project area would spread most rapidly on sloped terrace areas. The project area and immediately surrounding areas do not contain steep slopes that could facilitate extreme wildfire activity. The nearest slopes are located approximately 1.6 miles southwest of the project area. Given the lack of sloping land on the project site, fire spread would be slower when compared to sloping areas, which are more than 1.5 miles away. Prevailing winds in the area primarily blow towards the east (National Oceanic and Atmospheric Administration 2022), and, given that the steeper slopes are east of the site, prevailing winds would typically spread fire and smoke further to the east, away from the site. Therefore, the construction of the proposed project would not be expected to significantly expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

Proposed on-site infrastructure and roadways would conform with City standards and would not be located in undeveloped areas that have high fuel loads such as dry grasses or dense forests. Accordingly, wildfire impacts related to the installation of new infrastructure on site would be less than significant.

As discussed above, the project site is located on relatively flat land, which would not exacerbate landslide or flooding risk to the site or surrounding area. Impacts related to landslides and flood risks are further discussed in Section 4.5, *Geology and Soils*, and Section 4.8, *Hydrology and Water Quality*. Following wildfire events, the proposed project would not increase the risk of flooding or landslides, as site topography and designated flood zones would not be modified substantially from existing conditions. In addition, the project area is not located within a Federal Emergency Management Agency designated flood area (Federal Emergency Management Agency 2023). Therefore, any changes to the risk of wildfire impacts facilitated by the project regarding post-fire slope instability or drainage changes would be very low. If a structural fire were to occur within the project area after development has been completed, the generally flat topography of the project area would render the risk of flooding or landslide afterward negligible. Impacts would be less than significant.

In addition, the project area is surrounded by developed land within the City of Cotati, and thus there is minimal fuel load on and surrounding the project area. As such, the current conditions would not be expected to experience extreme wildfire behavior, and development of the project would not expose new residents to wildfire because the project area is located in a developed area near existing infrastructure and services, far from high-risk wildfire zones. Development facilitated by the project would comply with local fire safety codes, ensuring adequate emergency access, defensible space, and building construction standards that mitigate fire risk. Additionally, the project area is not situated in a designated Very High Fire Hazard Severity Zone. Therefore, the project would not expose people or structures to a significant risk involving wildfires, flooding, or landslides, nor exacerbate the risk of wildfire. Impacts would be less than significant.

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5 Other CEQA Required Discussions

This section discusses growth-inducing impacts and irreversible environmental impacts that would be caused by the proposed project.

5.1 Growth Inducement

There are two types of growth-inducing impacts that a plan or project may have: direct and indirect. To assess the potential for growth-inducing impacts, the proposed project's characteristics that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated. *CEQA Guidelines* Section 15126.2(e) requires a discussion of a proposed plan or project's potential to foster economic or population growth, including ways in which a plan could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. A significant growth-inducing impact may result if the proposed plan would:

- Induce substantial population growth in an area (for example, by proposing or facilitating new residences or employment-generating uses beyond the land use density/intensity envisioned in existing planning documents);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; and/or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list when such infrastructure exceeds the needs of a project and could accommodate unplanned future development.

Direct growth-inducing impacts occur when the implementation of a plan or project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional developments in the same area. Also included in this category are plans or projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure cannot be considered isolated from the development they facilitate and serve. Plans or projects that physically remove obstacles to growth or otherwise indirectly induce growth may provide a catalyst for future unrelated development in an area such as a new residential community that requires additional commercial uses to support residents.

5.1.1 Population Growth

The buildout anticipated under the proposed project could accommodate an estimated 1,800 residents, 769 new dwelling units, and 651,365 square feet of commercial uses in the project area, which includes both the Santero Way Specific Plan (SWSP) Area and TOC parcels. As discussed in Section 4.11, *Population and Housing*, growth anticipated under the proposed project would not exceed population estimates under the Association of Bay Area Government's Plan Bay Area 2050, which is the Regional Transportation Plan/Sustainable Communities Strategy and provides anticipated population, employment, and housing growth estimates for the region. The anticipated

population growth as a result of the proposed project would be within the Association of Bay Area Government growth projections of 4,757 residents for the City of Cotati.

Finally, it is the specific purpose of the proposed project to guide growth and development in the SWSP area and TOC parcels. All proposed development would occur within the City's limits and the proposed project supports infill development within the project area. Therefore, by its nature, the proposed project is intended to reduce the potential for uncontrolled growth and associated environmental impacts. Therefore, the project would not induce substantial unplanned growth and would not result in impacts related to growth inducement.

5.1.2 Economic Growth

The project would generate temporary employment opportunities during construction, and as part of the proposed commercial land uses within the project area. Because construction workers would be expected to be drawn from the existing regional work force, construction of the project would not be growth-inducing from a temporary employment standpoint. Additionally, construction would be relatively short-term and would be completed in phases; therefore, it would be unlikely that temporary workers would move to the region permanently for construction jobs. As discussed within Section 2, *Project Description*, the project would result in roughly 459,076 square feet of non-residential commercial land uses within the SWSP Area and 192,289 square feet of non-residential commercial uses within the TOC Area, totaling approximately 651,365 square feet of commercial development across the project area. The proposed commercial development would generate permanent employment opportunities in Cotati for residents. Through implementation of policies in the General Plan, the City would reduce significant physical effects on the environment resulting from economic growth. For example, as described in Section 4.12, *Public Services and Recreation* and Section 4.15, *Utilities and Service Systems*, the implementation of policies in the General Plan would ensure that there are sufficient public services and utilities to meet the demand associated with population and economic growth. Therefore, the proposed project would not be expected to induce substantial economic expansion to the extent that direct physical environmental effects would result.

