ENVIRONMENTAL REVIEW

PURSUANT TO CALIFORNIA PUBLIC RESOURCES CODE CEQA GUIDELINES SECTION 15183

Cotati Village Community Two Project

LEAD AGENCY:

CITY OF COTATI
COMMUNITY DEVELOPMENT DEPARTMENT
201 WEST SIERRA AVENUE
COTATI, CA 94931

PREPARED BY:

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JULY 2024

M-GROUP

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COTATI VILLAGE COMMUNITY TWO

Project Title:	Cotati Village Community Two
Lead Agency:	City of Cotati: Community Development Department 201 West Sierra Avenue Cotati, CA 94931
Contact Person:	Autumn Buss, Associate Planner 707238-5276
Project Location:	7515 Alder Avenue and 8145 Gravenstein Hwy, Coati, CA (APN:144-040-011, 144-040-021) City of Cotati, Sonoma County, California
Project Sponsor(s)/Owners:	Collin Monahan 116 Associated Investors, LLC 1101 5th Avenue, Ste. 300 San Rafael, CA 94901 collin@monahanpacific.com 415-456-0600
General Plan Designation:	General Commercial (GC)
Zoning:	Commercial, Gravenstein Corridor (CG)
Description of project:	The proposed project includes the construction of a mixed-use multifamily development with 126 apartments (including 13 affordable units) in two four-story buildings and a separate 2,250 sf café on a 5.62-acre parcel. Site improvements include landscaping, lighting, parking, common open space and amenities, and pedestrian and bicycle paths. The project includes frontage improvements to SR-116 and Alder Avenue.
Surrounding land uses and setting; briefly describe the project's surroundings:	The project site is surrounded by land designated as General Commercial to the north, east, south, and west. Medium Density Residential is located northeast of the project site and a mixed-use project (Cotati Village Community One) has been approved for the property directly east of the project site across Alder Avenue.
Other public agencies whose approval is required:	U.S. Army Corps of Engineers, Regional Water Quality Control Board, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, and Caltrans.
Have California Native American tribes	In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the Federated Indians of Graton Rancheria

traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?	(FIGR) on August 23, 2023, which included a brief description of the proposed project and its location, the City of Cotati's contact information, and a notification that FIGR had 30 days to request consultation pursuant to this section. The City of Cotati received a response requesting consultation under PRC Section 21080.3.1(b)(2) from the FIGR on September 7, 2023. The City of Cotati entered into consultation with FIGR and provided requested information on October 5, 2023. Subsequent correspondence resulted in a request from the Tribe to review the CEQA Analysis, which was provided to the Tribe on June 10, 2024 and no response was received.

COTATI VILLAGE COMMUNITY TWO

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ACRONMYMS AND ABBREVIATIONS

APN	Assessor Parcel Numbers
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CRHR	California Register of Historical Resources
CRPUSD	Cotati-Rohnert Park Unified School District
CTS	California Tiger Salamander
dBA	A-weighted Decibel
DMA	Drainage management area
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
EIR	Environmental Impact Report
EVA	Emergency vehicle access
FIGR	Federated Indians of Graton Rancheria
GHG	Greenhouse Gas
gpd	Gallons per day
LID	Low Impact Development
LWWTP	Laguna Wastewater Treatment Plant
MBTA	Migratory Bird Treaty Act
mph	Miles per hour
NPDES	National Polluant Discharge Elimination System
NAHC	Native American Heritage Commission
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OEHHA	California Office of Environmental Health Hazards Assessment
PRC	Public Resources Code
RCPA	Regional Climate Protection Agency
ROG	Reactive Organic Gas
RWQCB	Regional Water Quality Control Board
SCH	State Clearinghouse
SMART	Sonoma-Marin Area Rail Transit
SR	State Route
SRPCS	Santa Rosa Plain Conservation Strategy
SSBP	South Sonoma Business Park
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCR	Tribal Cultural Resource
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
$\mu G/M^3$	Micrograms Per Cubic Meter

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1. INTRODUCTION

This California Environmental Quality Act (CEQA) Analysis evaluates consistencies with the City's 2013 General Plan EIR to identify any new or more significant impacts from the proposed project, which includes an entitlement for Design Review and Tree Removal to construct a mixed-use residential development (the "Project"),with 126 apartments (including 13 affordable units) in two four-story buildings and a e 2,250 sf café located in a third one-story building, on a 5.62-acre parcel. The project is taking advantage of the State Density Bonus program to achieve the proposed number of residential units. Site improvements include landscaping, lighting, parking, common open space and amenities, and pedestrian and bicycle paths (the "Project").

1.1. OVERVIEW OF CEQA ANALYSIS

This CEQA Analysis has been prepared by the City of Cotati, as the lead agency in full accordance with the procedural and substantive requirements of CEQA, CEQA Guidelines, and the City of Cotati local CEQA provisions.

This CEQA Analysis uses CEQA Guidelines Sections 15183, which provides a streamlined review of the Project by tiering from the program level analysis prepared for the Cotati General Plan and its certified Environmental Impact Report (EIR), thereby focusing the analysis to potential impacts of the project relative to the impacts analyzed in the program level EIR. Section 15183 of the CEQA Guidelines mandates that projects which are determined to be consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. The analysis provided herein tiers from the program level analysis prepared for the 2013 City of Cotati General Plan and its EIR (SCH No. 2013082037), which was certified in 2015. This CEQA Analysis describes the proposed project and its environmental setting, including the project site's existing conditions and applicable regulatory requirements, and provides an assessment of the project's consistency with the City of Cotati General Plan. All General Plan policies adopted as mitigation apply to the project as described herein.

1.2. PURPOSE AND SUMMARY OF THIS CEQA DOCUMENT

The purpose of this document is to evaluate environmental effects of the Project under CEQA. This document considers the specific environmental effects of the Project as proposed and whether such impacts were adequately addressed in the City of Cotati 2013 General Plan EIR. The Project is required to incorporate or comply with all applicable mitigation measures identified in the 2013 General Plan EIR, uniformly applied development standards, and environmental conditions of approval. Section 7 of this document contains environmental conditions of approval imposed on the project to ensure implementation of mitigation measures from the 2013 General Plan EIR which have been identified to avoid, reduce, or offset potential environmental impacts. As presented herein, the Project is consistent with the General Plan and its certified EIR and qualifies for a General Plan Exemption pursuant to CEQA Guidelines Section 15183.

1.3. PUBLIC REVIEW PROCESS

The project has been analyzed pursuant to CEQA Guidelines Section 15183 and does not require circulation for public review and comment. Nonetheless the City will make this CEQA Analysis available as part of the public hearing process, which requires approval from the City Council for Design Review

and Tree Removal. Prior to the City Council public hearing, the project will be considered for recommendation to the City Council by the Planning Commission at a public hearing.

2. PROJECT DESCRIPTION

2.1. BACKGROUND

The Project site is located at the northwest corner of Alder Avenue and California State Route 116 (SR-116). The site consists of two parcels. On November 12, 2019, the City adopted an Initial Study/Mitigated Negative Declaration (IS/MND) for a project on the same site. The scope of the 2019 project included a text amendment to Section 17.22.020 of the Cotati Municipal Code to allow Residential Care Facilities for the Elderly (RCFE) within the Commercial, Gravenstein Corridor (CG) Zoning District, subject to the approval of a Use Permit; construction of an Assisted Living Facility, Memory Care Facility, and commercial building, a commercial cannabis permit to operate the dispensary, a lot line adjustment, and frontage improvements along SR-116 and Alder Avenue.

Since adoption of the 2019 IS/MND, the following activities were completed on the project site:

- Lot line adjustment
- Demolition of an old tavern and other structures
- Construction of retail along SR-116
- Establishment of the Cannabis Dispensary in a portion of the retail space
- Occupancy of the balance of the retail space by Acre Pizza restaurant
- Frontage improvements along a portion of Alder Ave

To date, all development has taken place on the portion of the site with frontage along SR-116. A total of approximately 7,822 sf of commercial space and ancillary improvements including parking, landscaping, and lighting, occupy the southernmost portion of the project site. The balance of the project site remains mostly undeveloped as the Residential Care Facilities for the Elderly was never constructed. The Project Site contains 41 trees including native oak species, overhead power poles and utilities, existing wells, and an existing vacant house with auxiliary structures.

On March 5, 2024, the applicant submitted a complete application for the currently proposed project.

2.2. PROJECT LOCATION

Cotati is located in central Sonoma County along the Highway 101 corridor approximately 8 miles south of Santa Rosa and 40 miles north of San Francisco. It is situated in the southern region of Sonoma County in a low-lying topographical area known as the Santa Rosa Plain. The City has a population of approximately 7,584[1] within approximately 1,217 acres of City-incorporated land.

*The Project site is located in the western portion of the City of Cotati, in the County of Sonoma (***Figure 1: Regional Location**

). Specifically, the Project site is located at the northwest corner of the intersection of SR-116 and Alder Avenue and includes two contiguous parcels (APNs 144-040-011 and 144-040-021).

[1] US Census Bureau, City of Cotati, https://data.census.gov/cedsci/all?q=cotati, accessed May 23, 2022.

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

As seen in (Error! Reference source not found.), the Project site is comprised of two contiguous parcels that occupy approximately 5.62 acres. The smaller parcel, located adjacent to SR-116 has been developed with existing commercial retail uses, parking, and associated utilities.

The Project site is bounded by SR-116 to the south and Alder Avenue to the east. A vacant site is located to the east of Alder Ave. An undeveloped parcel and a vehicle storage yard border the site to the north. To the south of the property, across SR-116, is Shamrock Materials, Inc., a business specializing in stone and concrete building supplies. The Cotati Large Animal Hospital and Cotati Small Animal Hospital are located directly west of the project site.

Land uses surrounding the subject property include ruderal annual grassland to the east and north and an existing residential townhouse development (Cotati Cottages subdivision) to the northeast. A multi-family housing development (Cotati Village Community One, 177 units) has been approved for the vacant parcel east of the site. A multi-family residential development (Redwood Row, 168 units) has also been proposed for a vacant parcel on the east side of the Cotati Village Community One site.). Additionally, the City of Cotati is working to improve SR-116 with a realignment of West Cotati Avenue and widening of SR-116 with pedestrian facilities between Alder Ave. and Redwood Drive. This project is currently in the design phase.

The Project site is located approximately 1.5 miles west of the Sonoma-Marin Area Rail Transit (SMART) Cotati station and the SMART corridor, approximately 0.75 miles from the Cotati Hub bus station which serves Sonoma County Transit and Golden Gate Transit, and is directly adjacent to the SR-116 and Alder Avenue bus stop for bus route 26 operated by Sonoma County Transit. The Project site is bounded by SR-116 to the south and access to Highway 101 is located approximately 0.25 miles east of the Project site.

Due to past cultivation of lavender fields and grading disturbance on the site, very few native plant species remain. The remaining native plant species found in the ruderal vegetation community include California poppy (*Eschscholzia californica*), Spanish clover (*Acmispon americanus ssp. americanus*), willow herb (*Epilobium brachycarpum*), cleavers (*Galium aparine*), summer cottonweed (*Epilobium brachycarpum*) and creeping wildrye (*Elymus triticoides ssp. triticoides*). Weed abatement and plowing was performed from 2009 to 2012 on the project site, but annual disking ceased when the tenant vacated the property in 2012. In mid-January 2018, as requested by the Rancho Adobe Fire District to minimize wildland fire hazards, the dry grass and weeds were removed, and the property disked. The weed abatement conducted in January 2018 did not impact the onsite sensitive biological resources including seasonal wetlands. The ruderal fields are disked annually for fire control practices.

One seasonal wetland (0.06 acre) occurs in a slight topographic low area in the northern portion of the project site. Under current federal regulations, this would be considered an isolated wetland and NOT subject to the U.S. Army Corps of Engineers (Corps) jurisdiction pursuant to Section 404 of the Clean Water Act. However, because the delineation map was completed and accepted by the Corps under the previous interpretation, the Corps will honor the approved delineation map and the wetland is subject to U.S. Army Corps of Engineers jurisdiction. This low area remains

saturated/inundated throughout the winter as indicated by the dominance of hydrophytic vegetation, presence of hydric soils and indicators of wetland hydrology (i.e. presence of standing water, saturation and oxidized rhizospheres). During large storm events, this seasonal wetland overflows and conveys water overland east to the drain inlet along Alder Avenue where it enters the City storm drain system. Formal rare plant surveys were conducted on the project site in 2015, 2016, 2019, and 2024. No special status plant species have been observed onsite.

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

There are 41 existing trees on the Project site. They include Valley Oak, Western Cottonwood, Black Oak, Monterey Pine, Coast Redwood, Mexican Fan Palm, and Silver Maple.

2.3. GENERAL PLAN AND ZONING

The City of Cotati General Plan identifies the City's vision for the future and provides a framework that will guide decisions on growth, development, and conservation of open space and resources in a manner consistent with the quality of life desired by the City's residents and businesses. To ensure that this desired vision is realized, the General Plan has been designed to be internally consistent and cross-referenced with other documents, including the City's Land Use Code.

The Project site has a General Plan land use designation of General Commercial (GC) (**Figure 4: General Plan Land Use**). The surrounding land uses are designated General Commercial to the north, south, east, and west, and Medium Density Residential (MDR) to the northeast.

The City of Cotati Land Use Code implements the General Plan. Several different zoning districts are identified in the Land Use Code that are intended to, among other things, provide for a wide range of uses and implement the City's vision to conserve open space and resources. The project site is zoned Commercial, Gravenstein Corridor (CG) per the City of Cotati Zoning Map (**Figure 3: Zoning**).

2.4. PROJECT DESCRIPTION

The project involves tree removal, demolition of existing buildings and structures onsite, and the removal of overhead power poles and utilities to accommodate the proposed development.

The Proposed Project would construct two four-story residential buildings containing 126 apartments (including 13 affordable units) with a combined floor area of 141,680 square feet. The Project also includes a 2,250 square foot café in a third one-story building. Additional site development includes approximately 41,894 square feet of pathways and patios, approximately 76,531 square feet of paved driveways and 153 new off-street parking spaces, a woonerf multimodal street, and approximately

46,078 square feet of new landscaping. The project would provide an additional 9 on-street parking spaces on Alder Avenue and 33 new off-street bicycle parking spaces. The Project will also utilize 44 existing off-street parking spaces. A total of 14,243 square feet of central green, oak grove, and playgrounds would provide common open space for the development. Additional development includes on and offsite utility improvements, frontage improvements to SR-116, and a Class I multimodal path along the west side of the project connecting to SR-116 as required by the City of Cotati. **Figure 6: Site Plan** shows the locations of proposed development onsite and the area of frontage improvements along SR-116.

New Structures

The project includes construction of three new buildings including two four-story residential buildings that would contain a total of 126 dwelling units in 1-,2-, and 3-bedroom configurations. Building A would have a floor area of 67,000 square feet and would be located on the western portion of the site and contain 59 units. Building B would have a floor area of 74,080 square feet and be located along the northern portion of the site and contain 67 units. The Project includes waivers and concessions in compliance with State Density Bonus Law in California Government Code §65915 which allows the project to:

- Reduce the woonerf requirement,
- Increase the maximum building height,
- Reduce residential side yard setback requirements,
- Reduce width of offer of dedication of land for the future street along the western property line from 34' to 28' wide,
- Eliminate the requirement that Multifamily projects fronting on an existing or proposed public street shall orient the buildings to the street with individual entries, porches, and landscaping facing the street,
- Modify parking requirements to reduce overall number of parking spaces required and to count on-street parking spaces toward the project,
- Allow shared use of the commercial parking area so that residents have access to use some of the commercial parking spaces,
- Reduce the non-residential space requirement for mixed use projects from 35,420 SF (25% of project residential GSF) to 10,072 SF (includes 7,822 SF of existing retail) in order to reduce the self-evident costs that would otherwise be required to construct an additional 25,348 square feet of commercial space, and
- Eliminate the requirement for 80% of the length of the street facing facades to abut the build-to line.

Both buildings will have a maximum height of 47 feet to the top of the peaked roofs that will articulate the edges of the building. The main roof will be 42 feet high. Building A would be oriented to Building B at a 90-degree angle and will be separated by parking and landscaping.

The Café building is proposed to be 2,250 sf located in the southeastern portion of the site, proximate to the existing commercial uses and the woonerf and central open space area serving the residential buildings.

Access and Parking

The existing access point off of Alder Avenue to the existing commercial uses onsite would be retained. New access to the residential portion of the site would be provided via a varying 20- to 26-foot-wide new one-way driveway that would connect to Alder Avenue with an entrance at the north end of the

project and an exit at the south end, providing a loop configuration. This new driveway would provide access to 153 new parking spaces located around the loop drive. The new site south exit closest to SR-116 would include a woonerf, a multi-modal street which incorporates traffic calming measures and accommodates pedestrians, bicycles, auto traffic, and parallel car parking. Pedestrian access would also be accommodated throughout the site via dedicated pedestrian walkways.

The project includes improvements to Alder Avenue along the site's frontage consisting of a 5-foot grind and overlay to a segment of Alder Avenue, construction of an 11-foot travel way, 4.5-foot-wide bike lane, a 7-foot-wide area for on street parallel parking, and a 12-foot-wide sidewalk. The 12-foot-wide sidewalk is proposed along the site frontage to Alder Avenue and connects to internal sidewalks at the perimeter of the parking area and to the multi-use path along SR-116

On the site's western boundary, the project includes a 28-foot-wide dedication of land for the potential future construction of a N-S roadway, consistent with the City's 2013 General Plan. The project proposes to construct a 10-foot-wide Class I multi-use path along the site's western boundary, which would connect to the proposed Class I multi-use path along the site's frontage to SR-116.

West Cotati Avenue and State Route 116 Realignment

West Cotati Avenue currently terminates at SR-116 approximately 375 feet southeast of the Project site. The General Plan anticipated realignment of West Cotati Avenue and SR-116 as new development would require an improved signalized intersection. A project to re-align West Cotati Avenue to improve vehicle, bicycle and pedestrian safety, signalize the intersection, and widen the highway to accommodate bicycle and pedestrian facilities is in the planning phase and undergoing design by the City of Cotati. The implementation of the West Cotati Ave Realignment project is expected to build out incrementally as vacant/underutilized parcels along SR-116 are developed and when the City secures funding to install improvements. The site frontage improvements include a Class I multi-use path that would tie into the City's proposed facility improvements along SR-116.

Alder Avenue

In the future, consistent with the City of Cotati's General Plan, Alder Avenue may be inaccessible from SR-116 and instead may terminate in a cul-de-sac. The project includes plans for the future dedication of land along Alder Avenue to accommodate the planned future construction of the Alder Avenue cul-de-sac. In the future, if Alder Avenue transitions to a cul-de-sac, site access would be provided via construction of a new public street (north-south street) adjacent to the property's western boundary or via Batchelor and Ford Lane to the east. Construction of the cul-de-sac would result in the removal of approximately 9 parking spaces from the proposed off-site parking. The future north-south street is not proposed for construction at this time but is planned to be signalized at its intersection with SR-116 in the future, once developed. The project provides adequate right-of-way dedication to accommodate planned future improvements including the Alder Avenue cul-de-sac, the future north-south street, and the planned future widening of SR-116.

Landscaping and Lighting

The proposed Landscape Site Plan includes a mix of trees, shrubs, groundcover and grasses. Trees and other landscaping are proposed along the perimeter of the project site, throughout the parking lot, between buildings, and within the interior courtyards (see Sheet L.1: Preliminary Landscape Plan, Sheet L2: Preliminary Landscape Notes, and Sheet L3: Central Green Preliminary Planting Plan). Landscaping will feature drought tolerant plants and a high efficiency irrigation system, including

weather-based controllers. Landscape areas will establish buffers, provide shading, and will serve as stormwater detention facilities.

The project proposes the removal of several existing native oak trees from the site, which requires a Tree Removal permit approved by the City Council and mitigation of removed trees. The proposed Landscape Plan includes a number of mitigation oak trees, and the applicant will also be required to pay an in-lieu fee for the balance of the mitigation trees that cannot be accommodated on the site.

Proposed lighting includes: streetlights along the project site's frontage with SR-116 and Alder Avenue (City of Cotati standard light); exterior 14-foot-tall pole mount LED lighting along the woonerf, driveway, and parking areas. Bollard lighting at a height of 3.5 feet would be provided around the central green and along internal pedestrian pathways except for the multi-use path along the western edge of the property which would be lit by 10-foot-tall pole mount LED lights ((see Sheet LT1.1: Preliminary Lighting Plan).

Water Supply

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

Wastewater

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

Solid Waste

Two covered solid waste containment areas are proposed for the residential units; both abutting the northern property line and located within the setback. Each solid waste containment area would include four dumpsters, one/two for trash/landfill materials, one/two for recyclable materials, and one for organics/yard waste, and would be enclosed by 6-foot-high concrete masonry unit walls with metal gates and an eight-foot-tall metal roof on posts. The new commercial space, occupied by the café, will utilize the trash receptacles for the existing commercial along SR-116.

Storm Drainage Infrastructure

Onsite runoff will flow overland to a series of proposed Low Impact Development Best Management Practices (LID BMP's) with underground volume capture to provide treatment before entering the underground drainage system. Runoff from the west half of Alder Avenue will first enter tree wells with volume capture through curb openings. In addition to removing pollutants, these features will also reduce the amount of runoff by capturing and infiltrating storm water on-site in underground volume capture before entering the storm drain. All landscape-based LID BMPs will have overflow inlets 3 inches above the flowline to adequately intercept and capture trash and particles as small as 100 microns.

Site Preparation and Construction

For the purpose of this analysis, it is assumed that site preparation and construction would occur within an approximately 12-month period. Site preparation would initiate with the removal of two existing structures (a single-family residence and detached garage), vegetation, and five trees, including three heritage native oaks, and two abandoned wells and a well house.

A Tree Inventory Report was prepared by Horticultural Associates on April 30, 2024 (**Appendix C**). The Existing Site and Demolition Plan identifies trees that will remain and those proposed for removal (Sheet C1 of Plans Submitted February 2024). Of the 41 existing trees onsite, 36 would remain.

The project proposes to cut approximately 1,420 Cubic Yards of earth and require approximately 2,370 cubic yards of fill that would disturb approximately 4 acres of the site. Following completion of grading activities, infrastructure improvements and building foundations would be constructed. Foundations are proposed to be slab-on-grade. Utilities, storm drains and catch basins would be installed and buildings erected. New driveways, sidewalks, curbs and gutters, striping, landscaping, and signage would be installed.

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

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

Required Discretionary Actions

The applicant is requesting approval of a Design Review application to construct a mixed-use development, which consists of a total of three buildings that will accommodate 126 residential units and 2,250 square feet of commercial space. The Project applicant has applied to the City of Cotati for the following entitlements:

- Design Review
- Tree Removal Permit

In addition, the Project will be required to obtain all ministerial permits from the City as required to construct the Project, e.g., building permits, grading permits, occupancy permits, following approval of entitlement applications.

Other Public Agency Review

In addition to the approval necessary from the City of Cotati as the lead agency, the Cotati Village Community Two Project may require the following approvals from agencies other than the City:

- Sonoma Water (formerly Sonoma County Water Agency) – For review, approval and acceptance of the Project's Stormwater Management Plan
- Caltrans Encroachment Permit
- Regional Water Quality Control Board
- California Department of Fish and Wildlife
- United States Army Corps of Engineers
- County of Sonoma Environmental Health (well removal)

California Native American Tribal Consultation

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

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

In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the FIGR on August 23, 2023, which included a brief description of the proposed project and its location, the City of Cotati's contact information, and a notification that the Federated Indians of Graton Rancheria has 30 days to request consultation pursuant to this section.

The City of Cotati received a response requesting consultation under PRC Section 21080.3.1(b)(2) from the FIGR on September 7, 2023. The City of Cotati entered into consultation with FIGR and provided requested information on October 5, 2023. Subsequent correspondence resulted in a request from the Tribe to review the CEQA Analysis, which was provided to the Tribe on June 10, 2024. No further action was requested.

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Cotati Village Community 2 | Cotati, CA

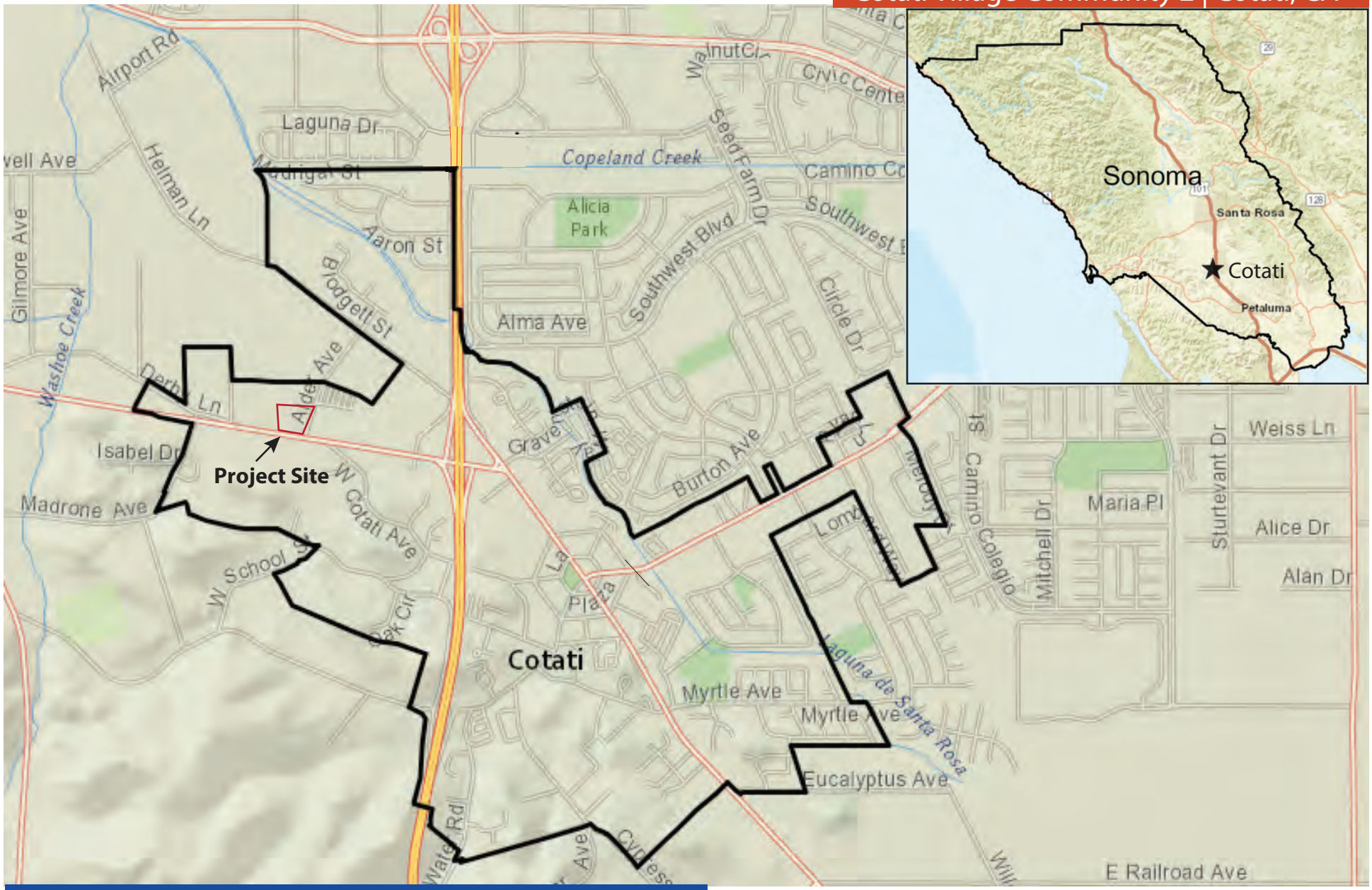

Figure 1: Regional Map

Data Source: ESRI, CalFire, City of Cotati

Project Site

Cotati City Limits

Sonoma County

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Figure 2: Project Vicinity Map

Project Site

City Limits

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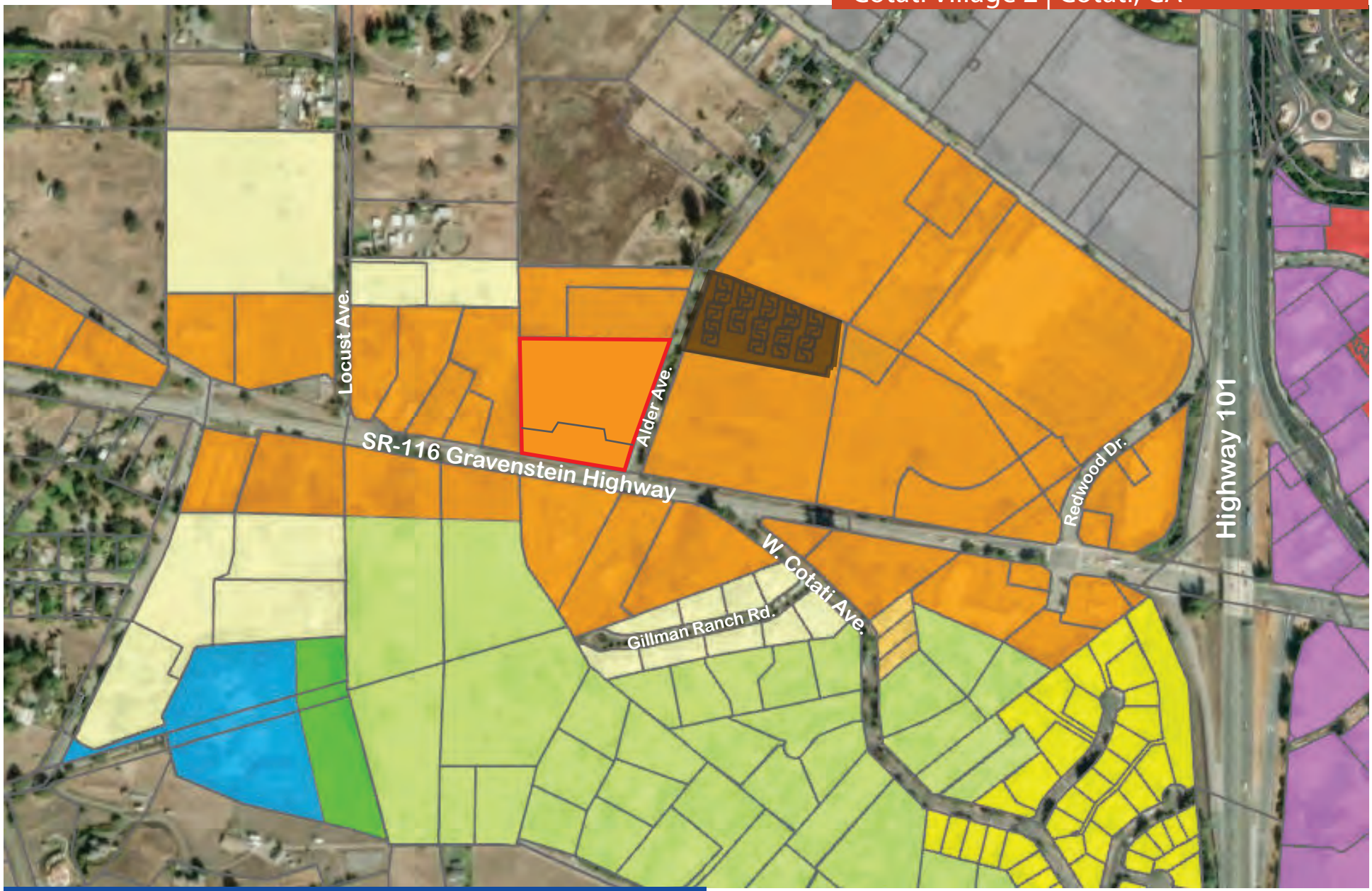

Figure 3: Zoning Map

Data Source: ESRI, City of Cotati

- Project Site
- Neighborhood Low Density
- Residential Very Low Density
- Rural Residential
- Neighborhood, Medium Density
- Neighborhood, Urban
- Commercial General- Gravenstein Highway
- Commerical/Industrial
- Open Space
- Public Facilities

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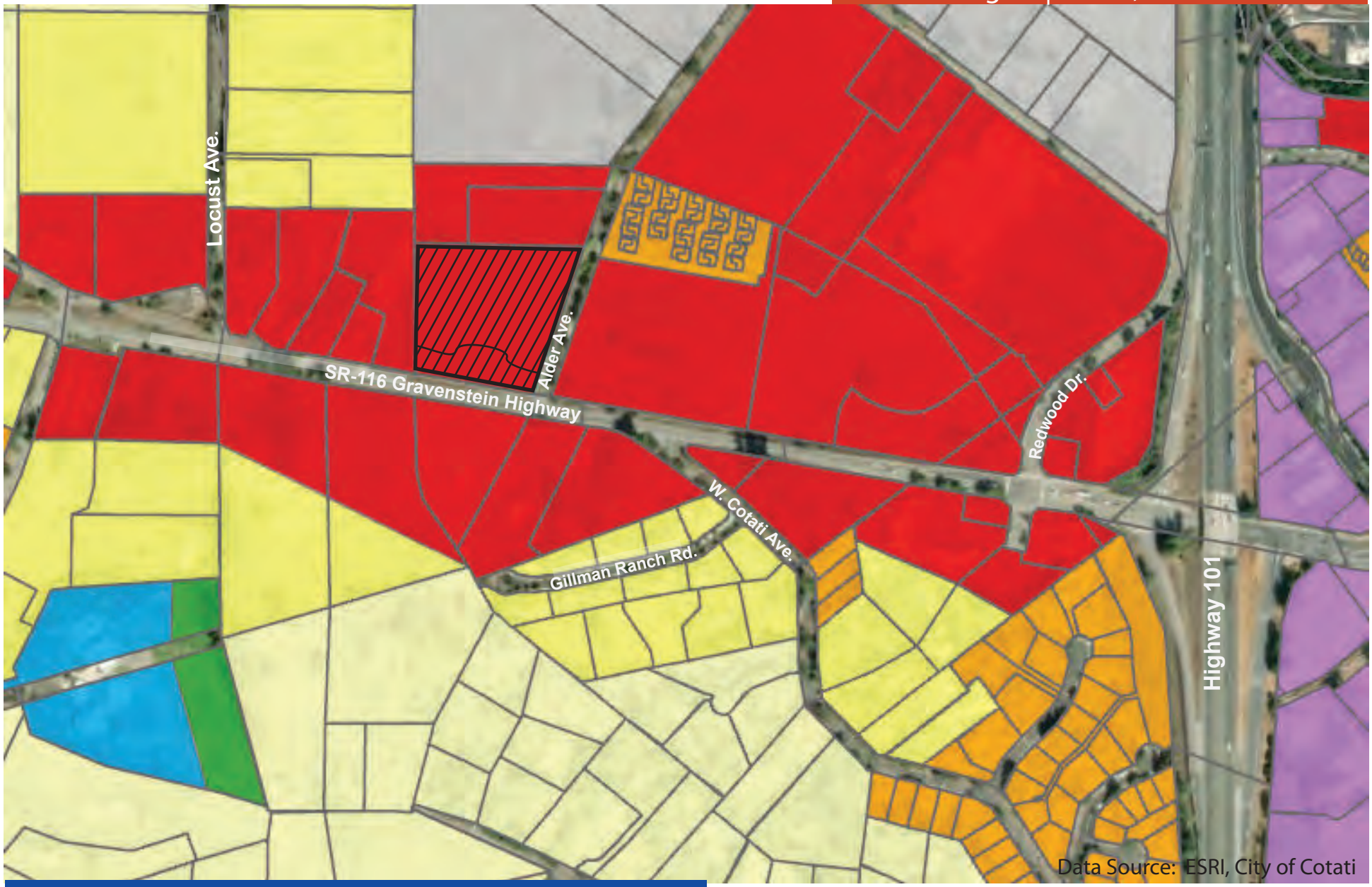

Figure 4: General Plan Map

Project Site

General Commercial

Low/Medium Density Residential

Low Density Residential

Rural Residential

Public Facilities

Open Space

Commercial Industrial

Specific Plan

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Figure 5: Project Site Plan

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3. RELEVANT CITY PLANNING DOCUMENTS

3.1. CITY OF COTATI GENERAL PLAN

The 2013 City of Cotati General Plan was adopted in 2015 and identifies the City's vision for the future and provides a framework that will guide decisions on growth, development, and conservation of open space and resources in a manner consistent with the quality of life desired by the City's residents and businesses. To ensure that this desired vision is realized, the General Plan has been designed to be internally consistent and cross-referenced with other documents, including the City's Land Use Code. The Cotati General Plan was adopted by City Council on March 24, 2015 by Resolution Number 2015-12.

The Cotati General Plan is intended for a broad range of applications, including:

- Informing discretionary activities carried out by City Council and Planning Commission;
- Program and project development and implementation carried out by City staff;
- Preparation of project proposals by the development community; and
- Facilitation of public understanding of future development in Cotati and the City's vision, goals, and priorities.

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

3.2. CITY OF COTATI GENERAL PLAN EIR

The City of Cotati 2013 General Plan EIR (SCH No. 2013082037) was certified on March 24, 2015 by Resolution Number 2015-11. The 2013 General Plan EIR analyzed the following environmental resource topics: aesthetics and visual resources; air quality; biological resources; cultural resources; geology and soils; greenhouse gases and climate change; hazards; hydrology and water quality; land use, agriculture, and population; noise; public services and recreation; transportation and circulation; and utilities. The EIR analyzed two buildout scenarios. One evaluated maximum projected development within the City Limits, and the other evaluated the maximum projected development that could occur within the existing City Limits and the City's Sphere of Influence.

The 2013 General Plan EIR reviewed potentially significant environmental effects resulting from plan implementation and developed measures and policies to mitigate impacts to less-than-significant levels. Nonetheless, significant and unavoidable impacts were determined to occur under the General Plan. Therefore, the City adopted a statement of overriding considerations, which balance the merits of approving the plan despite the significant environmental effects. The effects identified as significant and unavoidable in the 2013 General Plan EIR include:

Aesthetics

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

Noise

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

Traffic

- Impact 3.12-1: Acceptable traffic operation at the study intersections and roadway segments controlled by the City of Cotati, though the ability to fully fund all identified improvements is uncertain.
- Impact 3.12-2: Acceptable traffic operation on Gravenstein Highway, though the funding and timing of improvements needed to accommodate regional and local growth on the highway is uncertain.
- Impact 3.12-3: Unacceptable operation on US 101 freeway facilities.
- Impact 4.13: Cumulative Impact on the Transportation Network.

Utilities

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

Other

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

The Draft EIR for the Cotati General Plan (SCH No. 2013082037) was prepared in September 2014. The Draft EIR, together with the Response to Comments Document dated November 2014, constitute the Final EIR for the Cotati General Plan. A copy of the City of Cotati's 2013 General Plan EIR is available at the Community Development Department, 201 West Sierra Avenue, Cotati, California 94931, during normal business hours and online at www.cotaticity.org.

3.3. CITY OF COTATI ZONING CODE

The City of Cotati Land Use Code implements the goals and policies of the Cotati General Plan by classifying and regulating the uses of land and structures within the City of Cotati. In addition, the Land Use Code is adopted to protect and promote the public health, safety, and general welfare of residents, and preserve and enhance the aesthetic quality of the city. The Land Use Code is provided within Title 17 (Land Use) of the City of Cotati Municipal Code.

The Project site is zoned Commercial, Gravenstein Corridor (CG), which permits a maximum residential density of 84 units at the Project site (15 units per acre). The Project proposes 84 base units with a reservation of 15% of units for very low-income households (13 units), and requests a 50% density bonus (42 units) for 126 proposed residential units.

4. APPLICABLE CEQA PROVISIONS AND FINDINGS

The following discussion presents the relevant provisions of CEQA with which the proposed project complies. It provides an overview of the Community Plan Exemption. A description of how the project

complies with each provision is also provided. Finally, this section concludes with the CEQA finding and determination that the project is exempt from further environmental review.

4.1. General Plan/Community Plan Exemption (CEQA Guidelines Section 15183)

California Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified.

Section 15183 (a) "mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies."

Section 15183(b) of the CEQA Guidelines specifies that "in approving a project meeting the requirements of Section 15183, examination of environmental effects:

As prescribed in Section 15183(b), a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

1. Are peculiar to the project or the parcel on which the project would be located,
2. Were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent,
3. Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or
4. Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

Section 15183(c) specifies that impacts which are not peculiar to the project site which have been addressed as a significant effect in the prior EIR or can be substantially mitigated by applying uniformly applied development standards and policies shall not require preparation of an additional EIR on the basis of that impact. As such, the project is required to implement all applicable mitigation measures set forth in the 2013 General Plan EIR to avoid, reduce, or offset environmental impacts. Section 6 of this CEQA Analysis identifies the relevant conditions of approval that will be required of the proposed project to demonstrate compliance with mitigation measures set forth in the program level EIR, and policies, programs, and goals of the General Plan.