5.1.3 Removal of Obstacles to Growth

The project area is located in a fully developed area that is well served by existing infrastructure. As discussed in Section 4.15, *Utilities and Service Systems*, and Section 4.13, *Transportation*, of this EIR, no off-site improvements would be necessary to serve the project. Although development of some vacant land within the SWSP area and TOC parcels would require new utility connections and a new secondary access roadway along Santero Way, new development would occur primarily where existing roads, water, sewer, and other utilities are already in place. Development would use existing facilities and would not occur in or be designed to serve areas beyond the sites analyzed in this EIR. Development facilitated by the project would occur within the project area and city limits. Therefore, project implementation would not remove an obstacle to growth.

5.2 Irreversible Environmental Effects

Section 15126(d) of the *CEQA Guidelines* requires that an EIR evaluating projects involving amendments to public plans, ordinances, or policies contain a discussion of significant irreversible environmental changes. CEQA requires decision-makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project.

This section addresses the use of non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the development that would be facilitated by implementation of the proposed project.

Construction activity associated with development facilitated by the project would involve the use of building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development in the region and are not unique to Cotati or the proposed project. The addition of new residential and non-residential development in the project area would irreversibly increase local demand for non-renewable energy resources such as petroleum and natural gas. Increasingly efficient building fixtures and automobile engines, as well as implementation of General Plan Land Use Element and Conservation Element Policies LU-1.5, CON-3.1, CON-2.8, and CON-2.10, are expected to offset the increased demand for these non-renewable resources to some degree. It is not anticipated that growth facilitated by the project would substantially affect local or regional energy supplies.

Growth facilitated by the proposed project would require an irreversible commitment of city services, water supply, and wastewater treatment. As discussed in Section 4.12, *Public Services and Recreation*, and Section 4.15, *Utilities and Service Systems*, impacts to public services and utilities would be reduced to a less than significant level with implementation of policies included in the General Plan. Additionally, as discussed within Section 4.15, *Utilities and Service Systems*, existing water supply, wastewater, and solid waste infrastructure that serves the city would continue to provide adequate supply.

5.2.1 Significant and Unavoidable Impacts

The additional vehicle trips associated with development facilitated by the project would incrementally increase local traffic and regional air pollutants. As discussed in Section 4.2, *Air Quality*, implementation of the 2040 General Plan policies, regional air pollution programs, and mitigation measures would reduce the air pollutant emissions associated with future development projects in the project area to below significance thresholds. As discussed in Section 4.13, *Transportation*, the proposed project would include implementation of General Plan policies and Cotati Municipal Code requirements which would reduce transportation impacts to a less than significant level.

CEQA Guidelines Section 15126(b) requires a discussion of the significant environmental effects which cannot be avoided if the project is implemented. These significant and unavoidable impacts are identified in Section 4, *Environmental Impact Analysis* and summarized below. The project would have the significant and unavoidable impacts on greenhouse gas emissions and noise. The additional vehicle trips associated with development facilitated by the project would also increase greenhouse gas emissions and traffic noise levels within the project area. As discussed within Section 4.6, *Greenhouse Gas Emissions*, the project would include implementation of Mitigation Measure GHG-1. However, due to legal uncertainty with a jurisdiction's ability to enforce natural gas bans and potential economic and/or technological infeasibility of meeting CALGreen Tier 2 standards, this impact result in significant and unavoidable impacts. In addition, as discussed in Section 4.10, *Noise*, implementation of Mitigation Measures N-1a through N-1c would be required with implementation of the proposed project. However, construction and operational noise could exceed noise standards and would result in significant and unavoidable impacts despite the implementation of mitigation.

CEQA requires decision-makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would result in significant and unavoidable impacts to greenhouse gas emissions and noise. Although development facilitated by the project would be required to implement mitigation measures, impacts would remain significant and unavoidable.

5.3 Secondary Effects

According to CEQA Guidelines Section 15126.4(a)(1)(D), an EIR should analyze whether mitigation measures would cause one or more significant effects in addition to those that would be caused by the project as proposed. As such, this section discusses potential secondary effects from implementation of mitigation measures that would be imposed on development facilitated by the project.

Mitigation Measure BIO-1 would reduce or avoid environmental impacts to sensitive species, specifically nesting birds. This measure requires construction activities to be scheduled outside of nesting season, to avoid the nesting season. This measure may place restrictions on construction activities but would not result in secondary environmental impacts.

Mitigation Measures CUL-1a, CUL-1b, CUL-2a, and CUL-2b would prevent impacts to historic and archaeological resources through surveys and avoidance or monitoring. They may restrict, delay, or halt construction (such as during unanticipated discovery of a resources), but they would not result in secondary environmental impacts.

Mitigation Measures GEO-9a and GEO-9b would provide protections for unanticipated paleontological resources during construction and would ensure the proper treatment of paleontological resources upon discovery during construction activities. This measure may place restrictions on construction activities but would not result in secondary environmental impacts.

Mitigation Measure GHG-1 would ensure that future development facilitated by the proposed project would be consistent with BAAQMD thresholds 1.a. and 2.b but would not result in secondary environmental impacts.

Mitigation Measure HAZ-6 would require the preparation of a Traffic Control Plan, which would ensure that construction vehicle traffic, road or lane closures or diversions, and other disturbances to local roadways resulting from construction activities are controlled. This measure would also ensure that emergency access routes are maintained, and emergency vehicles continue to have adequate access in the vicinity of construction sites. This measure may place restrictions on construction activities but would not result in secondary environmental impacts.

Mitigation Measures N-1, N-2, N-3, and N-4 would require development to adhere to construction-related noise reduction measures, operational noise analysis, roadway vehicle noise reduction measures, and a vibration control plan. These would reduce noise levels but would not result in secondary environmental impacts.