4.2. Applicability of the Project to CEQA Guidelines Section 15183

Section 15183(d) of the CEQA Guidelines states that streamlining provisions of this section apply to projects that meet the following criteria: (1) the project is consistent with (a) a community plan adopted as part of a general plan, (b) a zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or (c) a general plan of a local agency, and (2) an EIR was certified by the lead agency for the zoning action, the

community plan, or the general plan. The proposed Project is consistent with the General Plan land use designation and zoning for the site, and meets the streamlining provisions under CEQA Guidelines Section 15183(d)(1) as follows:

The Project site is consistent with the General Plan land use designation of General Commercial (GC) and zoning district of Commercial, Gravenstein Corridor (CG) for the site. The GC land use designation is intended to provide for basic business and service needs of the local community, including shopping centers, neighborhood-oriented retail, and highway-oriented commercial uses. Office and multi-family residential land uses which are easily integrated into the adjacent districts are also appropriate. Base densities allow for 15 dwelling units per acre, with 80 percent site coverage. The CG zoning designation implements the GC land use designation of the General Plan. CG is a mixed-use designation that allows for a wide range of retail and service land uses that serve both the local population and regional markets, and for residential uses as part of mixed-use projects. The Project proposes a ground floor commercial space and multifamily residential units consistent with the allowable uses under the General Plan and zoning designations.

The Project proposes development of base units in line with the standard of 15 dwelling units per acre and sets aside 15% of base units for very low-income households, which qualifies the Project for the addition of density bonus units as allowed by right per State law under Government Code Section 65915. The proposed development is consistent with the overall projected development in the City of Cotati General Plan and 2013 General Plan EIR, which assumed build out would result in approximately 1,431 new housing units and 2.39 million square feet of industrial, commercial, public facility, and other non-residential uses within the city limits.

The Project is consistent with General Plan policies, including the following:

- 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.
- Action LU 1c: Prioritize the processing of development applications for infill, underutilized, or vacant parcels designated for urban uses over those projects requiring annexation.
- 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.
- 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 H-2.1: Ensure that adequate land designated for residential and/or mixed-use development is available to accommodate the City's fair share of ABAG's Regional Housing Needs Allocation (RHNA) and monitor on an annual basis to ensure continual compliance with State law.
- Policy H-2.2: Continue to require that residential development in the NU, NM, CG, and DSP zones meet the minimum density requirements identified in the Land Use Code, and report requests for reduced density on an annual basis.
- Policy H-2.7: Require housing developments to provide housing units at a range of affordability levels to assist in meeting the City's housing needs as required by Chapter 17.31 of the Land Use Code.
- Policy H-2.11: Encourage housing development on existing infill sites in order to efficiently utilize existing infrastructure.

- Policy H-3-2: Provide incentives for discretionary affordable housing development that address community priorities, including density bonuses, expedited processing, relaxation in development standards through the use of concessions and incentives, and either reduction, delay, or waiver of fees when financially feasible.
- Policy H-3-3: Continue to provide density bonuses to eligible projects as required by Government Code Section 65915, including projects that meet the minimum amount of total units affordable to extremely low, very low and low income households or provide units restricted to occupancy for senior households.

4.3. CEQA Determination and Summary of Findings

As summarized above and presented herein, the proposed project is eligible for the following CEQA provisions:

Community Plan Exemption. Development of the project site has been planned for and analyzed in the Environmental Impact Reports (EIRs) certified for the City of Cotati General Plan. As such, the analyses in the General Plan program-level EIR are applicable to the project and provide the basis for use of the Community Plan Exemption (California Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183).

The proposed Project will implement applicable mitigation measures identified in the City of Cotati 2013 General Plan EIR (SCH Number 2013082037), as detailed in Section 7 below. With implementation of relevant mitigation measures imposed as conditions of approval, the Project would not result in a substantial increase in the severity or significant impacts that were previously identified in the program level EIR, nor would the project introduce any new significant impacts that were not previously identified. Therefore, there would be no additional environmental impacts beyond those disclosed and analyzed in the 2013 General Plan EIR.

The Cotati Village Community Two Project applicant(s) has reviewed all conditions of approval and as signed below is committed to implementing all conditions of approval as part of the Project. The finding above provides a basis for CEQA compliance. We do hereby certify that the above determination has been made pursuant to State and Local requirements.

The City of Cotati finds that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR (2013 General Plan EIR) pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions to the project or mitigation measures that are imposed upon the proposed project, as environmental conditions of approval, nothing further is required.

_____ _____

Signature: City of Cotati **Date**

_____ _____

Signature: Project Applicant **Date**

5. EVALUATION OF ENVIRONMENTAL EFFECTS

This section examines the Project's potential environmental effects within the parameters outlined in CEQA Guidelines Section 15183(b). The "Prior EIR" (as defined in CEQA Guidelines Section 15183(b)(3), is the City of Cotati 2013 General Plan EIR, inclusive of all impact determinations, significance thresholds and mitigation measures identified therein.

This evaluation builds from the Appendix G Environmental Checklist and has been modified to reflect the parameters outlined in CEQA Guidelines Section 15183(b). The checkboxes in the evaluation below indicate whether the proposed project would result in environmental impacts, as follows:

- **New Significant Impact –** The proposed project would result in a new significant impact that was not previously identified in the General Plan EIR.

- **Substantial Increase in Severity of Previously Identified Significant Impact in General Plan EIR –** The proposed project's specific impact would be substantially greater than the specific impact described in the General Plan EIR.

- **Substantial Change Relative to General Plan EIR –** The proposed Project would involve a substantial change from analysis conducted in the General Plan EIR.

- **Equal or Less Severity of Impact than Previously Identified in General Plan EIR –** The severity of the specific impact of the proposed project would be the same as or less than the severity of the specific impact described in the General Plan EIR.

Where the severity of the impacts of the proposed project would be the same as or less than the severity of the impacts described in the General Plan EIR, the checkbox for "Equal or Less Severity of Impact Previously Identified in GP EIR" is checked. Where the checkbox for "Substantial Increase in Severity of Previously Identified Significant Impact in GP EIR" or "New Significant Impact" is checked, there are significant impacts that are:

- Peculiar to the project or project site (CEQA Guidelines Section 15183(b)(3));

- Not analyzed as significant impacts in the previous EIRs, including off-site and cumulative impacts (CEQA Guidelines Section 15183(b)(2));

- Due to substantial changes in the project (CEQA Guidelines Section 15162(a)(1));

- Due to substantial changes in circumstances under which the project will be undertaken (CEQA Guidelines Section 15162(a)(2)); or

- Due to substantial new information not known at the time the EIRs were certified (CEQA Guidelines Sections 15162(a)(3) and 15183(b)(4)).

Following the Checklist, a summary of the potential environmental impacts relevant to the proposed project that may result from the General Plan, as evaluated in the 2013 General Plan EIR, are described. Next, the potential project-specific environmental effects of the proposed project, including

the project's consistency with the 2013 General Plan EIR, are discussed. Last, applicable General Plan EIR mitigation measures, as well as General Plan Objectives, Policies and Programs, are identified.

As described herein, the proposed project will be required to comply with all applicable mitigation measures and policies identified in the Cotati 2013 General Plan EIR.

This evaluation hereby incorporates by reference the 2013 General Plan EIR discussion and analysis of all environmental topics. The 2013 General Plan EIR significance thresholds have been consolidated and abbreviated in this Checklist; a complete list of the significance thresholds can be found in the 2013 General Plan EIR.

The 2013 General Plan EIR is a program level document that consider the combined effects of implementing several related projects. As such, the analyses presented in the 2013 General Plan EIR represent a cumulative analysis of environmental impacts that may occur from buildout of the General Plan.

5.1. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015. California Scenic Highway Mapping System, Scenic Highway System Lists, 2019; Cotati Village Two Project Plans submitted on February 6, 2024 and May 23, 2024, and City of Cotati Municipal Code.

2013 General Plan EIR Findings

The City of Cotati 2013 General Plan EIR identifies visual and scenic resources throughout the City including scenic highways and corridors, natural scenic resources such as rivers, wildlife area, and prominent visual features in the Cotati Planning Area.

The 2013 General Plan EIR concludes that, with implementation of General Plan policies, impacts to the visual character, visual quality and views to the Sonoma Mountains, and resources along the City's scenic roadways would be significant and unavoidable. The following impacts to aesthetics were considered under the 2013 General Plan EIR:

- Impact 3.1-1: General Plan Implementation could result in Substantial Adverse Effects on Visual Character, including Scenic Vistas or Scenic Resources. General Plan Policies LU 1.4, LU 1.6, LU 1.8, LU 2.1, LU 2.2, LU 3.2, OS 1.1 - OS 1.15, CON 1.15 - CON 1.20 and Actions LU 1c, LU

1d, LU 2b, LU 2c, OS 1a – OS 1g, and CON 1l were identified as mitigating policies. However, despite these measures, implementation of the General Plan would have a significant and unavoidable impact.

- Impact 3.1-2: General Plan Implementation could result in the Creation of New Sources of Nighttime Lighting and Daytime Glare. This impact is considered less than significant. Through the implementation of mitigating General Plan Policy OS 1.13 and Action OS 1f, implementation of the General Plan would have a less than significant impact.

- The City of Cotati adopted the Findings of Fact and Statement of Overriding Considerations on March 24, 2015, including for the significant and unavoidable impacts identified for Aesthetics and Visual Resources (Impact 3.1-1). The City findings determined that despite the significant and unavoidable impact to aesthetic resources, no other project alternative would meet the City's objective to realize the development potential of undeveloped lands for residential, office, and commercial uses necessary for housing opportunity and job growth.

The City of Cotati 2013 General Plan EIR identifies significant visual resources in the Planning Area including views of the Sonoma Mountains, expansive views of agricultural lands, wildlife habitat areas, the Laguna de Santa Rosa, and various creek corridors. These resources can be viewed from public vantage points, including highways, open roads, open space areas, and private residences throughout the Planning Area. The EIR identified Policies LU 1.4, LU 1.6, LU 1.8 which address visual resources associated with the location of new development, preservation of rural areas, and the urban growth boundary. General Plan policies LU 2.1, LU 2.2, and LU 3.2 address site design, OS 1.1 -OS 1.20 address preservation of open space, scenic views, and rural lands and CON1.15-1.19 address preservation of ridgelines, hillsides, and slopes.

The 2013 General Plan EIR determined that buildout of the General Plan would result in significant and unavoidable impacts on scenic vistas or scenic resources and a statement of overriding consideration was adopted with the 2013 General Plan FEIR. The FEIR determined that while the city does not have officially designated scenic vista points, the city contains numerous areas and viewsheds with relatively high scenic value. Identified significant visual resources, including views of the Sonoma Mountains, Laguna de Santa Rosa, agricultural lands, wildlife habitat areas, and creek corridors, could be viewed from public vantage points throughout the city.

While the General Plan establishes policies and actions that are designed to reduce the impact on scenic quality and visual character, the Statement of Overriding Consideration acknowledged that the only method to completely avoid impacts on a citywide basis would be to severely limit the development potential of undeveloped lands that could support job growth and provision of housing options. This was determined not to be consistent with the objectives of the 2013 General Plan to support a range of high-quality housing options and expand economic development and jobs-generating uses in the city. Therefore, the visual impact was determined to be a significant and unavoidable impact.

The 2013 General Plan Final EIR (FEIR) determined that the implementation of the General Plan could result in substantial adverse effects on visual character, including impacts to scenic vistas or scenic resources and no feasible mitigation measures were available. The findings of the FEIR determined that there were mitigating policies included in the 2013 General Plan that would lessen the impacts,

but that they would not reduce the impacts to less than significant. The City adopted a Statement of Overriding Considerations Finding that the benefits of the General Plan outweigh the significant and unavoidable impacts to aesthetic resources.

Project Consistency with the 2013 General Plan EIR

5.1(a)(c) (Scenic Vistas and Visual Character) – No Change Relative to the General Plan EIR

The Project proposes development consistent with the General Plan land use designation, General Plan policies and actions, and development standards applicable to the site. The Project proposes the development of three new buildings consisting of two four-story residential buildings and one commercial café building on a site designated to accommodate such uses, as planned for through buildout of the General Plan. The Project is consistent with applicable policies of the General Plan, as well as development standards such as height limits, setbacks/build-to lines, and site coverage through the provisions of State Density Bonus Law. Building and infrastructure improvements proposed by the Project are similar to existing and approved development in the site vicinity and would not substantially alter the visual character relative to what has been planned for by the General Plan and evaluated in the General Plan EIR.

An assessment of views was provided through a viewshed analysis (Project Plans Sheet A3.3) consisting of project specific photo simulations viewed from SR-116 and Alder Avenue. The Project introduces new buildings but would not obscure public views.

There are 41 trees on the project site that include Valley and Black Oak trees, Cottonwood, Monterey Pine and Coast Redwood, Mexican Fan Palm, and Silver Maple. An Arborist Report prepared by Horticultural Associates on April 30, 2024 states that 36 trees can be preserved and five protected trees will be removed to accommodate the proposed construction. **Environmental Condition of Approval** (**COA) BIO-6** requires that trees removed to accommodate development are replaced in accordance with City of Cotati Municipal Code Chapter 17.54. Further, the landscaping plans for the project include the placement of trees along Alder Avenue and in between the existing development on Parcel 144-040-021 and the proposed development on Parcel 144-040-011. As the Project will preserve a majority of the mature trees onsite; will replace the 5 protected trees proposed for removal, including in-kind replacement of the 3 Valley Oaks; and will pay an in-lieu mitigation fee for an additional 31 Valley Oak mitigation trees that cannot be accommodated on the site, changes to the visual character are consistent with what has been planned for by the General Plan and evaluated in the General Plan EIR.

The Project would introduce new development on an underdeveloped site that would be visible but would not obstruct views of surrounding hillsides from public vantage points. Although the Project will introduce 4-story buildings, which exceeds the City's height limit, this increase in height above the City's standard is provided for through the State Density Bonus provisions and would not interfere with a scenic vista. Furthermore, impacts to the visual character of the City including undeveloped and underdeveloped sites, have been considered in the 2013 General Plan FEIR and acknowledged in the Statement of Overriding considerations. This includes recognizing that development may change the skyline and alter the visual character as vacant, underutilized, and undeveloped site build out as planned for by the General Plan. Furthermore, the Project is subject to the City's Design Review process, which ensures that building design, architecture and materials are of the highest quality and compatibility with the surrounding context. Therefore, the Project would not substantially alter the

visual character or visual quality of the site and will not result in a substantial new or more severe impact to aesthetic resources relative to what was identified in the 2013 General Plan EIR.

5.2(b) (Scenic Resources within a Scenic Highway) – No Change Relative to the General Plan EIR

The 2013 General Plan EIR, as shown on 2013 General Plan EIR Figure 3.1-1, determined there are no officially designated state scenic highways or highways eligible for a designation by the California Department of Transportation Scenic Highways Program within the City. The most recent CalTrans California State Scenic Highway Map designates SR-116 from Sebastopol to Jenner as an officially designated scenic highway and the section between Sebastopol and Highway 101 as eligible for designation as a scenic highway. The Project is located along a section of SR-116 that is designated eligible; however, this section is within the urban growth boundary of the City of Cotati and there is existing commercial development between SR-116 and the project site. Additionally, the Project site is surrounded by urban uses including established commercial and residential development and it is adjacent to a site recently approved to accommodate mixed-use development along the frontage to SR-116 and east of Alder Avenue. The Project will comply with required setbacks, as provided through the State Density Bonus law, and replace trees removed in compliance with City of Cotati Municipal Code Chapter 17.54. As such, the project will not damage scenic resources within a designated state scenic highway. Accordingly, the Project will not result in a substantial new or more severe impact relative to what was identified in the 2013 General Plan EIR.

5.4(d) (Lighting and Glare) – No Change Relative to the General Plan EIR

The Project is located on an underutilized site which is surrounded by existing commercial development and residential uses, vacant parcels planned and approved for future development, roadways, and various sources of existing lighting including streetlights, buildings, and headlights from vehicles. The Project proposes outdoor lighting, consisting of new 11-foot-tall LED street lighting along Alder Avenue, 14-foot-tall LED street lighting along the woonerf, driveway and parking areas, as well as three-and-a-half-foot-tall bollard lighting along pedestrian areas, and wall mounted wedge lighting at building entries. The City's uniformly applied development standards require lighting to have a shielded downward light source no taller than fourteen feet in height. A preliminary lighting plan that complies with Cotati Municipal Code Chapter 17.30.060 was submitted as part of the application packet. As proposed lighting would not exceed 14 feet in height and the brightness would not exceed one candle foot on any adjacent parcel. A final lighting plan will be reviewed prior to issuance of the building permit. Additionally, as documented in the Public Works/Engineering Project Conditions Approval prepared in February 29, 2024, the project is required to comply with City Standard Decorative type lighting and lighting plans shall be reviewed and approved by the City Engineer and the Police Chief.

Lighting associated with new development was anticipated by the 2013 General Plan EIR and the Project site is located in an area designated to accommodate commercial and residential development with existing adjacent sources of lighting. As such, the Project will not result in a substantial new or more severe impact relative to what was identified in the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Action LU 1c: Prioritize the processing of development applications for infill, underutilized, or vacant parcels designated for urban uses over those projects requiring annexation.

Status: The project site is currently underutilized with a land use designation providing for commercial and residential uses in an area containing other existing and planned commercial and residential development. The project site is located within the city limits and annexation is not required. As such, the project complies with this policy.

Action CON 1l: 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.

Status: Assessment of views was provided through a viewshed analysis consisting of project specific photo simulations viewed from the SR-116 and Alder Avenue. The Project introduces new 4-story buildings but would not obscure public views of ridgelines. Further, the Project site has been evaluated for natural resources and the building has been designed to meet applicable development standards within the municipal code including the provision for landscaping. As proposed, the Project complies with this policy.

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.

Status:

The Project design includes a central green located perpendicular to Alder Avenue and adjacent to Building B. Additionally, a multi-use path will be constructed along SR-116 and will connect with a pedestrian path that will run along the western property boundary. Furthermore, in addition to the 36 trees that will be preserved, the landscaping plan includes the planting of 138 trees including 24 Valley Oaks and 18 Coast Live Oaks. The Project will also pay an in-lieu mitigation fee for an additional 31 Valley Oak mitigation trees that cannot be accommodated on the site,

A preliminary lighting plan with code compliant lighting and less than one candlefoot at adjacent parcels was provided and a final lighting plan will be submitted prior to issuance of a building permit. As such, the Project is consistent with this policy.

Conclusion

As discussed below, the project is subject to **COA BIO-6** to implement requirements of the 2013 General Plan EIR mitigating policies and actions associated with tree protection, removal, and replacement.

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to aesthetics relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR.

5.2. AGRICULTURAL AND FORESTRY RESOURCES

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; California Department of Conservation Farmland Mapping and Monitoring Program, 2021; Sonoma County Permit Sonoma GIS, Williamson Act Contracts, 2019; and USGS Land Cover Classification System.

2013 General Plan EIR Findings

The City of Cotati 2013 General Plan EIR determined that approximately 36.42 acres of Farmland of Local Importance within the City limits may be converted to urbanized land uses upon full

buildout of the General Plan. The 36.42 acres of Farmland of Local Importance are not under Williamson Act Contract and represent less than nine percent of the total acreage of Important Farmlands within the Cotati Planning Area. Approximately 63.46 acres of land cover within the City of Cotati are used for agricultural purposes. The 2013 General Plan EIR concluded that with implementation of the policies and action items in the General Plan, impacts to agricultural and forestry resources would be less than significant. The following impacts to agriculture and forestry resources were considered under the 2013 General Plan EIR:

- Impact 3.9-3: Implementation of the General Plan would not result in the conversion of farmland, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. While implementation of the 2013 General Plan would result in the future urbanization of a small amount of Farmland of Local Importance, over 90 percent of the Important Farmlands within the Planning Area would be preserved and protected for ongoing viable agricultural use upon buildout of the General Plan. As such, this impact is considered less than significant.

- Impact 3.8-4: Implementation of the General Plan would not conflict with existing farmlands, agricultural zoning, or Williamson Act Contracts and would have a less than significant impact.

- The City of Cotati 2013 General Plan EIR determined that there are no lands within or adjacent to the city that are currently zoned as forest land, timber, or timber production. Therefore, implementation of the General Plan would have no impact on forest land, timber, or timber production.

- There is no agriculturally zoned land within City limits, and the 36.42 acres of Farmland of Local Importance may be converted to urbanized land uses, which are not under any Williamson Act Contract and represent less than nine percent of the total acreage of Important Farmlands evaluated within the Planning Area.

Project Consistency with the 2013 General Plan EIR

5.2 (a-e) (Farmland, Agricultural Land, Forest Land) – No Change Relative to the General Plan EIR

There are no forestlands, important farmlands, agricultural resources or agricultural preserves located within the project site and surrounding properties. The project site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The 2014 Sonoma County Important Farmland map shows the project site as “Urban and Built-up Land.” Lands adjacent to the project site are designated as “Urban and Built-Up Land” and “Other Land.” The project site is not under a Williamson Act contract. There are no forestlands, timberlands or such zoning on the subject site or vicinity. The proposed project would have no impacts to agricultural resources or forest uses and would not result in the conversion of such lands since none exist on-site or in the immediate project vicinity. Therefore, impacts of the Project to agricultural resources will be equal or less severe than impacts identified in the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

There are no 2013 General Plan EIR mitigation measures nor mitigating policies and actions which are applicable to the Project.

Conclusion

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to agricultural and forestry resources relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. No Conditions of Approval are required beyond compliance with uniformly applied development standards and applicable local and state regulations.

5.3. AIR QUALITY

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; BAAQMD 2017 Bay Area Clean Air Plan; and BAAQMD CEQA Guidelines, April 2022; Cotati Village Two Project Plans submitted on February 6, 2024; Air Quality and Greenhouse Gas Assessment by Illingworth and Rodkin on June 5, 2024; and Air Quality and Greenhouse Gas Assessment by Illingworth and Rodkin on November 17, 2022.

2013 General Plan EIR Findings

The 2013 General Plan EIR evaluated potential impacts to air quality and determined that with implementation of General Plan Policies and Actions that mitigate potential impacts, impacts to air quality would be less than significant. The following impacts to air quality were considered under the 2013 General Plan EIR:

- Impact 3.2-1: The General Plan would not conflict with or obstruct implementation of the applicable air quality plan. Through the implementation of mitigating General Plan Policies CON 2.1 - CON 2.12, CON 3.1- CON 3.20, LU 1.4, LU 1.5, LU 2.3, LU 2.5, LU 2.9, LU 2.10, LU 3.2, LU 3.8, CI 1.2, CI 1.6, CI 1.9, CI 1.17 - CI 1.21, CI 2.17 – CI 2.19 and mitigating Actions CON 2a – CON 2g, CON 3a – CON 3r, implementation of the General Plan would have a less than significant impact.

- Impact 3.2-2: The General Plan would not cause health risks associated with toxic air contaminants. Through the implementation of mitigating General Plan Policies CON 2.1- CON 2.3, CON 2.5 and mitigating Actions CON 2a – CON 2d, implementation of the General Plan would have a less than significant impact.

- Impact 3.2-3: Implementation of the General Plan would not create objectionable odors and would have a less than significant.

- Impact 3.2-4: Implementation of the General Plan would not conflict with Regional Plans and would have a less than significant.

National and State Regulations

The United States Environmental Protection Agency (EPA) sets nationwide emission standards for mobile sources that include on-road motor vehicles and non-road vehicles and equipment, which captures trucks and equipment used in construction. The EPA has established nationwide fuel standards, however the State may set motor vehicle emission standards and standards for fuel that are at least as stringent as national standards. In the past decade, the EPA has established numerous standards for heavy-diesel engines, which are a significant source of NO_X and particulate matter (PM_{10} and $PM_{2.5}$). Diesel particulate matter (DPM) has been identified by the EPA as a probable carcinogen. Implementation of the standards are estimated to reduce particulate matter and NO_X emissions from diesel engines up to 95 percent in 2030, when the heavy-duty fleet is completely replaced by newer emission compliant vehicles. The EPA has also substantially reduced the amount of sulfur, a significant contributor to formation of particulate matter in diesel engine exhaust, allowed in diesel fuels. The federal diesel engine and diesel fuel requirements have been adopted by California, with modifications in some cases containing more stringent requirements or sooner implementation dates.

The California Air Resources Board (CARB) establishes statewide standards for emissions reductions. CARB has developed a plan to reduce diesel emission, the Risk Reduction Plan to Reduce Particulate Matter Emission from Diesel-Fueled Engines and Vehicles. In addition to requiring more stringent emission standards to aim for a reduction of particulate matter emission by 90 percent in new mobile sources and stationary diesel engines, the plan includes emission control strategies for existing diesel vehicles and engines. CARB has also adopted regulations to reduce DPM and NO_X emission from existing and new off-road heavy-duty diesel vehicles, which include certain construction equipment. Regulations intended to reduce particulate matter and NO_X exhaust equipment include replacing older equipment with newer equipment or conducting retrofits.

Bay Area Air Quality Management District

The City of Cotati is located within the San Francisco Bay Area air basin and regulated by the Bay Area Air Quality Management District (BAAQMD). The Bay Area Air Basin is designated as non-attainment for both the one-hour and eight-hour state ozone (O_3) standards, 0.09 parts per million (ppm) and 0.07 ppm, respectively. The Bay Area Air Basin is also in non-attainment for PM_{10} and $PM_{2.5}$ state standards, which require an annual arithmetic mean (AAM) of less than 20 $\mu g/m^3$ for PM_{10} and less than 12 $\mu g/m^3$ for $PM_{2.5}$. In addition, the Basin is designated as non-attainment for the national 24-hour fine particulate matter ($PM_{2.5}$). All other national ambient air quality standards within the Bay Area Air Basin are in attainment.

The air quality analyses in the 2013 General Plan EIR relied on prior BAAQMD screening criteria and clean air plans. Since preparation of the 2013 General Plan EIR, the BAAQMD has adopted the 2017

Bay Area Clean Air Plan (CAP). On April 20, 2022, BAAQMD adopted new CEQA thresholds for determining the level of significance for a development project along with new screening criteria.

Local Regulation

The 2013 General Plan EIR determined that implementation of the General Plan would result in less than significant impacts with the following mitigating policies: Policies CON 2.1- CON 2.12, CON 3.1-CON 3.20, LU 1.4, LU 1.5, LU 2.3, LU 2.5, LU 2.9, LU 2.10, LU 3.2, LU 3.8, CI1.2, CI 1.6, CI 1.9, CI 1.17-1.20, CI 1.21, and CI 2.17- 2.19 and Actions CON 2a-2d and 3a-3r.

The 2013 General Plan EIR determined that the implementation of the General Plan would be consistent with the Regional Transportation Plan and would not impede efforts to reduce air quality emissions at the regional level.

The Project site is located in San Francisco Bay Area Air Basin (SF Air Basin) within the Cotati Valley Region. Wind patterns in the Cotati Valley are strongly influenced by the Petaluma Gap, with winds flowing predominantly from the west (BAAQMD 2017a). Cotati Valley has a potential for reduced air quality due to a larger population, industrial facilities in and around Santa Rosa, and increased motor vehicle traffic and the associated air contaminants.

The Air Basin meets all ambient air quality standards with the exception of ground-level ozone, respirable particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$). In Sonoma County, measured levels of air pollutants are below air quality standards, including ozone, PM_{10} and $PM_{2.5}$. High ozone levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NOx). These precursor pollutants react under certain meteorological conditions to form high ozone levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ozone levels. High ozone levels aggravate respiratory and cardiovascular diseases, reduced lung function, and increase coughing and chest discomfort.

Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM10) and fine particulate matter where particles have a diameter of 2.5 micrometers or less (PM2.5). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide (or cumulative) emissions and localized emissions. High particulate matter levels aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children.

Toxic air contaminants (TAC) are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer) and include, but are not limited to, the criteria air pollutants listed above. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, State, and Federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three quarters of the cancer risk from TACs (based on the Bay Area average). According to the California Air Resources Board (CARB), diesel exhaust is a complex mixture of gases, vapors and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as

TACs by the CARB, and are listed as carcinogens either under the state's Proposition 65 or under the Federal Hazardous Air Pollutants programs.

Project Consistency with the 2013 General Plan EIR

5.3(a,b) (Conflict with Plan, Increase Criteria Pollutants) – No Substantial Change Relative to the General Plan EIR

The most recent and comprehensive air quality plan is the Bay Area 2017 Clean Air Plan. The primary goals of the Clean Air Plan are to attain air quality standards, reduce population exposure and protect public health, and reduce GHG emissions and protect the climate. The BAAQMD has also developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality and GHG impacts. In formulating compliance strategies, BAAQMD relies on the planned land uses identified in local general plans.

The 2017 Clean Air Plan, adopted by BAAQMD in April 2017, includes control measures that are intended to reduce air pollutant emissions in the Bay Area either directly or indirectly. Plans must show consistency with the control measures listed within the Clean Air Plan. At the project-level, there are no consistency measures or thresholds. The proposed project would not conflict with the latest Clean Air planning efforts since 1) project would have construction and operational emissions below the BAAQMD thresholds and 2) the project would be considered urban infill, and 3) the project would be located near employment centers.

The 2017 Clean Air Plan includes CEQA Thresholds which are seen below in **Table 5.3.1**. These thresholds were updated on April 20, 2022, and determine whether the project would have construction and operational emissions below the BAAQMD thresholds.

Table 5.1: Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
ROG	54	54	10
NOx	54	54	10
PM_{10}	82 (Exhaust)	82	15
$PM_{2.5}$	54 (Exhaust)	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other BMP	Not Applicable	
Health Risks and Hazards	**Single Sources Within 1,000-foot Zone of Influence**	**Combined Sources (Cumulative from all sources within 1,000-foot zone of influence)**	
Excess Cancer Risk	>10 per one million	>100 per one million	
Hazard Index	>1.0	>10.0	
Incremental annual $PM_{2.5}$	>0.3 µg/m^3	>0.8 µg/m^3	

Source: BAAQMD's April 2022 CEQA Air Quality Guidelines

Note: BMP = Best Management Practices, ROG = reactive organic gases, NOx = nitrogen oxides, PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less;

Construction Emissions

An Air Quality and Greenhouse Gas Assessment was prepared by Illingworth and Rodkin, Inc. on June 5, 2024 (**Appendix A**). To estimate the emissions from construction of the Project and long-term operations, the California Emissions Estimator Model (CalEEMod) was used. CalEEMod is a statewide model designed to provide a uniform platform to quantify air quality emissions from land use projects, which allows for projection of emissions from on-site construction activity, construction vehicle trips, and evaporative emissions. Calculations of the Project's emissions were performed as part of the Air Quality and Greenhouse Gas Assessment.

The construction build-out scenario including equipment list and schedule, were based on project-specific information provided by the project applicant. The Assessment captures all construction activities including onsite and offsite. On-site activities are primarily made up of construction equipment emissions, while offsite activities include worker, hauling, and vendor traffic. The construction schedule assumed that the earliest possible start date would be January 2025 and the project would be built out over a period of approximately 10 months, or 216 construction workdays. The earliest year of operation was assumed to be 2026. Average daily emissions were computed by dividing the total construction emissions by the number of active workdays. **Table 5.3.2** shows the average daily construction emissions of ROG, NOX, PM_{10} exhaust, and $PM_{2.5}$ exhaust during construction of the project. As indicated in Table 5.3.2, predicted annualized project construction emissions would not exceed the BAAQMD significance thresholds during any year of construction.

Table 5.2 Construction Period Emissions

Year	**ROG**	**NOx**	**PM_{10}**	**$PM_{2.5}$**
Construction Emissions Per Year (Tons)				
2025	1.13	0.93	0.04	0.03
Average Daily Construction Emissions Per Year (pounds/day)				
2025 (216 construction work days)	10.43	8.57	0.34	0.31
BAAQMD Threshold (lbs/day)	54	54	82	54
Exceed Threshold?	**No**	**No**	**No**	**No**

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less-than-significant if best management practices are implemented. The Project is subject to a Construction Emissions Minimization Plan that includes measures consistent with the BAAQMD-recommended basic control measures for reducing fugitive dust. General Plan Policy CON 2.5 requires projects to implement BAAQMD dust control measures. To ensure these measures are followed, **COA AQ-1** is

imposed on the project and requires the implementation of BAAQMD Best Management Practices to reduce fugitive dust emissions.

Operational Emissions

Operational air emissions from the project would be generated primarily from autos driven by future residents and employees. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are typical emissions generated during operation from these types of uses.

The daily trip generation was calculated using ITE trip generation rates, the size of the project land uses, and the adjusted total automobile trips after reductions. The Saturday and Sunday trip rates were derived by multiplying the ratio of the CalEEMod default rates for Saturday and Sunday trips to the default weekday rate with the project-specific daily weekday trip rate. The default trip lengths and trip types specified by CalEEMod were used. The Air Quality Assessment analyzed emissions from approximately 1,773 daily trips based on the Traffic Impact Analysis. When accounting for trip reduction adjustments that include internal capture, the project would produce 1,180 new trips. The operational emissions shown in **Table 5.3.3** are those anticipated by the Project.

CalEEMod defaults for energy use were used, which include the 2019 Title 24 Building Standards. GHG emissions modeling includes those indirect emissions from electricity consumption. The CalEEMod default emission factor of 39.46 pounds of CO2 per megawatt of electricity produced by Sonoma Clean Power was used. The project will be all electric according to the project applicant. Therefore, natural gas for the residential and cafe land use was set to zero and the energy use associated with natural gas reassigned to electricity use in CalEEMod. Additionally, the number of woodstoves and woodburning fireplaces in CalEEMod were set to zero.

Default model assumptions for emissions associated with solid waste generation use were used. Wastewater treatment was changed to 100 percent aerobic conditions to represent the use of city sewer services (i.e., project would not send wastewater to septic tanks or facultative lagoons).

Table 5.3 Operational Emissions

Scenario	**ROG**	**NOx**	**PM10**	**PM2.5**
2026 Annual Project Operations Emissions (Tons/year)	1.68	0.96	1.38	0.36
BAAQMD Thresholds (tons/year)	*10*	*10*	*15*	*10*
2026 Daily Project Operational Emissions (lbs/day)[1]	9.20	5.27	7.55	1.98
BAAQMD Thresholds (lbs/day)	*54*	*54*	*82*	*54*
Exceed Thresholds?	**No**	**No**	**No**	**No**

The Project would not result in a significant increase in criteria air pollutants or conflict with a Clean Air Plan because, as conditioned, the Project would implement Best Management Practices and have construction and operational emissions below the BAAQMD thresholds, would be on an urban site planned for urban development, and would be located near employment centers, goods and services. Therefore, as conditioned, the Project will not result in a substantial new or more severe impact relative to what was identified in the 2013 General Plan EIR.

5.3(c) (Sensitive Receptors) – No Substantial Change Relative to the General Plan EIR

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known toxic air contaminant (TAC). Although exhaust would not be considered to contribute substantially to air quality violations, construction exhaust emissions may still pose health risks for sensitive receptors (e.g., nearby residents). The primary community risk impacts associated with construction emissions are cancer risk and $PM_{2.5}$ exposure. The health risk assessment for the Project's construction activities was conducted to evaluate potential health effects to nearby sensitive receptors from construction emissions of Diesel Particulate Matter (DPM) and $PM_{2.5}$ which included dispersion modeling to predict the offsite and onsite concentrations.

CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and parks. For cancer risk assessments, children are the most sensitive receptors, since they are more susceptible to cancer causing TACs. Residential locations are assumed to include infants and small children. The maximally exposed individual (MEI) is identified as the sensitive receptor that is most impacted by the project's construction and operation and other nearby and proximate sensitive receptors within 1,000 feet of the site. This includes the nearby existing residences surrounding the project site and the recently approved PA#21-29 Cotati Village #1 residences, as shown in Figure 5.1. Residential receptors include all receptor groups (e.g., third trimester, infants, children, and adults) with almost continuous exposure to project emissions.

Project construction activities would generate dust and equipment exhaust that could affect nearby sensitive receptors. Operation of the project would increase traffic consisting of mostly light-duty gasoline-powered vehicles, which would produce TAC and air pollutant emissions. Project impacts to existing sensitive receptors were assessed for temporary construction activities and long-term operational conditions. There are also several sources of existing TACs and localized air pollutants in the vicinity of the project (e.g. project area roadways and stationary source emitters). The impact of the existing sources of TAC was also assessed in terms of the cumulative risk which includes the proposed project's contribution.

Impacts to existing residents adjacent to the Project site could occur during construction activities. In compliance with the BAAQMD recommendations, a community risk assessment was conducted, as part of the Air Quality and Greenhouse Gas Assessment (**Appendix A**) to evaluate health risks from construction and operation, including predicting increased cancer risk, estimating increase in annual $PM_{2.5}$ concentrations, and computing the Hazard Index (HI) for non-cancer health risks. The following BAAQMD thresholds of significance were used to determine whether the Project would create a significant adverse impact related to health risks and hazards as follows:

Project Level Thresholds of Significance

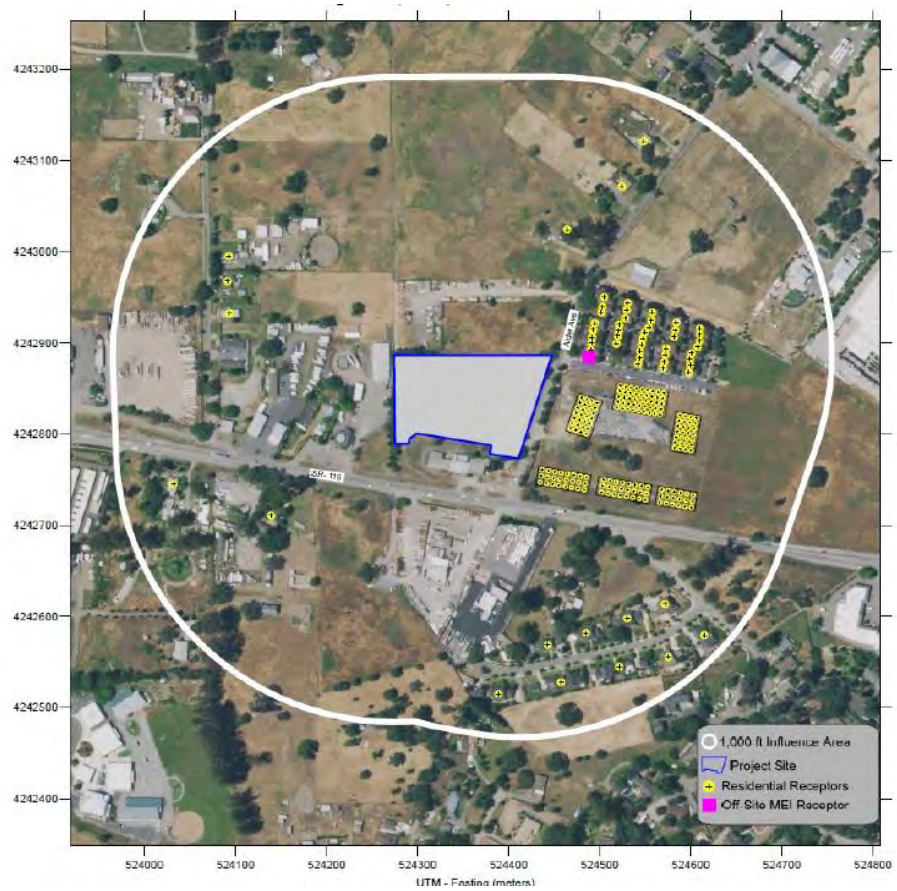
- Increase cancer risk greater than 10 in a million
- Increased hazard greater than 1 (chronic or acute)
- Increase $PM_{2.5}$ greater than 0.3 $\mu g/m^3$ annual average

Cumulative Thresholds of Significance

- Cancer risk greater than 100 in a million (from all local sources)
- Hazard greater than 10 (chronic from all local sources)
- $PM_{2.5}$ greater than 0.8 µg/m^3 annual average

Potential impacts were evaluated for construction and operation of the Project. Nearby sensitive receptors and the maximum exposed individual receptor (MEI) are shown in **Figure 5.3.1.**

Figure 6: Location of Project Construction site, off-Site Sensitive Receptors, and Maximum TAC Impacts (MEI)



Source: Air Quality & Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, June 5, 2024.

Project Construction

Using U.S. EPA ISCST3 dispersion model, the Air Quality and Greenhouse Gas Assessment modeled annual DPM and $PM_{2.5}$ concentrations at nearby sensitive receptors to find the Maximum Exposed Individual (MEI), which represents the most sensitive receptor receiving the great impact from the Project. Emission sources for the construction site were grouped into two categories: exhaust emissions of DPM and fugitive $PM_{2.5}$ dust emissions.