Mitigation Measure TCR-1 would reduce potential impacts to tribal cultural resources from development facilitated by the project by requiring the suspension of work if cultural resources of Native American origin are discovered during construction activities, evaluation of the resource, and appropriate treatment measures. This measure may place restrictions on construction activities but would not result in secondary environmental impacts.

6 Alternatives

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives (stated in Section 2 of this EIR) but would avoid or substantially lessen the significant adverse impacts.

As discussed in Section 2, *Project Description*, the objectives for the proposed project are as follows:

- Increase opportunities for residential development by identifying suitable areas and ensuring compliance with zoning and environmental standards.
- Promote smaller-scale commercial development by encouraging diverse commercial districts that contribute to the City's identity, culture, and economy, provide jobs, and generate revenue for the City.
- Support mixed-use development to serve community needs by integrating residential, "maker" scale light industrial, commercial, and community spaces, and enhancing neighborhood vibrancy and walkability.
- Expand community spaces and amenities by developing public spaces, renovating existing facilities, and engaging residents in planning priorities.
- Meet Transit-Oriented Communities (TOC) requirements for station areas by developing guidelines, enhancing accessibility, and integrating sustainable design practices into transit-oriented development projects.

Included in this analysis are three alternatives, including the CEQA-required "no project" alternative, that involve changes to the project that may reduce the project-related environmental impacts as identified in this EIR. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project
- Alternative 2: Station-Oriented Density
- Alternative 3: Modified Density Allocation

6.1 Alternative 1: No Project

6.1.1 Description

Alternative 1 assumes that the proposed Specific Plan Update and rezoning of TOC parcels associated with the proposed project would not occur, and development within the project area would be limited by the existing zoning and land use designations of individual parcels. Alternative 1 would not expand the SWSP area, and parcels currently outside of the SWSP area would not undergo zoning or land use designation changes. Additionally, the current SWSP, with the current development allowances, would continue to provide land use control over the current SWSP area. Based on the history of stalled redevelopment of the SWSP area, it is not anticipated that substantial development would occur in the SWSP area under this alternative. The overall development anticipated under Alternative 1 is provided in Table 6-1.

Table 6-1 Alternative 1 Development Projections

	Residential (Multi-Family) (units)	Commercial (sf)	Population Estimate ¹
SWSP Area	40	271,910	94
TOC Parcels	112	86,080	262
Total	152	357,990	356

sf = square feet

¹ Population estimates were calculated using the California Department of Finance (DOF) estimate of 2.34 persons per household for 2024 (DOF 2024).

Alternative 1 would not fulfill any project objectives because it would not increase opportunities for residential development, smaller-scale commercial development, or mixed-use development; expand community spaces; or meet the TOC station area requirements.

6.1.2 Impact Analysis

a. Aesthetics

Development under this alternative would continue the land use pattern that currently exists in the project area. The visual character and light and glare conditions of the SWSP and TOC parcels would be slightly improved as compared to the proposed project because this alternative would involve less dense infill development, and slightly reduced overall development. Less dense development in the focus areas would result in improved visibility and reduced light and glare as compared to the proposed project. Impacts would be less than significant and reduced as compared to the proposed project due to the reduction in the overall level and intensity of development within the project area. Impacts would be reduced when compared to the proposed project.

b. Air Quality

Under the No Project Alternative, less development would occur consistent within the project area. Temporary construction-related air quality impacts from grading and construction and long-term air quality impacts from building operation (energy usage, maintenance), would be lower than under the proposed project. Impacts would be reduced when compared to the proposed project.

c. Biological Resources

The No Project Alternative would allow development under existing zoning and land use designations. Because the sensitive species and habitats of the project area would remain, direct impacts to biological resources would be similar to those that would occur with the proposed project, but at much fewer sites as only up to 152 dwelling units would be developed. Development allowed under the No Project Alternative would be smaller in scale; however, ground disturbance would result in similar impacts to biological resources. Impacts would be similar to though slightly reduced from the proposed project.

d. Cultural Resources

The No Project Alternative would allow development under existing zoning and land use designations at a smaller scale than under the proposed project but could still entail ground disturbance or excavation activities. It is assumed that development under existing zoning would result in similar impacts to historic or potentially historic buildings on some of the project area;

therefore, the No Project Alternative would not eliminate a significant and unavoidable impact to historic resources. Ground disturbance from development allowed under existing zoning would still have potential impacts to archaeological resources and human remains, although likely to a lesser extent than under the proposed project due to decreased size and scale of potential new structures. Impacts would be similar to though slightly reduced from the proposed project.

e. Geology and Soils

The No Project Alternative would allow for development under existing zoning and land use designations, which would involve construction or ground disturbance that could expose and loosen soils and increase the potential for erosion. The project area would remain outside Alquist-Priolo fault zones, and future construction on any of the sites would be required to comply with California Building Code requirements, ensuring the stability of new structures during seismic events or due to expansive soils. Development allowed under existing zoning, similar to development facilitated by the proposed project, would occur in areas of high paleontological sensitivity; however, development allowed under the No Project Alternative would be smaller in scale and scope than allowed under the proposed project. Impacts would be reduced when compared to the proposed project.

f. Greenhouse Gas Emissions

Under the No Project Alternative, less development would occur, consistent with allowed existing zoning. Temporary construction-related greenhouse gas (GHG) emissions that result from grading and construction of new development and long-term impacts resulting from building operation (energy use, maintenance, and traffic) would be lower than under the proposed project. Impacts would be reduced when compared to the proposed project.