The MEI most affected by construction was located on the second floor (15 feet) of a residence in the southwest corner of the existing townhomes along Alder Avenue. The annual PM2.5 concentration

MEI was located at the same location on the first floor (5 feet). Project risk impacts are shown in **Table 5.3.4**.

Table 5.4: Construction Risk Impacts at the Off-Site Project MEI

Source		Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Impacts				
Project Construction (Years 0 - 2)	Unmitigated	16.46 (Infant)	0.45	0.02
	Mitigated	4.41 (infant)	0.16	0.01
BAAQMD Single-Source Threshold		10	0.3	1.0
Exceed Threshold?	Unmitigated	Yes	Yes	No
	Controlled	No	No	No

Source: Air Quality & Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, June 5, 2024.

The predicted HI values from project construction activities at the MEI location would not exceed the threshold. The uncontrolled maximum cancer risks and annual $PM_{2.5}$ concentration would exceed their respective single-source significance thresholds. This would be a significant impact in terms of increased cancer risk and PM2.5 concentrations. However, in accordance with General Plan Policy CON 2.2, **COA AQ-2** has been imposed and requires that the Project implement a Construction Emissions Minimization plan. With the implementation of **COA AQ-2**, the project will not exceed health risk thresholds during construction activities.

Project Operation

The operation of the Project would not include stationary sources (e.g., emergency generators) of TACs as it would only include typical activities associated with residential activities. Diesel powered vehicles are the primary concern with local traffic-generated TAC impacts. This project would generate 1,773 daily trips or 1,180 net daily trips. The project traffic would be dispersed on the roadway system with a majority of the trips being from light-duty vehicles (e.g., passenger automobiles). The typical operations of the Project as a residential development are expected to generate long-term emissions from mobile sources emissions, however, typical residential activities and the low trip quantity and type of trips generated would be negligible to health risk impact.

Cumulative Health Risks of all TAC Sources at the Off-Site Project MEI

Cumulative health risk assessments typically look at all substantial sources of TACs that can affect sensitive receptors located within 1,000 feet of a project site (i.e., influence area). These sources include rail lines, freeways or highways, busy surface streets, and stationary sources identified by BAAQMD. There were two substantial sources of TACs identified in the analysis of the project: Highway 116 (SR-116) and construction impacts from nearby developments.

Cancer risk, PM2.5 concentrations, and HI associated with traffic on SR-116 were estimated using BAAQMD screening values provided via GIS data files (i.e., raster files). BAAQMD raster files provide screening-level cancer risk, PM2.5 concentrations, and HI for roadways within the Bay Area and were produced using AERMOD and 20x20-meter emissions grid. The raster file uses EMFAC2021 data for vehicle emissions and fleet mix for roadways, and includes Appendix E of the Air District's CEQA Air Quality Guidance for risk assessment assumptions.

The mitigated construction risks and hazard values for the nearby development (Cotati Village Community One) were available from its air quality technical report conducted by Illingworth & Rodin, Inc. on November 17, 2022. The Cotati Village Community One is assumed to be occupied prior to construction of the proposed Project. However, to provide a conservative analysis, the cumulative analysis assumed the entire construction period from the proposed project would overlap with the nearby development's construction schedule. This approach provides an overestimate of the health risk and hazard levels because it assumes that maximum impacts from the nearby development occurs concurrently with the proposed project at the proposed project's MEIs. Additionally, the West Cotati Avenue/SR-116 realignment project may overlap with the construction of the Project. However, **COA MF-1** requires the Applicant coordinate the project's construction activities and construction schedule with the City to coordinate any concurrent construction of projects within 1,000 feet of the project site.

Health risk impacts from these sources upon the MEIs are reported in **Table 5.3.5**. As shown in the table, unmitigated, the combined sources would exceed the BAAQMD Cumulative Source Threshold. However, through the implementation of **COA AQ-1** and **COA AQ-2**, the project will not exceed the Cumulative Source Threshold.

Table 5.5 Cumulative Health Risk Impact at the Project MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Impacts			
Project Construction Unmitigated Mitigated	16.46 (infant) 4.41 (infant	0.45 0.16	0.02 0.01
BAAQMD Single-Source Threshold	**10**	**0.3**	**1.0**
Exceed Threshold? Unmitigated Mitigated	Yes No	Yes No	 No
Cumulative Sources			
SR-116, BAAQMD Raster Screening Tool	14.17	0.25	0.04
Cotati Village #1 Mitigated Construction Impacts	4.50	0.11	<0.01
Combined Sources Unmitigated Mitigated	35.13 23.08	0.81 0.52	<0.07 <0.06
BAAQMD Cumulative Source Threshold	**100**	**0.8**	**10.0**
Exceed Threshold? Unmitigated Mitigated	No No	Yes No	No No

Source: Air Quality & Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, June 5, 2024

Summary of Health Risks at the Project MEI

The project would exceed the health risk caused by project construction activities, since the maximum unmitigated cancer risk and annual $PM_{2.5}$ concentration exceed the BAAQMD single-source thresholds and the annual $PM_{2.5}$ concentration exceeds the cumulative-source thresholds. With the implementation of COA AQ-1, the project's cancer risk and PM2.5 concentration would be lowered to levels below the significance thresholds. The HI risk value does not exceed the single- or cumulative-source threshold. Project impacts would be reduced to below health risk thresholds with the implementation of BAAQMD's BMPs and Construction Emissions Management Plan required by **COA AQ-1** and **AQ-2** in accordance with Policy Con 2.2 and Policy Con 2.5.

As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.3(d) (Odors) – No Substantial Change Relative to the General Plan EIR

The Project would result in generation of emissions during construction and long-term operation that may be a source of odors. Development of the Project site is consistent with the land use designation applicable to the site and would not feature uses with typical odor-generating operations (e.g., wastewater treatment plants, landfills, and composting facilities). During operations, the most significant source of emissions would be from the routine operation of vehicles traveling through streets in and around the site. The majority of vehicular travel associated with the uses of the Project is expected to be from light-duty vehicles, and odors from vehicle emissions would not be substantially different from the existing environment that includes existing residential uses to the north and SR-116 roadway to the south.

During construction, diesel fume emissions from operation of diesel-fueled equipment and heavy-duty trucks would create odors that may be considered objectionable. However, construction activities will be temporary and limited to construction hours as provided under Cotati Municipal Code Chapter 17.30 and as provided in conditions of approval. Standard hours of construction are Monday-Friday 7:00 a.m. to 7:00 p.m.; Saturday, Sundays, and Holidays are only allowed by the review authority through conditions of approval between 9:00 a.m. and 5:00 p.m. Additionally, **COA AQ-1** and **COA AQ-2** will minimize emissions and associated odors. Accordingly, the Project would not be expected to result in substantial objectionable odors.

As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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.

Status: The Project is located on a vacant site planned for high density multifamily residential units and commercial space for a mixed-use and compact development plan. The Project encourages alternative transportation options by including construction of a Class I multi-use path along the SR-116 frontage, incorporating bicycle parking onsite as conditioned, and introducing higher density residential uses in proximity to an existing bus stop located next to the site. The Project would be

subject to **COA AQ-1** and **AQ-2** to minimize air quality impacts. As such, the project is consistent with this policy.

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

Status: Recommendations to minimize impacts to less than significant levels are provided in the Air Quality Assessment and have been imposed as **COA AQ-1** and **COA AQ-2**. Therefore, the project is consistent with this policy.

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

Status: The Project is required to comply with all building code standards and latest BAAQMD standards for fireplaces, stoves, and heaters in place at the time of Building Permit submittal. Through the application of uniformly applied development standards, the project is consistent with this policy.

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

Status: Recommendations to minimize construction emissions pursuant to BAAQMD's dust control and abatement measures have been imposed as **COA AQ-1** and **COA AQ-2**. As such, the project is consistent with this policy.

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.

Status: The Project includes the development of a Class I multi-use path at the SR-116 frontage, which extends the pedestrian and bicycle circulation facilities available around the site. The Project also incorporates an internal network of pedestrian pathways that will connect with the public sidewalks along Alder and SR-116. Further, a 28-foot-wide strip of land along the western boundary will be reserved for a potential future north-south connecting road. A pedestrian pathway will be installed in this section and connected with the pedestrian pathway along SR-116. As such, the project is consistent with this policy.

Action CON 2b: Refer development, infrastructure, and planning projects to the Bay Area Air Quality Management District (BAAQMD) for review. Require project applicants to prepare air quality analyses to address BAAQMD and General Plan requirements, which include analysis and identification of:

- Air pollutant emissions associated with the project during construction, project operation, and cumulative conditions.
- Potential exposure of sensitive receptors to toxic air contaminants.
- Significant air quality impacts associated with the project for construction, project operation, and cumulative conditions.

- Mitigation measures to reduce significant impacts to less than significant or the maximum extent feasible where impacts cannot be mitigated to less than significant.

Status: An Air Quality and Greenhouse Gas Assessment (**Appendix A**) has been prepared in accordance with Action CON 2b. Findings of the analysis have been referenced in the discussions above. Recommendations to minimize air quality emissions are provided in the Assessment and have been imposed on the Project as **COA AQ-1** and **COA AQ-2**. As conditioned, the project is consistent with this policy.

Conclusion and Environmental Conditions of Approval

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to air quality relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental conditions of approval are required to implement the 2013 General Plan EIR mitigating policies and actions:

COA AQ-1: During any construction period ground disturbance, the Project will ensure that the Project contractor(s) implement the following measures to control dust and exhaust that are recommended by BAAQMD and listed below:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per 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 (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Designate a Disturbance Coordinator and post a publicly visible sign with the telephone number of the Disturbance Coordinator to contact regarding dust complaints. The Disturbance Coordinator shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

COA AQ-2: All contractors shall implement a Construction Minimization Plan including all feasible measures to reduce diesel particulate matter emissions as follows:

1. All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for PM

(PM10 and PM2.5), if feasible. If Tier 4 equipment is not available for a particular piece of equipment, then use equipment that meets U.S. EPA emission standards for Tier 2 or engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve a 45 percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination).

2. Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 45 percent or greater. Elements of the plan could include a combination of some of the following measures:
    - Installation of electric power lines during early construction phases to avoid use of diesel portable equipment,
    - Use of electrically-powered equipment,
    - Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,
    - Change in construction build-out plans to lengthen phases, and
    - Implementation of different building techniques that result in less diesel equipment usage. Provide line power to the site during the early phases of construction to minimize the use of diesel-powered stationary equipment.

5.4. BIOLOGICAL RESOURCES

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (Formerly Fish and Game) or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife (formerly Fish and Game) or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other	☐	☐	☒	☐

approved local, regional, or state habitat conservation plan?	

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Final Santa Rosa Plain Conservation Strategy, 2005, USFWS; Recovery Plan for the Santa Rosa Plain, 2016, USFWS; Reinitiation of Formal Consultation on Issuance of Clean Water Act, Section 404 Permits by the U.S. Army Corps of Engineers (Corps) on the Santa Rosa Plain, Sonoma County, California, 2020, USFWS; Biological Resource Analysis prepared my Monk and Associates on October 11, 2022; Biological Resources Memo from Monk and Associates prepared on June 3, 2024; and Tree Inventory Report for 7515 Alder Ave prepared by Horticultural Associates on April 30, 2024.

2013 General Plan EIR Findings

Biological resources are protected by federal and state statute including the Federal Endangered Species Act (FESA), the California Endangered Species Act (CESA), the Clean Water Act (CWA), and the Migratory Bird Treaty Act (MBTA) which affords protection to migratory bird species including birds of prey. These regulations provide legal protection for identified plant and animal species of concern and their habitat.

The 2013 General Plan EIR evaluated potential impacts to biological resources in Chapter 3.3 and determined the following:

- Impact 3.3-1: Implementation of the General Plan Update could result in direct and indirect loss of habitat and individuals of endangered, threatened, rare, proposed, and candidate plant and wildlife species, plant species identified by the California Native Plant Society with a rating of List 1A or 1B (i.e., rare, threatened, or endangered plants) as well as animal and plant species of concern and other non-listed special status species. This would be a less than significant impact with identified policies including Policy CON 1.1, CON 1.2, CON.

- Impact 3.3-2: Implementation of the General Plan Update has the potential to result in significant impacts to sensitive natural communities including riparian habitat, however the implementation of the policies and action measures of the General Plan, as well as adherence to state and federal regulations, would reduce these impacts to less than significant.

- Impact 3.3-3: Implementation of the General Plan Update has the potential to result in significant impacts to protected waters, however the implementation of the policies and action measures of the General Plan, as well as adherence to state and federal regulations, would reduce these impacts to less than significant.

- Impact 3.3-4: Implementation of the General Plan Update could interfere substantially with the movement of native resident or migratory fish or wildlife species. This would be a less than significant impact with incorporation of General Plan policies and actions items.

- Impact 3.3-5: Implementation of the General Plan Update would support the existing Tree Preservation and Protection Ordinance through its policies and will not conflict with the Ordinance or with the policies that the General Plan contains that pertain to protecting biological resources. Implementation of the policies and action measures in the General Plan

would ensure consistency with established ordinances and therefore the Project's impact is less than significant.

- Impact 3.3-6: Implementation of the General Plan Update 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 plans as there are none that have been adopted or are applicable to the General Plan. The General Plan would have a less than significant impact relative to this topic.

The 2013 General Plan EIR concluded that construction and maintenance activities associated with future development projects under the proposed General Plan could result in the direct and indirect loss or indirect disturbance of special-status wildlife or plant species or their habitats as well as wetlands and Waters of the United States that are known to occur, or have potential to occur, in the region.

These impacts are mitigated by General Plan Policies CON 1.1-1.14 which provide a framework for protecting, enhancing, rehabilitating, and avoiding sensitive habitat areas including waterways. These policies include requirements for discretionary projects to develop in an environmentally sustainable manner. Furthermore, actions required by the General Plan that mitigate the impacts include Action CON 1a and 1b which requires all development project proposals to submit a biological resources evaluation which determines whether significant adverse impacts will occur and to include mitigation measures as needed. These are further supported by additional Actions CON 1c and 1d, 1f, and 1g which require project review and mapping of sensitive habitats and conservation.

Furthermore, Policy CON 3.13 requires the City to continue to implement the City's Tree Preservation and Protection Ordinance and consistent with local policies to protect and preserve biological resources.

Santa Rosa Plain Conservation Strategy, Recovery Plan, and Reinitiation Plan

The City of Cotati does not have a habitat conservation plan, but it is located within the boundary of the Santa Rosa Plain (SRP). The SRP is a unique environment that supports a mosaic of vernal pools, seasonal wetland, and grassland habitats, which provide a home to the threatened and endangered species. The Santa Rosa Plain Conservation Strategy (Conservation Strategy) was developed by the US Fish and Wildlife Service in 2005 to create a long-term conservation program sufficient to mitigate potential adverse effects on listed species due to future development on the Santa Rosa Plain. The conservation strategy provides specific actions necessary to mitigate potential adverse effects on listed species due to future development on the Plain.

The Recovery Plan for the Santa Rosa Plain was released by the United States Fish and Wildlife Service (USFWS) in June 2016 and provides a framework for the recovery of listed species. Subsequently, in 2020, the USFWS published the reinitiation of formal consultation on issuance of Section 404 of the Clean Water Act for the Santa Rosa Plain. The reinitiation of the Biological Opinion analyzes the impacts to critical habitat as it relates to development in the Santa Rosa Plain. As noted therein, development in the Santa Rosa Plain would result in the filling of wetlands and removal of upland habitat, resulting in the loss of critical habitat for CTS as well as Burke's Goldfield, Sebastopol Meadowfoam, and Sonoma Sunshine. To address these impacts, the Corps provides several minimization measures and best management practices for each species including updates to

measures identified in the 2005 Conservation Strategy and 2007 Biological Opinion to reflect current knowledge and more effectively minimize adverse impacts of development within the Santa Rosa Plain.

Though not a habitat conservation plan, the Santa Rosa Plain Conservation Strategy Plan, Recovery Plan, and Reinitiation Plan are intended to mitigate potential adverse impacts on listed plant and animal species within the Plan area. The Plans establish a long-term conservation program to mitigate potential adverse impacts associated with development in the Santa Rosa Plain, conserve and contribute to the recovery of the listed species and the conservation of sensitive habitat, protect public and private land use interests, and support issuance of an authorization for incidental take of CTS and that may occur in the course of carrying out a broad range of activities in the Santa Rosa Plain area, including development such as the proposed project.

Existing Site Conditions

A site-specific Biological Resource Analysis was prepared by Monk & Associates on October 11, 2022 (**Appendix B**). Monk & Associates researched the most recent version of the California Department of Fish and Wildlife's (CDFW) Natural Diversity Data Base (CNDDB) for reported occurrences of special-status vegetation communities, plants and animals. Based on the CNDDB record search, Monk & Associates compiled a list of nine (9) special-status plant species and nine (9) special-status wildlife species that are known from the region of the project site. Monk and Associates have a long history working on the Project site. Biological plant surveys were conducted annually between 2015 and 2019. A letter from Monk & Associates prepared on June 3, 2024 (**Appendix B**) documents that protocol level special-status plant surveys were conducted on April 8, 2024, April 30, 2024, and May 14, 2024, and that no special status plants were identified on the Project site and that all other baseline information and survey findings contained in the 2022 BRA remains accurate.

On September 3, 2019, Monk & Associates reviewed the CNDDB for new records of CTS and observed two updated records within 2 miles of the project site. Records where CTS are known to occur or have been previously observed are updated when a new observation is made. The updated record demonstrates that CTS continue to be observed in areas where their presence has previously been documented. More details about the history of CTS on the site are provided below.

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

A ruderal herbaceous community comprises the majority of the project site. Some of these non-native grass dominants found on site include Harding grass (*Phalaris aquatica*), wild oats (*Avena barbata*), soft chess (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), Italian ryegrass (*Festuca perennis*), brome fescue (*Festuca bromoides*), hare barley (*Hordeum murinum ssp. leporinum*), and tall oat grass (*Arrhenatherum elatius*). Common non-native forbs found on t site include bristly ox-tongue (*Helminthotheca echioides*), bindweed (*Convolvulus arvensis*), Italian thistle (*Carduus pycnocephalus ssp. pycnocephalus*), purple salsify (*Tragopogon porrifolius*), Queen Ann's lace (*Daucus carota*), fennel

(*Foeniculum vulgare*), prickly lettuce (*Lactuca serriola*), rough cat's ear (*Hypochaeris radicata*), spring vetch (*Vicia sativa*), wild radish (*Raphanus sativus*), cutleaf geranium (*Geranium dissectum*), mustards (*Brassica nigra, Hirschfelda incana* and *Sisymbrium altissimum*) and clovers (*Trifolium incarnatum, Trifolium subterraneum, Trifolium dubium and Trifolium hirtum*).

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

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

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

An incised drainage ditch, containing mature oak trees is located west of the project site boundary and will not be modified by the proposed project. This feature is man-made, constructed to receive surface water runoff from paved and hardpacked surfaces. There is no contiguous flow pattern connecting this feature to other offsite drainages. The Corps' jurisdictional map identified the incised drainage ditch an as isolated feature. As such, this feature does not meet the criteria to be classified as a stream under Fish and Game Code Section 1602 and there are no other features onsite that meet such a classification.

Project Consistency with the 2013 General Plan EIR

5.4(a-c) (Special-Status Species, Sensitive Natural Communities and Jurisdictional Waters) – No Substantial Change Relative to the General Plan EIR

Certain vegetation communities and plant and animal species are designated as having special-status based on their overall rarity, endangerment, restricted distribution, and/or unique habitat requirements. In general, special-status is a combination of these factors that leads to the designation of a species as sensitive. The FESA outlines the procedures whereby species are listed as endangered

or threatened and establishes a program for the conservation of such species and the habitats in which they occur. The CESA amends the California Fish and Game (Wildlife) Code to protect species deemed locally endangered and essentially expands the number of species protected under the FESA. Below is a description of the sensitive habitats and species that could occur on the project site or in the vicinity:

Special-Status Plant Species

A record search of the CDFW's CNDDB (2022) for special-status plant records occur within three miles of the project site, and the CNPS Inventory (CNPS 2022) for a list of special-status plant species from the same U.S. Geological Survey quadrangle as the project site (Cotati Quadrangle), M&A compiled a list of 12 special status plant species that are known from the region of the project site.

Formal rare plant surveys were conducted on the project site in 2015 by Mr. Roy Buck, Senior Botanist with California Environmental Services, LLC and by Monk & Associates in 2017. Monk & Associates also conducted a mid-summer rare plant survey on July 15, 2016, for late-blooming species and identified no rare plants.