g. Hazards and Hazardous Materials

Under the No Project Alternative, the transport, storage, and use of hazardous materials associated with construction of development allowed under existing zoning, and operation of residential and commercial uses, such as paints and solvents, would be required to comply with existing regulations, similar to the proposed project. Sites containing existing contamination would continue to require remediation and compliance with State and local regulations to allow for development under existing zoning. The project area would remain outside airport influence areas, and no impact related to airport safety hazards would occur under the No Project Alternative, as with the proposed project. Impacts would be similar to those under the proposed project.

h. Hydrology and Water Quality

The No Project Alternative would allow development under existing zoning, which could include construction activities that would loosen and expose soils, otherwise increase the potential for soil erosion and sedimentation, and create new or additional impervious surfaces. Due to the more limited extent of development allowed under existing zoning, these impacts would be less than those under the proposed project. Similar to the proposed project, development allowed under the No Project Alternative would not substantially decrease groundwater supplies or violate water quality standards, following compliance with applicable laws and regulations. The smaller total buildout allowed under existing zoning would have fewer impacts on hydrology and water quality than the proposed project. Impacts would be reduced when compared to the proposed project.

i. Land Use and Planning

Under the No Project Alternative, the SWSP and TOC parcels would retain their existing zoning and land use designations, allowing future buildout in accordance with that zoning. The No Project Alternative would not alter connectivity with adjacent areas or divide established communities. Future development under existing zoning would be required to comply with regulatory goals and policies, similar to the proposed project, as discussed in Impact LU-2. The No Project Alternative would result in less intensive future development, which would not promote high-density housing opportunities to the extent that the proposed project would. Impacts would be similar to the proposed project.

j. Noise

Under the No Project Alternative, less intensive impacts associated with temporary construction-related noise would result from grading and construction of development allowed under existing zoning, as less intensive development of the project area would be allowed. Similarly, the No Project Alternative would result in less intensive long-term impacts resulting from building operation and traffic noise. Impacts would be reduced when compared to the proposed project.

k. Population and Housing

Since development would follow existing patterns, the No Project Alternative would not induce substantial population growth or contribute to unplanned growth and would also not displace people or housing. The No Project Alternative would have no impact to population and housing, while the proposed project would have less than significant impacts. Impacts under the No Project Alternative would be less than those for the proposed project. However, the No Project Alternative would not provide the benefits associated with the provision of housing that would occur under the proposed project.

l. Public Services and Recreation

Development allowed in accordance with the existing zoning would occur under the No Project Alternative, and this alternative would result in a smaller increase to emergency calls to the area, as well as a smaller increase in additional demand for schools, parks, libraries, recreational facilities, or other public services. Impacts under the No Project Alternative would be less than those under the proposed project.

m. Transportation

Under the No Project Alternative, less intensive temporary construction-related traffic impacts from grading and construction of development allowed under existing zoning would occur. The No Project Alternative would have a smaller increase in transit demand or interference with existing or planned transit facilities than the proposed project. The No Project Alternative would not alter vehicle miles traveled (VMT) and would result in reduced VMT compared to the proposed project. Impacts would be reduced when compared to the proposed project.

n. Tribal Cultural Resources

The No Project Alternative would result in less development within the project area than the proposed project, but development could entail ground disturbance or excavation activities.

Accordingly, the No Project Alternative would still have the potential to unearth and impact tribal cultural resources. Impacts would be similar to, and slightly reduced from the proposed project.

o. Utilities and Service Systems

Development allowed under existing zoning and land use designations would occur under the No Project Alternative, and this would result in an increase in demand for water, wastewater, electricity, natural gas, telecommunications, and solid waste service. This increase in demand would be less than the proposed project due to the reduced scale of development allowed under existing zoning, compared with the proposed project; however, the expansion of water and wastewater infrastructure would still be required for sites not already adjacent to existing infrastructure. Impacts would be reduced when compared to the proposed project.

6.2 Alternative 2: Station-Oriented Density

6.2.1 Description

Alternative 2 would rezone parcels within the SWSP area only. Alternative 2 would establish a residential density minimum of 36 units per acre and maximum of 61 units per acre within the SWSP area. This increased density in the SWSP area would satisfy requirements based on preliminary analysis and guidance from MTC regarding the TOC station area. The anticipated development scenario for Alternative 2 is provided in Table 6-2.

Table 6-2 Alternative 2 Development Projections

	Residential (Multi-Family) (units)	Commercial (sf)	Population Estimate ¹
SWSP Area	769	459,076	1,800
TOC Parcels	0	0	0
Total	769	459,076	1,800

sf = square feet

¹ Population estimates were calculated using the California Department of Finance (DOF) estimate of 2.34 persons per household for 2024 (DOF 2024).

However, Alternative 2 may not achieve the project objective of encouraging and facilitating commercial development, as commercial square footage in the SWSP area under Alternative 2 would be the same as under the proposed project, but with no additional commercial space proposed on the TOC parcels. Furthermore, this alternative would not implement the objective of TOC policy implementation because a majority of the parcels within the 0.5-mile radius of the SMART station would not be evaluated for TOC policy implementation.

6.2.2 Impact Analysis

a. Aesthetics

Under Alternative 2, buildout of 769 residential units would occur, similar to the proposed project. The development facilitated by Alternative 2 would occur solely within the SWSP area and would result in denser development than what is proposed by the project. This would be achieved through residential density minimum of 36 units per acre and maximum of 61 units per acre and increased building heights. However, commercial development would be decreased compared to the

proposed project. Additionally, no development would occur on the TOC parcels, and impacts to aesthetics would be reduced compared to the proposed project. Because development would be denser than proposed project within the SWSP area, impacts on scenic vistas, scenic resources, visual character or quality, and light and glare would be increased compared to the proposed project.

b. Air Quality

Alternative 2 would result in slightly reduced commercial development compared to the proposed project, however, it would result in the same number of residential units as the proposed project, just focused within the SWSP area. Accordingly, temporary construction-related air quality impacts that result from grading and construction would be similar to the proposed project, except within the SWSP area only. Since Alternative 2 would result in the same number of residential units and only slightly reduced commercial development, operational VMT impacts would be similar to the proposed project. Alternative 2 would concentrate denser development within the SWSP area which would allow for slightly reduced VMT per capita. Overall, Alternative 2 would result in marginally lower operational air quality emissions than the proposed project but air quality impacts would be similar to the proposed project.

c. Biological Resources

Under Alternative 2, buildout of 769 residential units would occur, similar to the proposed project. However, development would be concentrated in the SWSP area. The development facilitated by Alternative 2 would result in the same ground disturbance as under the proposed project for SWSP area but would result in reduced ground disturbance on the TOC parcels. Ground disturbance within the SWSP area would be generally similar to the proposed project and impacts on special-status species, riparian or sensitive habitats, protected wetlands, wildlife movement, conflicts with local ordinances, would be the same. However, development would not occur on the TOC parcels and ground disturbance would be lessened compared to the proposed project. Similar to the proposed project, Mitigation Measure BIO-1 would be required to reduce impacts to less than significant. Impacts would be similar, though slightly reduced, compared to the proposed project.

d. Cultural Resources

Under Alternative 2, buildout of 769 residential units would occur, similar to the proposed project. The development facilitated by Alternative 2 would result in the same ground disturbance as under the proposed project for SWSP area but would result in reduced ground disturbance on the TOC parcels. Ground disturbance within the SWSP area would be generally similar to the proposed project, thus impacts on historic resources, archaeological resources, and human remains would be the same. However, development would not occur on the TOC parcels and ground disturbance would be lessened compared to the proposed project. Similar to the proposed project, Mitigation Measures CUL-1a, CUL-1b, CUL-2a, and CUL-2b would be required to reduce impacts, although impacts to historic resources would remain significant and unavoidable. Impacts would be similar to, though slightly reduced, compared to the proposed project.

e. Geology and Soils

Under Alternative 2, buildout of 769 residential units would occur, similar to the proposed project. The development facilitated by Alternative 2 would result in the same ground disturbance as under the proposed project for the SWSP area but would result in reduced ground disturbance on the TOC

parcels. Ground disturbance within the SWSP area would be generally similar to the proposed project, thus impacts from earthquakes, seismic-related ground failure, erosion, expansive soils, and paleontological resources would also be the same. However, development would not occur on the TOC parcels and ground disturbance would be lessened compared to the proposed project. Similar to the proposed project, Mitigation Measures GEO-9a and GEO-9b would be required to reduce impacts to less than significant. Impacts would be similar to, though slightly reduced, compared to the proposed project.

f. Greenhouse Gas Emissions

Alternative 2 would result in slightly reduced commercial development compared to the proposed project, however, it would result in the same number of residential units as the proposed project, just focused within the SWSP area. Accordingly, temporary construction-related GHG emissions that result from grading and construction would be similar to the proposed project, except on fewer parcels. Since Alternative 2 would result in the same number of residential units and only slightly reduced commercial development, operational VMT would be similar to the proposed project. Alternative 2 would concentrate denser development within the SWSP area which would allow for slightly reduced VMT per capita which would result in slightly reduced GHG impacts. Similar to the proposed project, Mitigation Measure GHG-1 would be required to reduce impacts, although impacts related to GHG emissions would remain significant and unavoidable. Overall, Alternative 2 would result in slightly lower operational GHG emissions than the proposed project and would have slightly smaller GHG impacts as a result. Impacts would be slightly reduced when compared to the proposed project.

g. Hazards and Hazardous Materials

Under Alternative 2, buildout of 769 residential units would occur, similar to the proposed project. The development facilitated by Alternative 2 would result in the same ground disturbance as under the proposed project for the SWSP area but would result in reduced ground disturbance on the TOC parcels. Ground disturbance within the SWSP area would be generally similar to the proposed project, thus impacts from hazardous materials transport, development on sites included on a list of sites pursuant to Government Code Section 65926.5, development near an airport, and impairment of an emergency plan would be the same. However, development would not occur on the TOC parcels and ground disturbance would be lessened compared to the proposed project. Similar to the proposed project Mitigation Measure HAZ-6 would be required and impacts would be less than significant following compliance with applicable hazardous materials laws and regulations. Impacts would be similar to, though slightly reduced, compared to the proposed project.

h. Hydrology and Water Quality

Under Alternative 2, buildout of 769 residential units would occur, similar to the proposed project. However, commercial development would be decreased compared to the proposed project. Alternative 2 would allow denser development within the SWSP area compared to the proposed project, but construction activities would occur on a similar scale as the proposed project. Therefore, impacts related to erosion, impervious surfaces, and flooding, would be the same within the SWSP area but reduced on the TOC parcels. Similar to the proposed project, development allowed under Alternative 2 would not substantially decrease groundwater supplies or violate water quality standards, following compliance with applicable laws and regulations. Impacts would be similar to, though slightly reduced, compared to the proposed project.

i. Land Use and Planning

Alternative 2 would facilitate development within the SWSP area but not the TOC parcels. Similar to the proposed project, Alternative 2 would not alter connectivity with adjacent areas or divide established communities, as it would encourage infill development within a previously developed area of Cotati. Alternative 2 would be consistent with the General Plan goals and policies included in Section 4.9, *Land Use and Planning*, similar to the proposed project. This alternative would also result in the future development of infill sites, and the intensity of development would be increased compared to the proposed project. However, Alternative 2 may not achieve the project objective of encouraging and facilitating commercial development, as commercial square footage in the SWSP area under Alternative 2 would be the same as under the proposed project, but with no additional commercial space proposed on the TOC parcels. Impacts would be similar to than the proposed project.