In compliance with CDFW survey guidelines that were released on March 18, 2018, one additional year of surveys was conducted on the project site in 2019 on April 9, April 30, and May 23, 2019, to bring the previous year's surveys up to date and demonstrate the absence of special-status plants on the project site. Rare plants were not identified during the 2019 rare plant survey. Additional surveys were conducted on April 8, 2024, April 30, 2024, and May 14, 2024, and no rare plants were identified. In accordance with CDFW protocol, annual surveys are required until construction commences. Almost ten years of rare plant surveys have been completed on the project site and no rare plants have been observed. However, to comply with CDFW protocol, **COA BIO-7** has been imposed to require annual surveys be conducted until construction commences. As conditioned, development of the site would have no impact on special-status plant species.

Vernal Pool Plant Suitable Habitat

The Project will result in filling 0.06 acres of potentially suitable vernal pool habitat. Pursuant to the U.S. Fish and Wildlife Services' (USFWS) 2020 Programmatic Biological Opinion by and between the USFWS and the U.S. Army Corps of Engineers (Corps), impacts to "suitable vernal pool plant habitat" [i.e., seasonal wetlands] (even when 2 years of surveys proves absence), must nonetheless be mitigated by purchase of conservation credits. As a federal permit will be required for this project from the Corps, a federal nexus agency to the USFWS, pursuant to the USFWS' Recovery Plan for the Santa Rosa Plain, and current mitigation policy implemented by the USFWS, mitigation that compensates for impacts to "suitable seasonal wetland habitat" must be obtained from the *Limnanthes vinculans* (Sebastopol meadowfoam) Core Area.

In order to ensure compliance with the Programmatic Biological Opinion and General Plan General Plan Policy CON 1.7, **COA BIO-1** has been imposed. **COA BIO-1** requires the applicant to secure mitigation credits at a 1.5:1 ratio for Sebastopol meadowfoam (or as otherwise allowed by the Corps/USFWS) from the Sebastopol meadowfoam Core Area for the project's impacts to approximately 0.06 acre of "suitable vernal pool rare plant habitat.". **COA BIO-1** requires that rare plant conservation credits be approved by the USFWS prior to purchase and that the applicant provide proof that these conservation credits have been purchased to the City of Cotati prior to commencement of grading on the project site. With the implementation of **COA BIO-1** the project

would comply with General Plan Policy CON 1.7 and Action CON 1a and would not result in a new impact or increase the severity of an existing impact to vernal pool plants.

Special-status Animal Species

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

California Tiger Salamander (CTS)

The project site is located within the known range of the Sonoma County "Distinct Population Segment" (DPS) of the California tiger salamander. Under the FESA, the USFWS emergency listed the Sonoma County DPS as endangered on July 22, 2002. The USFWS formalized the listing of the Sonoma County DPS of the California tiger salamander as endangered on March 19, 2003 (USFWS 2003b).

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

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

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

According to the USFWS' 2020 Programmatic Biological Opinion, and as presented in the project-specific Biological Resources Analysis (**Appendix B**), impacts to over summering or migration habitat of the CTS are required to be mitigated at a 2:1 replacement to impacts ratio. Approximately 1.99 acres of the 5.63-acre project site is currently developed with buildings or hard-packed, gravel roadways and parking areas around buildings. These developed surfaces do not constitute CTS habitat and no mitigation is warranted for development of this area. However, the remaining 3.64 acres of the project site is considered potentially suitable habitat for CTS. The proposed project will result in development of the 5.63-acre site, including the 3.64 acres of potentially suitable CTS habitat. In order to compensate for the loss of potential CTS habitat, **COA BIO-2** has been imposed. **COA BIO-2** requires the applicant to seek an Incidental Take Permit (ITP) or a Consistency Determination from CDFW prior to commencing grading or site work and to secure CTS mitigation credit from a USFWS (and CDFW) approved Conservation Bank at a ratio of 2:1 (7.28 acres) or as otherwise directed by the regulatory agencies in accordance with the USFWS' Recovery Plan. As conditioned, the project would not increase the severity of an existing impact or result in a new impact to CTS and would comply with General Plan Policies CON 1.1-1.3.

Pallid Bat

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

The existing trees and the existing/abandoned residence on the northeast portion of the project site provide suitable roosting habitat for the pallid bat. If this species is present onsite, construction activities could impact pallid bat and in accordance with General Plan Action CON 1b, **COA BIO-3** has been imposed. **COA BIO-3** requires that a qualified biologist shall conduct a pre-construction survey of the structures and trees that would be impacted by the project 15 days prior to removal or commencement of ground work. If no special-status bats are found during the surveys, then building demolition and tree removal may commence in accordance with the procedures outlined in **COA BIO-3**. If young special-status bat species are found roosting on the project site, a non-disturbance buffer installed with orange construction fencing shall be established around the maternity site. Further, if adults are found roosting in a tree or structure on the project site but no maternal sites are found, then the adult bats can be flushed or one-way eviction doors can be used prior to the time the tree or structure in question would be removed or disturbed.

Nesting Raptors and Passerine Birds

Nesting raptors (birds of prey) and passerine (perching) birds are protected pursuant to California Fish and Game Code (Sections 3503, 3503.5, 3513), and the Federal Migratory Bird Treaty Act. The oaks present on the project site provide suitable nesting habitat for raptors and passerines. In addition, the grassland on the project site provides suitable nesting habitat for ground-nesting birds. Additionally, birds could nest on the abandoned buildings on the project site. Since typically most birds can fly out of harm's way, development of the project site would not be expected to harm adult birds. However, nesting birds are susceptible to "take" through disturbance that harms eggs or young. Therefore, in accordance with General Plan Action CON 1b, **COA BIO-4** has been imposed to avoid impacts to nesting birds. **COA BIO-4** requires conducting pre-construction nesting surveys and implementing avoidance measures.

Burrowing Owl

Burrowing owl habitat is usually found in annual and perennial grasslands, characterized by low-growing vegetation. Burrowing owls typically are not observed in grasslands with tall vegetation or wooded areas because vegetation obscures detection of avian and terrestrial predators. While the Project site provides ruderal vegetation/grassland habitat that could be used by western burrowing owls, the tall vegetation typical of the project site would discourage owls from nesting here. Further, this species has never been observed on the Project site even after many years of biological study.

The western burrowing owl is a subterranean nester that depends primarily on the presence of burrowing mammals that excavate and leave their burrows open such that the burrows are accessible to western burrowing owls. California ground squirrel (*Spermophilus beecheyi*) burrows are most commonly used by this owl throughout its nesting range in California.

In Sonoma County, California ground squirrel populations are scarce to non-existent. Accordingly, recorded burrow or burrow-like refugia on the Santa Rosa Plain more typically includes debris piles (e.g., downed wood, rock piles) and culvert openings, which do not constitute suitable owl nesting habitat. Based on the absence of suitable donor burrows for nesting and/or habitation, and the complete absence of California ground squirrels or other large burrowing animals on the project site, and the complete absence of field observations of western burrowing owls on the project site during multiple surveys conducted over nearly ten years, no impacts to this species are expected to occur from implementation of the proposed project.

Wetlands

One seasonal wetland occurs in a slight topographic low area in the northern portion of the project site. Monk & Associates biologists have examined this wetland in the winter months since it was originally documented in 2003/04. The wetland generally pools to a few inches deep before drying/draining and then refilling with successive larger storm events. A mix of common non-native and native upland and hydrophytic herbaceous species were observed within this seasonal wetland. No special status species were observed. Dominant species included annual semaphore grass (*Pleuropogon californicus*), Mediterranean barley (*Hordeum marinum ssp gussoneanum*), meadow foxtail (*Alopecurus pratensis*), pennyroyal (*Mentha pulegium*), Italian ryegrass (*Festuca perennis*), and hawkbit (*Leontodon saxitilis*). Other associated species included brown-headed rush (*Juncus phaeocephalus ssp. paniculatus*), English plaintain (*Plantago lanceolata*), prickly little sedge (*Carex echinata ssp. echinata*), tall flatsedge (*Cyperus eragrostis*), foothill clover (*Trifolium ciliolatum*), velvet grass (*Holcus lanatus*), curly leaved dock (*Rumex crispus*), and hairy cat's ear (*Hypochaeris radicata*). The shallow, highly disturbed and highly ephemeral nature of the seasonal wetland on the project site provides limited value for use by wildlife species.

An incised drainage ditch, containing mature oak trees is located west of the project site boundary and will not be modified by the proposed project. This feature is man-made, constructed to receive surface water runoff from paved and hardpacked surfaces. There is no contiguous flow pattern connecting this feature to other offsite drainages. The Corps' jurisdictional map identified the incised drainage ditch an as isolated feature. Large storm event sheet flows that collect in the offsite drainage ditch flow southward to a roadside ditch along the north side of SR-116, that then conveys flows westward of the project site.

The segment of roadside ditch along the frontage of the project site and in the offsite improvement areas along SR-116 were investigated as part of both the 2016/2017 and the 2018 wetland delineations conducted by M&A. The roadside ditch along the project site's frontage does not support wetland features and showed no evidence of standing water or flow patterns and thus likely only conveys water during large storm events. It also does not drain from wetlands. Thus, it was determined by the Corps on September 8, 2017, and again on May 21, 2018 (Attachments C and D), that the small roadside ditch along SR-116 within the proposed limits of the subject project including offsite improvement areas, does not support any jurisdictional "wetlands" or "other waters."

While the drainage ditches do not fall under Corps jurisdiction, the two ditches may fall under the jurisdiction of the State and subject to RWQCB jurisdiction. To ensure that the Project complies with General Plan Policy CON 1.9 and action CON 1g, **COA BIO-8** has been imposed and requires protection of waters of the State through exclusion fencing and avoidance, and the purchase of replacement credits if required.

On May 21, 2018, the U.S. Army Corps of Engineers confirmed jurisdiction over 0.06-acre of seasonal wetland onsite. The seasonal wetland is located in a topographic depression in the northern portion of the project site. This low area remains saturated/inundated throughout the winter as indicated by the dominance of hydrophytic vegetation, presence of hydric soils and indicators of wetland hydrology (i.e. presence of standing water, saturation and oxidized rhizospheres). During large storm events, this seasonal wetland overflows and conveys water overland east to the drain inlet along Alder Avenue where it enters the City's storm drain system. While federal regulations governing waters of the U.S. have changed since the 2017 and 2022 BRA were prepared, the U.S. Army Corps of Engineers (Corps) has stated that the 2018 Jurisdictional Determination prepared for the project site remains valid.

Consequently, the proposed project will result in the fill of approximately 0.06 acre of jurisdictional seasonal wetland regarded as waters of the U.S. and State subject to regulation by the Corps and the RWQCB. Therefore, **COA BIO-5** has been imposed, which requires the applicant to compensate for the loss of wetlands via the purchase of wetland mitigation credits from a Corps- and RWQCB-approved Wetland Conservation Bank and to provide proof of the purchase of wetland mitigation credits to the City of Cotati, the Corps, and the RWQCB in advance of grading activities on the project site.

As conditioned, the Project complies with General Plan Policy CON 1.2, CON 1.7, and CON 1.9, and Actions CON 1b and CON 1g and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to special-status species, sensitive natural communities nor jurisdictional waters relative to the 2013 General Plan EIR.

5.4(d) (Wildlife Movement) – No Change Relative to the General Plan EIR

The 2013 General Plan EIR determined that implementation of the General Plan could interfere with movement of native resident or migratory fish or wildlife species and those impacts would be less than significant.

The project site is immediately north of Gravenstein Highway (SR-116), a heavily-used commuter route, and west of Alder Avenue, both of which are pre-existing barriers to wildlife movement. In addition, the project site is surrounded by existing uses. As such, development of the project site will not impact any significant or regional wildlife corridor. The project site includes an existing developed and formerly developed parcel that has been subjected to disturbance over the past 20 years. Overall,

the project site is highly disturbed by grading and horticultural cultivation and does not serve as a wildlife movement or migration corridor. Therefore, the Project will not substantially interfere with the movement of any native species or native nursery site. Accordingly, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to wildlife movement relative to the 2013 General Plan EIR.

5.4(f) (Conflict with Policies, Ordinances, or Habitat Conservation Plan) – No Substantial Change Relative to the General Plan EIR

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

The USFWS 2020 Programmatic Biological Opinion is based on the biological framework presented in the Conservation Strategy. Projects that require a Corps permit, that remain consistent with objectives stated in the Conservation Strategy, can be appended to the Programmatic Biological Opinion at the discretion of the USFWS. Projects that are appended to the Programmatic Biological Opinion will be provided individual take authorization for impacts to federally-listed species.

The site-specific BRA determined that the Project site has a 0.06-acre seasonal wetland that will be filled as a result of the project. **COA BIO-5** requires the purchase of Conservation/mitigation credits in compliance with General Plan Action CON 1-A. Further, BIO-1 requires the purchase of plant mitigation credits in compliance with the Biological Opinion for the Santa Rosa Plain Conservation Strategy. As conditioned, the project complies with the Santa Rosa Plain Conservation Strategy and the General Plan Conservation and Open Space Element.

The City of Cotati tree ordinance, Cotati Municipal Code Chapter 17.54 regulates the protection, preservation and maintenance of native trees, trees of historic or cultural significance, groves and stands of mature tree, and mature trees in general that are associated with proposals for development. In compliance with this code, an Arborist Report was prepared by Horticultural Associates on April 30, 2024 (**Appendix C**) and a tree removal permit is being processed as part of the proposed Project. Conditions of the Tree Removal Permit will include tree replacement and preservation requirements in compliance with Chapter 17.54. To ensure compliance, **COA BIO-6** requires that the applicant comply with the preservation and replacement requirements and conditions of the Tree Removal Permit. As Conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to adopted policies, ordinances, or habitat conservation plans relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CON 1.1: Sensitive habitats include, wetlands, vernal pools, riparian areas, wildlife and fish migration corridors, native plant nursery sites, waters of the U.S., sensitive natural communities, and other habitats designated by state and federal agencies and laws.

Policy CON 1.2: Preserve and enhance those biological communities that contribute to the City's and the region's rich biodiversity including, but not limited to, annual grasslands, freshwater marshes, wetlands, vernal pools, riparian areas, aquatic habitat, and agricultural lands.

Status: The Project site includes an isolated wetland as well as a riparian area and is within the Satna Rosa Plain Conservation area. As such, **COA BIO-1** through **BIO-5** and **BIO-7** have been imposed on the project to replace any jurisdictional features impacted and to protect sensitive natural resources that may occur on the Project site. As conditioned, the Project complies with these policies.

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.

Status: The Project will result in the removal of five trees and will retain 36 trees onsite. To ensure that trees to remain are not damaged during construction, the project shall comply with the Tree Removal Permit pursuant to the City of Cotati Municipal Code Chapter 17.54, which regulates the protection, preservation and maintenance of native trees. Project approvals include a Tree Removal Permit which is conditioned for compliance with Chapter 17.54. **COA BIO-6** requires implementation of the conditions of the Tree Removal Permit. As conditioned, the Project complies with this policy.

Policy CON 1.7: Consult with all resource agencies during the CEQA review process for proposed developments to help identify wetland and vernal pool habitat that has candidacy for restoration, conservation, and/or mitigation. Focus restoration and/or conservation efforts on areas that would maximize multiple beneficial uses for such habitat and provides opportunities for mitigation banking.

Action CON 1a: Require development project proposals, infrastructure projects, long-range planning projects, and other projects that may potentially impact special-status species and sensitive resources to submit a biological resources evaluation which determines whether significant adverse impacts will occur. Evaluations shall be carried out under the direction of the Community Development Department and consistent with applicable state and federal guidelines. Projects shall be designed to avoid or reduce impacts to the maximum extent feasible. Where adverse impacts cannot be feasibly reduced or avoided through project design, projects shall include the implementation of site-specific or project-specific effective mitigation strategies developed by a qualified professional in consultation with state or federal resource agencies with jurisdiction (if applicable) that may include, but are not limited to, the following strategies:

a. Preservation of habitat and connectivity of adequate size, quality, and configuration to support the special-status species. Connectivity shall be determined based on the specifics of the species' needs.

b. Project design measures, such as clustering of structures or locating project features to avoid known locations of special-status species and/or sensitive habitats.

c. Provision of supplemental planting and maintenance of grasses, shrubs, and trees of similar quality and quantity to provide adequate vegetation cover to enhance water quality, minimize sedimentation and soil transport, and provide adequate shelter and food for wildlife.

d. Protection for habitat and the known locations of special-status species through adequate buffering or other means.

e. Provision of replacement habitat of like quantity and quality on- or off-site for special status species. Preference shall be given to the preservation of habitat as close to the area of impact as feasible, so long as that habitat is of comparable quality.

f. Enhancement of existing special-status species habitat values through restoration and replanting of native plant species.

g. Provision of temporary or permanent buffers of adequate size (based on the specifics of the special-status species) to avoid nest abandonment by nesting migratory birds and raptors associated with construction and site development activities.

h. Incorporation of the provisions or demonstration of compliance with applicable recovery plans for federally listed species.

i. Monitoring of construction activities by a qualified biologist to avoid impacts to on-site special status species.

Status: Annual surveys have taken place on the Project site beginning in 2015. A wetland delineation was prepared in 2017 and 2018 in accordance with the Army Corps of Engineers standard protocol. A Biological Resource Assessment was prepared by Monk and Associates on October 11, 2022 and a letter confirming the findings was prepared on June 3, 2024 (**Appendix B**). The BRA includes measures to ensure that the project will comply with all federal, state, and local regulations and provides recommended measures to comply with this policy and action.

Policy CON 1.9: Protect and enhance streams, channels, seasonal and permanent marshland, wetlands, sloughs, riparian habitat, and vernal pools through sound land use planning, community design, and site planning.

Status: A drainage ditch with native oak trees and riparian habitat runs along the western boundary of the Project site. The Project proposes to preserve this habitat area and all trees associated. To ensure that appropriate measures are taken to protect the riparian area and waters of the State, **COA BIO-8** has been imposed. **COA BIO-8** requires the installation of protective fencing during

construction around riparian areas that are planned to be retained under the proposed development. As conditioned, the project complies with this policy.

Conclusion and Environmental Conditions of Approval:

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to biological resources relative to what was identified in the 2013 General Plan EIR. The Project complies with the mitigating policies and actions in the 2013 General Plan and as such the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to biological resources relative to the 2013 General Plan EIR.

Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental conditions of approval are required to implement the 2013 General Plan EIR mitigating policies and actions:

COA BIO-1: In accordance with agency regulations and per the 2020 Programmatic Biological Opinion for the Santa Rosa Plain, vernal pool conservation credits shall be purchased for impacts to suitable Sebastopol meadowfoam habitat at a 1.5:1 ratio. Credits shall be purchased by the applicant and proof of purchase shall be provided to the City prior to the issuance of a grading permit.

COA BIO-2: Prior to issuance of a grading permit, California Tiger Salamander mitigation credits shall be purchased by the applicant from a USFWS approved Conservation Bank at a ratio of 2 square feet of mitigation for every square foot of upland habitat (2:1), and proof of purchase shall be provided to the City.

COA BIO-3: Prior to issuance of a demolition or grading permit (including removal of existing structures and trees), the project biologist shall perform bat roost emergence surveys no more than 7 days prior to the start of activities outside of the hibernation period (November 1 to March 1). Results of the survey shall be provided to the City of Cotati prior to commencing work. If bats are found, a bat exclusion plan shall be prepared and submitted to CDFW to include the following:

a. Bats shall be excluded between March 1 (once overnight low temperatures exceed 45 degrees Fahrenheit) and April 15, or between September 1 and October 15 to ensure no impact to maternity roosting occurs. Once bats have been fully excluded, the structure may be demolished or removed.
b. If a maternity roost is found, a replacement roost must be established either on-site or at a nearby off-site at a permanently protected location in consultation with CDFW.
c. Tree removal for trees greater than 16-inch dbh shall be performed using the three-step removal process. First the crown or upper 1/3 of the tree shall be removed and any limbs removed and left overnight. Next, the rest of the tree shall be felled and left overnight. On the third day, the biologist shall examine the felled tree to make sure any bats have escaped prior to chipping on-site or hauling to an off-site location for disposal.