j. Noise

Under Alternative 2, the amount of construction required would be similar to the proposed project but slightly reduced due to the decreased commercial development. Alternative 2 would result in similar temporary construction-related noise and vibration impacts. Long-term noise impacts resulting from building operation would be the same as the proposed project for Alternative 2. Similar to the proposed project, Mitigation Measures N-1, N-2, N-3, and N-4 would be required to reduce impacts, although construction noise and operational traffic noise impacts would remain significant and unavoidable. Impacts would be similar to the proposed project.

k. Population and Housing

Like the proposed project, development facilitated by Alternative 2 would result in approximately 769 new dwelling units and approximately 1,800 new residents. However, unlike the proposed project, this population growth would be focused within the SWSP area. Similar to the proposed project, Alternative 2 would not contribute to unplanned growth and would also not displace people or housing. Impacts under Alternative 2 would be similar to the proposed project.

l. Public Services and Recreation

Development facilitated by Alternative 2 would increase the demand for fire protection, police protection, schools, parks, recreational facilities, and other public facilities. This alternative would introduce the same number of residents as the proposed project, which would result in similar demands for schools, parks, and recreational facilities in Cotati. Impacts under Alternative 2 would be similar to the proposed project.

m. Transportation

Alternative 2 would result in slightly reduced commercial development compared to the proposed project, however, it would result in the same number of residential units as the proposed project, just focused within the SWSP area. Alternative 2 would concentrate denser development within the SWSP area which would allow for slightly reduced VMT per capita which would result in marginally reduced VMT impacts compared to the proposed project. Alternative 2 would result in the same temporary construction-related traffic impacts within the SWSP area and reduced impacts on TOC parcels. Similarly, Alternative 2 would have a similar increase in transit demand as the proposed project. Impacts would be similar to the proposed project.

n. Tribal Cultural Resources

Under Alternative 2, buildout of 769 residential units would occur, similar to the proposed project. The development facilitated by Alternative 2 would result in the same ground disturbance as under the proposed project for SWSP area but would result in reduced ground disturbance on the TOC parcels. Ground disturbance within the SWSP area would be generally similar to the proposed project, thus impacts on tribal cultural resources would be the same. However, development would not occur on the TOC parcels and ground disturbance would be lessened compared to the proposed project. Similar to the proposed project, Mitigation Measure TCR-1 would be required to reduce impacts. Impacts would be similar to, though slightly reduced, compared to the proposed project.

o. Utilities and Service Systems

Development facilitated by Alternative 2 would result in an increase in demand for water, wastewater, electricity, natural gas, telecommunications, and solid waste service. This alternative would introduce the same number of residents as the proposed project, which would result in similar demands for utilities and service systems in Cotati, including the existing sewer pipeline in Santero Way which would be upsized to meet minimum pipe diameter and capacity constraints as required by the proposed project. Impacts under Alternative 2 would be similar to the proposed project.

6.3 Alternative 3: Modified Density Allocation

6.3.1 Description

Alternative 3 would rezone parcels within the SWSP area and would rezone TOC parcels, similar to the proposed project. However, the density of parcels in the SWSP area would be reduced under this alternative, with the density of the TOC parcels increased. The intent of this alternative is to reduce traffic noise impacts on Santero Way that would occur with the proposed project. The commercial square footage would remain the same as the proposed project. The anticipated development scenario for Alternative 3 is provided in Table 6-3.

Table 6-3 Alternative 3 Development Projections

	Residential (Multi-Family) (units)	Commercial (sf)	Population Estimate ¹
SWSP Area	461	459,076	1,079
TOC Parcels	308	192,289	721
Total	769	651,365	1,800

sf = square feet

¹ Population estimates were calculated using the California Department of Finance (DOF) estimate of 2.34 persons per household for 2024 (DOF 2024).

Alternative 3 would meet all project objectives, similar to the proposed project.

6.3.2 Impact Analysis

a. Aesthetics

Development under Alternative 3 would be similar to the proposed project, although slightly reduced within the SWSP area and slightly increased on the TOC parcels. Under Alternative 3, the density of parcels in the SWSP area would be reduced from 535 units under the proposed project to 461 units. Whereas the density of the TOC parcels would be increased under Alternative 3 to 308 units compared to the 235 units under the proposed project. However, the total number of residential units and square footage of commercial development under Alternative 3 would be the same as the proposed project. The number of units reallocated under Alternative 3 would not result in significantly taller or denser development compared to the proposed project. Accordingly, impacts on scenic vistas, scenic resources, visual character or quality, and light and glare would be similar to the proposed project.

b. Air Quality

Alternative 3 would result in the same number of residential units and square footage of commercial development as the proposed project. Accordingly, temporary construction-related air quality impacts that result from grading and construction would be similar to the proposed project, though slightly increased within the TOC parcels compared to the proposed project. Since Alternative 3 would result in the same number of residential units and commercial development, operational VMT impacts would be similar to the proposed project. Alternative 3 would concentrate denser development on the TOC parcels and reduce development within the SWSP area, however, this would not significantly reduce VMT per capita. Overall, Alternative 3 would result in similar air quality emissions as the proposed project.

c. Biological Resources

Alternative 3 would result in the same number of residential units and square footage of commercial development as the proposed project. However, development would be slightly increased on the TOC parcels and slightly decreased within the SWSP area. Overall, the development facilitated by Alternative 3 would result in the same ground disturbance as under the proposed project, although slightly increased on TOC parcels and slightly reduced within the SWSP area. Ground disturbance would be generally similar to the proposed project and impacts on special-status species, riparian or sensitive habitats, protected wetlands, wildlife movement, conflicts with local ordinances, would be the same. Similar to the proposed project, Mitigation Measure BIO-1 would be required to reduce impacts to less than significant. Impacts would be similar to the proposed project.

d. Cultural Resources

Alternative 3 would result in the same number of residential units and square footage of commercial development as the proposed project. However, development would be slightly increased on the TOC parcels and slightly decreased within the SWSP area. Overall, the development facilitated by Alternative 3 would result in the same ground disturbance as under the proposed project, although slightly increased on TOC parcels and slightly reduced within the SWSP area. Ground disturbance would be generally similar to the proposed project, impacts on historic resources, archaeological resources, and human remains would be the same. Similar to the proposed project, Mitigation Measures CUL-1a, CUL-1b, CUL-2a, and CUL-2b would be required to

reduce impacts, although impacts to historic resources would remain significant and unavoidable. Impacts would be similar to the proposed project.

e. Geology and Soils

Alternative 3 would result in the same number of residential units and square footage of commercial development as the proposed project. However, development would be slightly increased on the TOC parcels and slightly decreased within the SWSP area. Overall, the development facilitated by Alternative 3 would result in the same ground disturbance as under the proposed project, although slightly increased on TOC parcels and slightly reduced within the SWSP area. Ground disturbance would be generally similar to the proposed project, impacts from earthquakes, seismic-related ground failure, erosion, expansive soils, and paleontological resources would be the same. Similar to the proposed project, Mitigation Measures GEO-9a and GEO-9b would be required to reduce impacts to less than significant. Impacts would be similar to the proposed project.

f. Greenhouse Gas Emissions

Alternative 3 would result in the same number of residential units and square footage of commercial development as the proposed project. Accordingly, temporary construction-related GHG emissions that result from grading and construction would be similar to the proposed project. Alternative 3 would reduce development within the SWSP area compared to the proposed project, which would allow for slightly reduced VMT per capita, and by association, slightly reduced GHG impacts. However, development would be increased on the TOC parcels which would slightly increase VMT and GHG impacts on those parcels. Accordingly, since Alternative 3 would result in the same number of residential units and commercial development, GHG impacts would be similar to the proposed project. Similar to the proposed project, Mitigation Measure GHG-1 would be required to reduce impacts, although impacts related to GHG emissions would remain significant and unavoidable. Impacts would be similar to the proposed project.

g. Hazards and Hazardous Materials

Alternative 3 would result in the same number of residential units and square footage of commercial development as the proposed project. However, development would be slightly increased on the TOC parcels and slightly decreased within the SWSP area. Overall, the development facilitated by Alternative 3 would result in the same ground disturbance as under the proposed project, although slightly increased on TOC parcels and slightly reduced within the SWSP area. Ground disturbance would be generally similar to the proposed project, impacts from hazardous materials transport, development on sites included on a list of sites pursuant to Government Code Section 65926.5, development near an airport, and impairment of an emergency plan would be the same. Similar to the proposed project Mitigation Measure HAZ-6 would be required and impacts would be less than significant following compliance with applicable hazardous materials laws and regulations. Impacts would be similar to the proposed project.

h. Hydrology and Water Quality

Alternative 3 would result in the same number of residential units and square footage of commercial development as the proposed project. However, development would be slightly increased on the TOC parcels and slightly decreased within the SWSP area. Overall, the development facilitated by Alternative 3 would result in the same ground disturbance as under the

proposed project, although slightly increased on TOC parcels and slightly reduced within the SWSP area. Ground disturbance would be generally similar to the proposed project and construction activities would occur on a similar scale as the proposed project. Therefore, impacts related to erosion, impervious surfaces, and flooding, would be the same within the SWSP area but reduced on the TOC parcels. Similar to the proposed project, development allowed under Alternative 3 would not substantially decrease groundwater supplies or violate water quality standards, following compliance with applicable laws and regulations. Impacts would be similar to the proposed project.

i. Land Use and Planning

Similar to the proposed project, Alternative 3 would not alter connectivity with adjacent areas or divide established communities, as it would encourage infill development within a previously developed area of Cotati. Alternative 3 would be consistent with the General Plan goals and policies included in Section 4.9, *Land Use and Planning*, similar to the proposed project. This alternative would also result in the future development of infill sites, and the intensity of development would be similar to the proposed project. Impacts would be similar than the proposed project.

j. Noise

Under Alternative 3, the amount of construction required would be similar to the proposed project, but development would be slightly increased on the TOC parcels and slightly decreased within the SWSP area. Accordingly, Alternative 3 would result in similar temporary construction-related noise, vibration, and building operation impacts. However, through decreased buildout in the SWSP area, Alternative 3 would reduce traffic noise impacts that would occur with the proposed project on Santero Way. Similar to the proposed project, Mitigation Measures N-1, N-2, N-3, and N-4 would be required to reduce impacts and would not result in a significant and unavoidable impact to noise. Overall, transportation impacts would be reduced compared to the proposed project.

k. Population and Housing

Like the proposed project, development facilitated by Alternative 3 would result in approximately 769 new dwelling units and approximately 1,800 new residents. However, unlike the proposed project, this population growth would be slightly increased on the TOC parcels and slightly decreased within the SWSP area. Similar to the proposed project, Alternative 3 would not contribute to unplanned growth and would also not displace people or housing. Impacts under Alternative 3 would be similar to the proposed project.

l. Public Services and Recreation

Development facilitated by Alternative 3 would increase the demand for fire protection, police protection, schools, parks, recreational facilities, and other public facilities. This alternative would introduce the same number of residents as the proposed project, which would result in similar demands for schools, parks, and recreational facilities in Cotati. Impacts under Alternative 3 would be similar to the proposed project.