COA BIO-4: To prevent any potential affects to nesting birds, the following actions shall be taken:

1. If construction begins between February 1 and August 31, a pre-construction nesting bird (both passerine and raptor) survey of the habitats within 500 feet of all work areas shall be performed within 7 days of groundbreaking. If no nesting birds are observed, no further action is required, and grading must occur within one week of the survey to prevent "take" of individual birds that could begin nesting after the survey. A follow-up survey is required if a stoppage in work occurs for longer than 7 days between February 1 and July 1.
2. If active bird nests (passerine and/or raptor) are observed during the pre-construction survey, a disturbance-free buffer zone shall be established around the nest tree(s) until the young have fledged or the nest has naturally failed or been predated, as determined by a qualified biologist. The radius of the required buffer zone can vary depending on the species, with the dimension of any required buffer zone to be determined by a qualified biologist.
3. To delineate the "no-work" buffer zone around a nesting tree, orange construction fencing must be placed at the specified radius from the base of the tree within which no construction related activity or machinery shall intrude.

COA BIO-5: Prior to issuance of a demolition, grading, or building permit, credits from a US Army Corps of Engineers- and Regional Water Quality Control Board-approved wetland mitigation bank shall be purchased by the applicant at a ratio of no less than 1:1 to compensate for the loss of waters of the U.S. and State, and proof of credits shall be provided to the City of Cotati.

COA BIO-6: Tree removal or unintentionally damaged trees shall be replaced in compliance with Chapter 17.54 Tree Protection ordinance. All contractors shall comply with and implement the Tree Protection measures established in the Planning Division's Project Conditions of Approval, specifically Conditions 7E and 11.

COA BIO-7: Rare plant surveys shall be conducted annually by a qualified biologist during appropriately timed blooming periods until construction commences on the project site. Results of rare plant surveys shall be submitted to the City prior to issuance of grading permit.

COA BIO-8: Indirect impacts to adjacent, offsite waters of the U.S./State shall be minimized to the maximum extent practicable by the use of best management practices (BMPs) that are installed prior to earth-work to protect waters of the U.S./State outside of the designated work areas. These practices shall include installing orange construction fencing, silt fencing, wildlife friendly hay wattles (that is, no monofilament netting), gravel wattles, and other protective measures between project activities and preserved offsite waters of the U.S./State. Orange construction fencing and other appropriate BMPs shall be installed along the riparian area located along the western boundary of the project site and the onsite construction areas. If the drainage ditch along SR-116 is to be preserved, orange construction fencing and other appropriate BMPs shall be installed during earthwork for all on and offsite improvements.

5.5. CULTURAL RESOURCES

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Public Works/Engineering Conditions of Approval prepared in February 29, 2024 and Cultural Resources Study, prepared by Tom Origer & Associates, June 23, 2016; Results of an Archaeological Study for the Gravenstein Highway (SR-116)/West Cotati Avenue Realignment Project prepared by Evans & De Shazo on September 28, 2023; and Cultural Resources Addendum for the Proposed Project at 7515 Alder Ave prepared by Evans and De Shazo on May 31, 2024.

2013 General Plan EIR Findings:

The 2013 General Plan EIR evaluated potential impacts to cultural resources in Chapter 3.4 and determined the following:

- Within the Cotati Planning Area, 36 resources have been recorded of which 7 are prehistoric Native American archaeological sites, and 2 are historic-period archeological sites, and 27 are built environment resources. 31 of these resources are within City limits.

- Impact 3.4-1: Implementation of the General Plan Update could result in the potential disturbance of cultural resources and human remains. This would be a potentially significant impact and is reduced to less than significant through policies CON 4.1, 4.3, 4.4, 4.5, and 4.6.

- Impact 3.4-2: Implementation of the General Plan Update could result in the disturbance of human remains or the discovery of human remains during construction activities. The potential impact would be reduced to less than significant through procedures of the Public Resources Code Section 5097 and implementation of General Plan actions CON 4c.

Project Consistency with the 2013 General Plan EIR

Consistent with General Plan Action CON 4b, a Cultural Resources Study (CRS) was prepared by Tom Origer & Associates on June 23, 2016 (**Appendix D.1 – Confidential**). The study included archival research, a Sacred Lands File (SLF) search, Tribal outreach, and a field survey. The CRS concluded that

the proposed development would not impact any known cultural resources, and the potential to encounter buried precontact period archaeological resources was low due to the Pleistocene epoch geological deposits within the study area (Franco and Beard 22016:7). As such, no site-specific recommendations were provided. While the CRS did not address the potential to encounter buried historic-period archaeological resources, an Addendum was prepared by Evans and De Shazo on May 31, 2024 (**Appendix D.2 – Confidential**) to include a historic-period buried archaeological site sensitivity desktop analysis, and Project-specific recommendations. These studies are relied upon to inform this analysis.

5.5(a-c) (Historic, Archaeological Resources and Discovery of Human Remains) – No Substantial Change Relative to the General Plan EIR

The Project area would have been suitable for hunting and extracting natural resources (i.e., task specific use) but was not likely conducive to seasonal or permanent occupation due to the distance from the nearest waterway. Based on the geology and soils of the site, the previous studies, and the records search, the Project Area has a low potential for buried precontact period archaeological resources. Regardless, in the event that prehistoric artifacts are encountered during project development, **COA CUL-1** has been imposed to ensure that the actions described by mitigating General Plan Action CON 4c are implemented.

The previously recorded cultural resources within the Project Area include a pre-1916 house and detached garage, both of which have been demolished. An existing house (Residence 2) constructed between 1954 and 1968 and detached garage are located within the property at 7515 Alder Avenue and would be demolished as part of the Project. The resources are not listed on the BERD and were previously determined ineligible for listing on the CRHR. Therefore, there are no known significant or potentially significant cultural resources on the project site.

However, prior to demolition, the Project Area contained a house that was constructed prior to 1916. Based on the former presence of the house, the Project Area has a moderate to high potential/sensitivity for buried historic-period archaeological resources. As such, **COA CUL-2** has been imposed and requires that a Secretary of the Interior qualified archaeologist prepare an Archaeological Monitoring Plan (AMP) and carry out archaeological monitoring of Project-related ground-disturbing activities.

As conditioned, the Project implements policies of the General Plan for treatment of cultural resources and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to cultural resources relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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.

Status: A Cultural Resource Study which included a cultural and archaeological survey was completed by Tom Origer & Associates on June 23, 2016. The study included archival research, a Sacred Lands File (SLF) search, Tribal outreach, and a field survey. The report did not address the potential to encounter buried historic-period archaeological resources and an Addendum was prepared by Evans and De Shazo on May 31, 2024. In the Addendum, a moderate to high potential for historic period resources was identified in association with the 1916 house and **COA CUL-2** has been imposed to require monitoring during Project-related ground-disturbing activities. As conditioned, the project complies with this policy.

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.

Status: COA CUL-1 requires implementation of Action CON 4c to address potential discovery of archeological resources and human remains during construction. As conditioned, the Project complies with this action.

Conclusion and Environmental Conditions of Approval:

The Project is within the scope of development projected under the General Plan and as conditioned, will not result in any substantial new or more severe impacts to cultural resources relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental conditions of approval are required to implement the 2013 General Plan EIR mitigating policies and actions:

COA CUL-1: In the event that cultural resources, human remains, or unique paleontological resources are inadvertently discovered during ground disturbing activities, the following conditions shall apply:

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.

    - If the skeletal remains are found to be prehistoric, Native American and not modern, then the coroner must call the Native American Heritage Commission in Sacramento that will designate the "Most Likely Descendant" (or MLD) of the discovered remains. The MLD will be responsible for recommending the disposition and treatment of the remains (before construction is resumed). Although the likelihood of encountering human skeletal remains in the project area seems slight, it is important to have a procedure for alternate tasks that can be put into effect quickly in the event that human remains are discovered. This allows for work to continue elsewhere on the project area (where appropriate given the size of the property and location of the discovery) while the remains are properly investigated.

c. If any prehistoric artifactual materials such as modified obsidian flakes or formed tools or concentrations of natural obsidian nodules are observed during any phase of grading or future construction on the property, all work in the vicinity of the find shall be stopped until the area of the discovery can be evaluated by an archaeologist. Depending on the extent and cultural composition of the discovered materials, subsequent excavation monitored by an archaeologist may be required, who shall be ready to record, recover and/or protect significant artifactual materials from further damage.

COA CUL-2: Prior to any ground disturbing activities, a Secretary of the Interior qualified archaeologist shall prepare an Archaeological Monitoring Plan (AMP) and provide the appropriate level of archaeological monitoring of ground-disturbing activities in the area shown on Figure 21 (pg. 34) of the Cultural Resources Study prepared by Evans and De Shazo on May 31, 2024. The AMP shall include the following provisions:

1. A pre-construction Cultural Resources Awareness Training (CRAT) and details regarding the types of archaeological resources that could be found within the Project Area, and the procedures to follow should any archaeological material be encountered, including proper notification to Tribes, agencies, and stakeholders, and for an assessment of the significance of any archaeological resources encountered during construction shall be provided.
2. The archaeological monitor shall be empowered to halt construction activities at the location of a discovery to review possible archaeological material and to protect the resource while the find is being assessed.

3. Monitoring shall continue until the Secretary of Interior-qualified archaeologist determines that full time monitoring of specific excavation activities or in specific areas of the Project can be reduced to spot check monitoring or that monitoring is no longer warranted.
4. A report shall also be prepared by the monitor that documents findings after the ground disturbance is complete and submitted to the City.

5.6. ENERGY

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; BAAQMD 2017 Bay Area Clean Air Plan; Climate Action 2020 and Beyond: Sonoma County Regional Climate Action Plan, prepared by Sonoma County Regional Climate Protection Authority, July 2016; BAAQMD 2017 CEQA Guidelines; and City of Cotati Municipal Code.

2013 General Plan EIR Findings:

Energy resources include fuels, renewable resources, and production of electricity which requires conversion of these resources into energy. Energy production and energy use result in depletion of non-renewable energy resources such as oil, coal, and natural gas, the use of which results in pollutant emissions that contribute to global climate change. Sustainable use of energy resources is facilitated through conservation of non-renewable resources and development of alternative or renewable energy resources such as solar, wind, and geothermal.

The 2013 General Plan EIR analyzed the impacts to energy resources in Chapter 3.6 – Greenhouse Gasses and Climate Change. The policies and implementing actions relating to energy conservation are included in Chapter 5: Conservation of the General Plan and addressed under Goal 3 which promotes conservation of energy and other natural resources. The 2013 General Plan EIR specifically identifies the following energy-specific General Plan Policies CON 2.10, CON 3.1 – CON 3.10, LU 1.5, and Actions CON 3a – 3d which would result in a less than significant impact to Green House Gas Emissions and Climate Change and are applicable to this section.

Sonoma County Climate Action Plan 2020

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

As presented in the Climate Action Plan 2020, Section 5.2: Cotati, the City of Cotati is focused on infill development and "green" priorities for new building. Energy efficiency is a requirement of City of Cotati's General Plan as provided in General Plan Objective Con 3A, including policies and actions which "achieve a high level of energy efficiency in new buildings and in significant remodels," which is set forth in Municipal Code Chapter 14.04.130 and establishes CalGreen Tier 1 as mandatory for new residential and non-residential structures.

Cotati Municipal Code

The Project will construct new dwelling units and commercial uses that are subject to Title 24 of the California Building Code and must meet the requirements for CalGreen Tier 1. In order to secure a building permit, the Project must comply with the uniformly applied standards of the City's Municipal Code Section 14.04.090 California Energy Code and Section 17.51.030 Citywide Energy Conservation Standards and which requires that the new structures be designed and constructed to achieve a minimum of fifteen percent greater energy efficiency than otherwise required by the California Code of Regulations, Title 24, and to implement the city's sustainable building program adopted by council resolution.

Project Consistency with the 2013 General Plan

5.6(a) (Energy Consumption) – No Substantial Change Relative to the General Plan EIR

The Project proposes new residential and commercial uses which will be served by Pacific Gas and Electric and Sonoma Clean Power.

The California Green Building Standards Code, otherwise known as the CALGreen Code (CCR Title 24, Part 11), is a portion of the California Building Standards Code (CBSC). The purpose of the CALGreen Code 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 reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The provisions of the code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout California. Requirements of the CALGreen Code include, but are not limited to, the following measures:

- Installation of Electric Vehicle (EV) charging infrastructure in residential and non-residential structures;
- Maximum fixture water use rates;
- Compliance with the California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), or a local ordinance, whichever is more stringent;
- Diversion of 65 percent of construction and demolition waste from landfills;
- Mandatory use of low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particle board; and
- For single-family and some low-rise residential development developed after January 1, 2020, mandatory on-site solar energy systems capable of producing 100 percent of the electricity demand created by the residence(s).

The 2022 Building Energy Efficiency Standards went into effect on January 1, 2023, and establishes new requirements related to heat pumps, requires that new single-family homes be electric-ready,

and expands solar and storage requirements. It is estimated that over a 30-year period, the 2022 energy code will reduce greenhouse gas (GHG) emissions by 10 million metric tons.[2]

Further, the City has adopted CALGreen Tier 1 standards and as such, they are uniformly applied to all construction projects. The application of these standards to the Project will prevent wasteful, inefficient, or unnecessary consumption of energy resources. Additionally, the BMPs required by the BAAQMD and implemented as **COA AQ-1** and the construction Emissions Management Plan required by **COA AQ-2** limit the use of energy for construction. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact related to energy consumption.

5.6(b) (Conflict with State or Local Plans) – No Substantial Change Relative to the General Plan EIR

Pursuant to the Sonoma County Climate Action Plan 2020, Section 5.2: Cotati, the City of Cotati is focused on infill development and "green" priorities for new building. The Project is proposed within Cotati's planning area within the existing city limits and will comply with the uniformly applied energy conservation standards of CALGreen Tier 1 at a minimum. Additionally, the Project proposes all electric appliances and as conditioned by **COA GHG-1**, will meet CALGreen Tier 2 requirements for installation of EV infrastructure. As such, the Project would not conflict with state or local plans for renewable energy or energy efficiency. Therefore, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact.

2013 General Plan EIR Mitigating Policies and Actions

Action CON 3a: Continue to review development projects to ensure that all new public and private development complies with CALGreen Tier 1 standards as well as the energy efficiency standards established by the General Plan and Land Use Code.

Status: The proposed Project is subject to the uniformly applied development standards in the Municipal Code Section 17.51.030 (Citywide energy conservation standard), CALGreen Tier 1 and the California Code of Regulations, Title 24, at a minimum. As conditioned by **COA GHG-1**, the project is required to comply with CALGreen Tier 2 EV Charging infrastructure. As such, it complies with this action and would not result in a new significant impact or substantially increase the severity of a previously identified significant impact.

Conclusion

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to energy relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. **COA AQ-1** and **COA GHG-1** will implement requirements of the 2013 General Plan EIR and the General Plan.

[2] State of California, Energy Commission, 2022 Building Energy Efficiency Standard Summary, August 2021.

5.7. GEOLOGY AND SOILS

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
I. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Publication 42.	☐	☐	☐	☒
II. Strong seismic ground shaking?	☐	☐	☒	☐
III. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
IV. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

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

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Geotechnical Feasibility Evaluation prepared by Miller Pacific Group on April 15, 2015; Geotechnical Feasibility Letter prepared by Miller Pacific Engineering Group on April 17, 2024; Initial Stormwater Low Impact Development Submittal prepared by Civil Design Consultants on February 1, 2024; Preliminary Hydrology & Hydraulics Report prepared by Civil Design Consultants on February 1, 2024; and Public Works/Engineering Conditions of Approval prepared in February 29, 2024.

2013 General Plan EIR Findings

The City of Cotati is in a geologically active area of the San Andreas Fault system and the potential for ground shaking from seismic events is a risk throughout the region. Active faults are located four miles or more to the east, north, and west, but no active faults traverse the City.

The 2013 General Plan EIR evaluated the potential impacts related to geology and soils in Chapter 3.5 and determined the following.

- Impact 3.5-1: Implementation of the General Plan Update would result in the construction of projects that may expose people or structures to seismic ground shaking from the numerous faults located in the region. No Alquist-Priolo Fault Zones are located within the Cotati Planning Area. The General Plan includes policies and actions that require evaluation and engineering of projects to reduce the impacts of development under the General Plan from seismic shaking to less than significant.

- Impact 3.5-2: Implementation of the General Plan Update would allow ground disturbing activities that could result in soil erosion and topsoil loss. The Regional Water Quality Control Board requires that project-specific Storm Water Pollution Prevention Plan (SWPPP) to be prepared for all development projects. Application of best management practices required would reduce this impact to less than significant.

- Impact 3.5-3: Implementation of the General Plan Update would result in development that could expose people and structures to adverse effects from ground instability and failure from landslides, lateral spreading, subsidence, liquefaction, or collapse. With General Plan policies and implementing actions applied to development projects that require study and design to mitigate these risks, the impacts would be less than significant.

- Impact 3.5-4: There is expansive soil located within the City of Cotati, and implementation of the proposed project (General Plan Update) could result in development on expansive soils. With General Plan policies that require design-level geotechnical investigations for new development, the risk of impacts from expansive soils would be less than significant.

- Impact 3.5-5: Implementation of the General Plan Update would not result in a conflict between soil capacity and septic systems because sewerage and wastewater treatment capacity is sufficient to accommodate all development under the General Plan without the use of septic and none will be utilized. Therefore, this impact is less than significant.

The 2013 General Plan EIR found that the implementation of the 2013 General Plan could have significant impacts on Geology and Soils but determined that those impacts were mitigated to less than significant through the implementation of Policies CSF 1.8, SA 2.1- 2.11 and Actions SA 2a-2k.

Project Consistency with the 2013 General Plan EIR

A Geotechnical Feasibility Evaluation was prepared by Miller Pacific Engineering on April 15, 2015 for the Project site and updated on April 17, 2024 and is relied upon to inform this analysis.

5.7(a i, iv) (Seismic Faults, Landslides) – No Change Relative to the General Plan EIR

Within the Bay Area, faults are concentrated along the San Andreas Fault zone. The movement between rock formations along either side of a fault may be horizontal, vertical, or a combination and is radiated outward in the form of energy waves. The amplitude and frequency of earthquake ground motions partially depends on the material through which it is moving. The earthquake force is transmitted through hard rock in short, rapid vibrations, while this energy movement becomes a long, high-amplitude motion when moving through soft ground materials, such as bay mud.

The Project site is not located within an Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist on the site. However, the project site is located within a seismically active area and will therefore experience the effects of future earthquakes. However, the risk of fault offset at the site is very low. Further, the Project is subject to construction standards established for seismic safety within the latest California Building Code, which would minimize the impact of a seismic event on new development.

The Project site is a relatively flat and undeveloped open field with ruderal vegetation, some small shrubs, and mature trees. Because steep slopes are not located on the site, there is no risk of a landslide. As such the project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to seismic faults or landslides relative to the 2013 General Plan EIR.

5.7(a ii-iii, c,d) (Ground Shaking, Liquefaction, Geologic Stability, and Expansive Soils) – No Substantial Change Relative to the General Plan EIR

The Geotechnical Feasibility Evaluation found that strong to very strong ground shaking could occur at the site during a large earthquake on one of the nearby faults. The intensity of earthquake motion would depend on the characteristics of the generating fault, distance to the fault and rupture zone, earthquake magnitude, earthquake duration, and site-specific geologic conditions. The most likely source for earthquakes close to the site is the Rodgers Creek Fault.

In accordance with Action SA 2a and 2e, a Feasibility Evaluation was prepared**.** The Feasibility Evaluation recommended that a design-level Geotechnical Investigation be prepared for the project. As such, **COA GEO-1** has been imposed and requires a geotechnical investigation with subsurface exploration and laboratory testing as well as implementation of the design-level recommendations in the final design plans.

Liquefaction refers to the sudden, temporary loss of soil strength during strong ground shaking. This phenomenon can occur in saturated, loose, granular deposits when they are subjected to seismic shaking. Liquefaction related phenomena include seismically induced settlement, flow failure, and lateral spreading. The anticipated subsurface conditions include variable alluvial deposits. Alluvial

deposits typically consist of layers of clayey, sandy and gravelly soils. The granular layers may be susceptible to liquefaction. The Geotechnical Feasibility Evaluation concluded that the site has very low potential of liquefaction but recommended that subsurface exploration be performed to confirm the absence of loose, saturated granular layers as required by **COA GEO-1.**

The Geotechnical Feasibility Analysis did not identify 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, or collapse. However, **COA GEO-1** has been imposed and through implementation, any potentially unstable site conditions will be identified and addressed through design-level recommendations.