m. Transportation

Alternative 3 would result in the same number of residential units and square footage of commercial development as the proposed project. Alternative 3 would reduce development within the SWSP area compared to the proposed project, which would allow for slightly reduced VMT per capita, and by association, slightly reduced GHG impacts. However, development would be

increased on the TOC parcels which would slightly increase VMT and GHG impacts on those parcels. Accordingly, since Alternative 3 would result in the same number of residential units and commercial development, VMT impacts would be similar to the proposed project. Alternative 3 would result in the same temporary construction-related traffic impacts within the SWSP area and reduced impacts on TOC parcels. Similarly, Alternative 3 would have a similar increase in transit demand as the proposed project. Impacts would be similar to the proposed project, except on fewer sites.

n. Tribal Cultural Resources

Alternative 3 would result in the same number of residential units and square footage of commercial development as the proposed project. However, development would be slightly increased on the TOC parcels and slightly decreased within the SWSP area. Overall, the development facilitated by Alternative 3 would result in the same ground disturbance as under the proposed project, although slightly increased on TOC parcels and slightly reduced within the SWSP area. Ground disturbance would be generally similar to the proposed project, thus impacts on tribal cultural resources would be the same. Similar to the proposed project, Mitigation Measure TCR-1 would be required to reduce impacts. Impacts would be similar to the proposed project.

o. Utilities and Service Systems

Development facilitated by Alternative 3 would result in an increase in demand for water, wastewater, electricity, natural gas, telecommunications, and solid waste service. This alternative would introduce the same number of residents as the proposed project, which would result in similar demands for utilities and service systems in Cotati. While Alternative 3 would reduce development within the SWSP compared to the proposed project, it would still require the existing sewer pipeline in Santero Way to be upsized to meet minimum pipe diameter and capacity constraints. Impacts under Alternative 3 would be similar to the proposed project.

6.4 Alternatives Considered but Rejected

The *CEQA Guidelines* state that an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination (*CEQA Guidelines* Section 15126.2[c]).

The City considered an alternative that would reduce density across both the SWSP area and TOC parcels. This alternative would not meet the TOC density requirements. For this reason, this alternative was rejected.

Another alternative considered included an alternative project location which did not include the TOC parcels identified within the proposed project. However, no additional parcels were identified in the TOC area which could reasonably accommodate more development. This is mostly in part because a majority of TOC parcels are developed with existing residential uses already and are unlikely to be redeveloped. For this reason, this alternative was rejected.

6.5 Environmentally Superior Alternative

CEQA requires identification of the environmentally superior alternative among the alternatives to the proposed project. The environmentally superior alternative must be an alternative that reduces

some of the project's environmental impacts, regardless of the financial costs associated. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project. Table 6-4 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed project for each of the issue areas studied.

Based on the analysis of alternatives in this section, the No Project Alternative is the environmentally superior alternative as it would either avoid or lessen the severity of most impacts of the proposed project. Though the No Project Alternative would still result in significant and unavoidable cultural resources impacts. Because the No Project Alternative would not generate new population within the city above existing buildout projections, impacts to aesthetics, air quality, geology and soils, greenhouse gas emissions, hydrology and water quality, noise, public services and recreation, transportation, and utilities and service systems would also be eliminated. In addition, significant but mitigable impacts related to biological resources, hazards and hazardous materials, land use and planning, population and housing, and tribal cultural resources would be similar to the proposed project. However, this alternative would not meet the project objectives, as it would not increase opportunities for residential development, smaller-scale commercial development, or mixed-use development; expand community spaces; or meet the TOC station area requirements.

If the No Project Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (*CEQA Guidelines* Section 15126.6[e]). Of the other alternatives evaluated in this EIR, Alternative 3 (Modified Density Allocation) would be environmentally superior. Because this alternative would generate fewer residents within the SWSP area, impacts to traffic noise would also be reduced compared to the proposed project and would be less than significant with the implementation of mitigation. In addition, because this alternative would result in the same number of residential units and square footage of commercial development as the proposed project, it would result in similar impacts to aesthetics, air quality, biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services and recreation, transportation, tribal cultural resources, and utilities and service systems. However, the significant and unavoidable impacts to cultural resources and greenhouse gas emissions would remain significant and unavoidable under Alternative 3. Furthermore, this alternative would meet all project objectives, similar to the proposed project. Therefore, Alternative 3 would be the environmentally superior alternative.

Table 6-4 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Station-Oriented Density	Alternative 3: Modified Density Allocation
Aesthetics	Less than Significant	+	-	=
Air Quality	Less than Significant	+	=	=
Biological Resources	Less than Significant with Mitigation Incorporated	=	=	=
Cultural Resources	Significant and Unavoidable	=	=	=
Geology and Soils	Less than Significant with Mitigation Incorporated	+	=	=
Greenhouse Gas Emissions	Less than Significant with Mitigation Incorporated	+	=	=
Hazards and Hazardous Materials	Less than Significant with Mitigation Incorporated	=	=	=
Hydrology and Water Quality	Less than Significant	+	=	=
Land Use and Planning	Less than Significant	=	=	=
Noise	Significant and Unavoidable	+	=	+
Population and Housing	Less than Significant	=	=	=
Public Services and Recreation	Less than Significant	+	=	=
Transportation	Less than Significant	+	=	=
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	=	=	=
Utilities and Service Systems	Less than Significant	+	=	=
Total		9 +	0 +	1 +
		6 =	14 =	14 =
		0 -	1 -	0 -

+ Superior to the proposed project (reduced level of impact)

- Inferior to the proposed project (increased level of impact)

= Similar level of impact to the proposed project

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5 Other CEQA Required Discussions

No in-text citations are used in this section.

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