Expansive soils can change volume (shrink & swell) with seasonal changes in moisture content. The Geotechnical Feasibility Analysis found that the site to have low to moderate expansive potential and that further investigation was needed. Through **COA GEO-1** an analysis of the soils and design-level recommendations will be implemented to identify the presence of expansive soils and recommend appropriate treatments to avoid risks.

COA GEO-1 requires a geotechnical investigation to evaluate sub-surface conditions and provide recommendations for development prior to issuance of a grading or building permits. Review of construction level plans and geotechnical recommendations will be conducted as part of the Building Permit review process to confirm consistency of final plans with Building Code's uniformly applied standards. **COA GEO-1** also requires the Project's engineer to inspect the construction work and certify to the City that the improvements have been constructed in accordance with the results of the Geotechnical Investigation.

As conditioned, and through the uniformly applied standards of the California Building Code, the project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to ground shaking, liquefaction, the stability of a geologic unit, or expansive soils relative to the 2013 General Plan EIR.

5.7(b) (Erosion) – No Substantial Change Relative to the General Plan EIR

The Project site is previously disturbed from past grading and development. As a project that will disturb more than 10,000 square feet of impervious surfaces, it is subject to implementation of stormwater management facilities to treat site runoff under applicable provisions of the City's MS4 permit. In compliance with General Plan Policy CON 1.12, a preliminary soil and erosion control plan has been prepared and **COA HYD-1** has been imposed that requires Best Management Practices are implemented during construction. Additionally, Chapter 14.36 of the Cotati Municipal Code requires an erosion control plan prepared by a Civil Engineer or other qualified professional that outlines appropriate measures to minimize soil erosion and sedimentation and that complies with design and construction standards contained in the City's Municipal Code. Preliminary designs have been reviewed and determined to be in general compliance by the City Engineer. The final plans will be reviewed by the City Engineer and subject to Project conditions of approval. Uniformly applied engineering conditions include a requirement for a Stormwater Pollution and Prevention Plan (SWPPP) as well as a Stormwater Control Plan and a separate Rain Event Action Plan (REAP) to be used during construction.

As conditioned, the project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to erosion relative to the 2013 General Plan EIR.

5.7(e) (Septic Tanks) – No Change Relative to the General Plan EIR

Implementation of the Project would not result in a conflict between soil capacity and septic systems because sewage conveyance and wastewater treatment capacity is sufficient to accommodate the Project and no septic systems are planned as part of the development. The Project proposes to connect to the City's sewer system and will not use septic systems. As such, the Project is consistent with the General Plan and would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to or from septic tanks relative to the 2013 General Plan EIR.

5.7(f) (Paleontological Resources) – No Substantial Change Relative to the General Plan EIR

The potential to uncover paleontological resources was considered in the 2013 General Plan EIR, in which Action CON 4c is identified, and requires work to be suspended within 100 feet of any discovered potentially unique paleontological resources and for the City to be contacted to coordinate further investigation. In compliance with Action CON 4c, **COA CUL-1** is required. **COA CUL-1** requires specific protocol to be followed if cultural or paleontological resources are encountered during ground disturbing activities.

As conditioned, the Project is consistent with the General Plan and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to paleontological resources relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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 (See Figure 7.1-2 in the General Plan Background Report).

Status: In accordance with this Policy, a Geotechnical Feasibility Analysis was prepared by Miller Engineering on April 15, 2015, and updated on April 17, 2024. The analysis determined that the Project site has a very low susceptibility for liquefaction and recommends that engineering standards be imposed to address stability based on a design level Report. Accordingly, **COA GEO-1** has been imposed and requires that a design level geotechnical investigation to be prepared and include design-level recommendations for construction. The report will be submitted for review and acceptance by the City Engineer to ensure the safety and stability of all improvements. As conditioned, the project complies with this policy.

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.

Status: Development of the Project will require site preparation and grading activities that will potentially result in soil erosion or the loss of topsoil if not properly controlled. A preliminary soil and erosion control plan has been submitted by the applicant and **COA HYD-1** requires the applicant to

submit and Engineering to accept a final erosion and sediment control plan in compliance with Chapter 14.36. As conditioned, the Project complies with this Policy.

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.

Action SA 2a: Require a geotechnical analysis for construction in areas with potential geological hazards and require that recommendations from the geotechnical analysis are incorporated into the project's design and engineering.

Action SA 2e: Require the submission of geologic and soils reports for all new developments. The geologic risk areas that are determined from these studies shall have standards established and recommendations shall be incorporated into development.

Status: As noted above, A Geotechnical Feasibility Analysis for the Project site was prepared on April 15, 2015, and updated on April 17, 2024 by Miller Pacific Engineering Group. **COA GEO-1** requires that design-level recommendations be incorporated into the final plans prior to issuance of grading or building permits and inspection and certification of improvements by the Project's engineer. As conditioned, the project complies with this policy and associated actions.

Conclusion and Environmental Conditions of Approval:

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to geology and soils relative to what was identified in the 2013 General Plan EIR. As conditioned and through the application of uniformly applied standards, the Project complies with the applicable policies and actions in the 2013 General Plan and would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to geology and soils relative to the 2013 General Plan EIR.

Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances, that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental condition of approval is required to implement the 2013 General Plan EIR mitigating policies and actions:

COA GEO-1: Prior to issuance of a grading or building permit, the applicant shall submit a geotechnical investigation report for review and acceptance by the Chief Building Official and/or the City Engineer. The report shall include design-level recommendations, which shall be incorporated into the final project plans.

At the time of permit application submittal, the applicant shall include a letter, together with the geotechnical analyses, from the Project's geotechnical engineer certifying that all recommendations in the Project's geotechnical analyses meet current geotechnical design standards and that all applicable recommendations have been incorporated into the construction plans. Where the geotechnical engineer recommends technical changes to the recommendations in any of the geotechnical analyses, such changes shall be clearly identified in the letter.

The Project's geotechnical engineer shall inspect the construction work and shall certify to the City, prior to issuance of a certificate of occupancy, that the improvements have been constructed in accordance with the geotechnical analyses.

5.8. GREENHOUSE GAS EMISSIONS

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; BAAQMD CEQA Guidelines, April 2022; and Air Quality and Greenhouse Gas Assessment by Illingworth and Rodkin on June 5, 2024.

2013 General Plan EIR Findings

The 2013 General Plan EIR evaluated potential impacts to air quality and determined that with implementation of General Plan Policies and Actions that mitigate potential impacts, impacts to air quality would be less than significant. The following impacts to air quality were considered under the 2013 General Plan EIR:

- Impact 3.6-1: General Plan implementation could generate GHGs, either directly or indirectly, that may have a significant effect on the environment. Through the implementation of mitigating General Plan Policies CON 2.6 – CON 2.12, CON 3.1 – CON 3.6, CON 3.8 – CON 3.12, CI 1.2, CI 1.19 – CI 1.21, CI 2.1 – CI 2.3, CI 2.7 – CI 2.10, CI 2.21, CI 3.1 – CI 3.4, LU 1.4, LU 1.5, LU 2.2, LU 2.5, LU 2.10, LU 3.8, OS 1.1 – OS 1.6, OS 1.10, OS 1.11 and Actions CON 2e, CON 2f, CON 2g, CON 3a – CON 3d, CI 1q, CI 2a, CI 2i – CI 2k, CI 3a, CI 3b, LU 2b, and OS 1a – OS 1e, implementation of the General Plan would have a less than significant impact.

- Impact 3.6-2: Implementation of the General Plan would not an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The General Plan is consistent with the CCAP and AB 32 and as new projects are required to fully implement the City's Green Building Standards. Compliance with the City's Green Building Standards would reduce GHG emissions from future development to the greatest extent feasible and implementation of the General Plan would have a less than significant impact.

A number of regulations currently exist related to GHG emissions, predominantly AB 32, Executive Order S-3-05, and Senate Bill (SB) 32. AB 32 sets forth a statewide GHG emissions reduction target of 1990 levels by 2020. Executive Order S-3-05 sets forth a transitional reduction target of 2000 levels by 2010, the same target as AB 32 of 1990 levels by 2020, and further builds upon the AB 32 target by requiring a reduction to 80 percent below 1990 levels by 2050. SB 32 also builds upon AB 32 and sets

forth a transitional reduction target of 40 percent below 1990 levels by 2030. To implement statewide GHG emissions reduction targets, local jurisdictions are encouraged to prepare and adopt area-specific GHG reduction plans and/or thresholds of significance for GHG emissions.

Bay Area Management District 2022 Greenhouse Gas Thresholds

On April 20, 2022, the BAAQMD Air District Board of Directors adopted the proposed CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects. Consistent with CEQA Guidelines Section 15064 (Determining the Significance of the Environmental Effects Caused by a Project), the thresholds are intended to assist public agencies in determining whether projects would result in a cumulatively considerable contribution to global climate change. The adopted thresholds are intended to evaluate projects based on their effect on efforts to meet the State's long-term climate goals. As determined by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife,* a project would be considered to have a less than significant air quality impact under CEQA so long as it contributes its fair share toward achieving long-term climate goals. As such, new land use development projects are required to either (A) incorporate design elements including replacing natural gas with electric power, eliminating inefficient or wasteful energy usage, reducing project-generated VMT to the recommended 15-percent reduction below existing, and providing sufficient electric vehicle (EV) charging infrastructure to support the shift to EVs or (B) must comply with a qualified local GHG reduction strategy.

The BAAQMD uses a "fair share" approach for determining whether an individual project would have an effect on the environment. The "fair share" approach requires that projects are incorporating design elements that will reduce emissions and thus contribute toward achieving long-term climate goals to reduce emissions. These are stated as:

Table 5.6: Climate Impact Thresholds of Significance (Project Level)

Thresholds of Significance for Land Use Projects (Must Include A or B)
A. Projects must include, at a minimum, the following project design elements:
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 CEQA Section 21100(b)(3) and Section 15126.2(b) of the State 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

b. The project will achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Source: BAAQMD, 2022 CEQA Guidelines Thresholds of Significance, April 20, 2022

Sonoma County Climate Action Plan 2020

As presented in the Sonoma County Climate Action Plan 2020, the City of Cotati's GHG inventory in 2010 resulted in the emission of 52,060 metric tons of CO2e per year (MT CO2e/yr) and a per capita emission level of 7.2 MT CO2e/yr. A backcast effort identified 1990 emission levels at 51,480 MT CO2e/yr and a per capita emission level of 9.0 MT CO2e/yr. **Table 5.7** presented below provides the forecast emission levels for the City of Cotati.

Table 5.7: GHG Emission Forecasts

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

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

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

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

Project Consistency with 2013 General Plan EIR

The Air Quality and Greenhouse Gas Assessment prepared by Illingworth and Rodkin, dated June 5, 2024 (**Appendix A**) is relied upon to inform this analysis.

5.8(a) (Greenhouse Gas Generation) – No Substantial Change Relative to the General Plan EIR

Construction GHG emissions are short-term and will cease once construction is complete. As stated in Section 5.3 Air Quality of this document, **COA AQ-1 and AQ-2** are imposed on the project and are consistent with the BAAQMD and 2013 General Plan Policies and as conditioned and the Project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

Annual GHG emissions resulting from operation of the proposed project are predicted to be 1,488 MT of CO2e in 2026.

As discussed above in Section 5.6 Energy, the Project is subject to the California Building Code and CalGreen Energy Code. The City has adopted Tier 1 voluntary measures of CalGreen which are required for all new construction. As determined in the Energy section, the Project would not result in any wasteful, inefficient, or unnecessary energy. As described above, BAAQMD requires the implementation of specific project design elements in order to be considered below the threshold of significance. The project's incorporation of these design elements are as follows:

1. The Project will not include natural gas appliances or natural gas.
2. The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
3. A Traffic Impact Analysis conducted by W-Trans on June 15, 2023 concluded that the project will have a VMT rate (14.6) below the threshold of significance (15.5).

However, the Project design includes providing EV parking spaces as required by Cotati Municipal Code 14.04.130 to meet the CalGreen Tier 1 requirements for including EV charging infrastructure. As Tier 1 requirements are lower than Tier 2 requirements, and Tier 2 is the threshold, **COA GHG-1** is imposed to require that the Project adhere to the requirements of CalGreen Tier 2.

As designed and conditioned, and through the application of the uniformly applied standards in the City of Cotati Building Code, the project is below the threshold of significance for land use projects as established by BAAQMD. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to greenhouse gas emissions relative to the 2013 General Plan EIR.

5.8(b) (Conflict with Plans) – No Substantial Change Relative to the General Plan EIR

The Project will construct residential units and commercial floor area on a site that is planned for such uses under the General Plan. The proposed Project is consistent with applicable local plans, policies, and regulation related to GHG emissions and does not conflict with the stipulations of AB 32, the applicable air quality plan, or any other State or regional plan, policy, or regulation of an agency for the purpose of reducing greenhouse gas emissions.

The Project is consistent with applicable local plans, policies, and BAAQMD regulation related to GHG emissions and as designed and as conditioned by **COA GHG-1**, **COA AQ-1** and **COA AQ-2** does not conflict with an applicable air quality plan, or any other State or regional plan, policy, or regulation of an agency for the purpose of reducing greenhouse gas emissions. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Action CON 3a: Continue to review development projects to ensure that all new public and privately development complies with CALGreen Tier 1 standards as well as the energy efficiency standards established by the General Plan and Land Use Code.

Status: The Project is subject to the uniformly applied standards of CALGreen Tier 1 which will be reviewed and confirmed prior to issuance of a building permit. Additionally, in order to comply with the thresholds of the BAAQMD CEQA Guidelines, **COA GHG-1** requires compliance with CALGreen Tier 2 EV parking infrastructure. As such, the Project is consistent with this policy.

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

Status: The uniformly applied standards of the California Building Code require that all new construction includes solar panels. As such, the Project is consistent with this policy.

Policy CON 3.6: Ensure that street layout and design minimizes the use of pavement to the greatest extent feasible in order to reduce cooling energy needs.

Status: The Project does not propose any additional paving other than that which is necessary for roads, sidewalks, common areas, and parking. As such, the proposed Project is consistent with this policy.

Policy CON 3.10: Ensure that the layout and design of new development and significant remodels encourages the use of transportation modes other than automobiles and trucks.

Policy LU 2.5: Locate medium and higher density housing within easy walking or bicycling distance of public facilities, services, transit, and major employers.

Status: The Project proposes the development of higher density housing and includes the construction of a Class I Multiuse Path at the SR-116 frontage and bicycle parking within the site as well as an internal network of bike and pedestrian pathways. An existing bus stop is located at the on the frontage along SR-116. As such, the project is consistent with Policies CON 3.10 and LU 2.5.

Policy OS 1.10: Require residential development, with the exception of rural and low density residential, to be contiguous to existing urban development.

Status: The Project is located on a site that has been planned for urban development. Existing urban development includes the Cotati Commons residential development to the northeast, retail uses to the west, as well as other commercial uses on the south side of SR-116. A recently approved mixed-use residential development (Cotati Villages 1) has been approved on a site east of the Project. As such, the project complies with this policy.

Action CON 2e: Continue to review new development, significant remodels, and infrastructure projects for consistency with the Sonoma County Community Climate Action Plan and Greenhouse Gas Reduction and Implementation Plan (GRIP).

Status: The Proposed Project is subject to Measure 11-L1 (Senate Bill SB X7-7 – Water Conservation Act of 2009) and Measure 2-L1 (Solar in New Residential Development) which are identified to reduce the City of Cotati's greenhouse gas emissions in the Climate Action Plan. As the Project shall

comply with water conservation and solar energy installation requirements, the Project is consistent with Policy OS 1.10 and Action CON 2e.

Conclusion and Environmental Conditions of Approval

The Project is within the scope of development projected under the General Plan and as conditioned will not result in any substantial new or more severe impacts to Greenhouse Gas Emissions relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. **COA AQ-1** and **COA AQ-2** as well as the following environmental conditions of approval are required to implement the 2013 General Plan EIR mitigating policies and actions:

COA GHG-1: The applicant shall submit final plans that include electric vehicle charging infrastructure in compliance with CalGreen Tier 2 Voluntary Measures. Plans shall be reviewed and confirmed for compliance by the City of Cotati Building Department prior to issuance of an occupancy permit.

5.9. HAZARDS/HAZARDOUS MATERIALS

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport of public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of	☐	☐	☐	☒

loss, injury or death involving wildland fires?

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Health and Safety Code Section 25501(n)(1); Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021, prepared by Tetra Tech Consultants for Permit Sonoma, October 2021; Phase I Environmental Site Assessment, prepared by Harris and Lee Environmental Sciences, LLC on August 3, 2011; GeoTracker, managed by the State Water Resources Control Board, accessed May 20, 2024; and EnviroStor, managed by the Department of Toxic Substances Control, accessed May 20, 2024; Memorandum from Rancho Adobe Fire Protection District prepared on February 14, 2024; Public Works/Engineering Conditions of Approval prepared in February 29, 2024; and City of Cotati Municipal Code.

2013 General Plan EIR Findings

The 2013 General Plan EIR evaluated potential impacts related to hazards and hazardous materials and determined that with implementation of General Plan Policies and Actions that mitigate potential impacts, impacts would be less than significant. The following impacts related to hazards and hazardous materials were considered under the 2013 General Plan EIR:

- Impact 3.7-1: The General Plan has the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Through the implementation of mitigating General Plan Policies CSF 3.7, CSF 3.8, SA 1.1 – SA 1.7 and Actions CSF 3d, SA 1a – SA 1i, implementation of the General Plan would have a less than significant impact.

- Impact 3.7-2: The General Plan has the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Through compliance with all existing regulations and hazard mitigation plans as well as the implementation of mitigating General Policies CSF 3.7, CSF 3.8, SA 1.1 – SA 1.7 and Actions CSF 3d, SA 1a – SA 1i, implementation of the General Plan would have a less than significant impact

- Impact 3.7-3: The General Plan has the potential to have projects located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Through Compliance with state and federal regulations and the implementation of mitigating General Plan Policies CSF 3.7, CSF 3.8, SA 1.5, SA 1.7, SA 1.9 and Actions CSF 3d, implementation of the General Plan would have a less than significant impact.

- Impact 3.7-4: The General Plan is not located within an airport land use plan, two miles of a public airport or public use airport, or within the vicinity of a private airstrip, and would not result in a safety hazard for people residing or working in the project area. The City of Cotati does not have any airport facilities located within the city limits, sphere of influence, of urban growth boundary. The City of Cotati does not lie within the Runway Protection Zone, Inner/Outer Safety Zones, Inner Turning Zone, Sideline Safety Zone, or Traffic Pattern Zone for this airport. According to the National Transportation Safety Board Aviation Accident Database, there have been no accidents within the City of Cotati between January of 1950 to January 2014. Therefore, implementation of the General Plan would have a less than significant impact.

- Impact 3.7-5: The General Plan does not have the potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Through the implementation of mitigating General Plan Policies SA 1.1 – SA 1.6 and Actions SA 1a – SA 1i, implementation of the General Plan would have a less than significant impact.

- Impact 3.7-6: The General Plan does not have the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Through the implementation of mitigating General Plan Policies CSF 2.28 – 2.32, CSF 2.36, SA 1.1 – SA 1.7 and Actions CSF 2o, CSF 2p, SA 1a, and SA 1d, implementation of the General Plan would have a less than significant impact.

Sonoma County Hazard Mitigation Plan

On September 28, 2021, the City Council of the City of Cotati adopted the Sonoma County Multijurisdictional Hazard Mitigation Plan to guide pre- and post-disaster mitigation of identified hazards. The plan includes actions to mitigate current risk from hazards and changes in hazard impacts resulting from climate change. Through the County-wide plan, the City will coordinate strategies for hazard mitigation with other planning programs under its jurisdiction, as well as promote and support the mitigation strategies of all County partners.

Project Consistency with the 2013 General Plan EIR

A Phase I Environmental Assessment was prepared for the Project site by Property Solutions Inc on August 3, 2011 (**Appendix E**) and is relied upon to inform this analysis.

5.9(a-b) (Routine Transport, Use, Disposal, or Release of Hazardous Materials) – No Substantial Change Relative to the General Plan EIR

The 2013 General Plan EIR concluded that implementation of the General Plan would result in less than a significant impact relative to the use, storage, and transport of hazardous materials, that accidental release could constitute a hazard to the public or the environment.

The Project would not include routine transport and management of hazardous materials in ongoing operations. Development consists primarily of new residential units, and the commercial component of the project is limited to a café, both of which may involve the use, storage, handling, or transportation of routine hazardous materials such as cleaning supplies. The future business is subject to City review prior to issuance of a business license and would be required to comply with all existing federal, state, and local safety regulations governing the use of potentially hazardous materials.

Construction activities of the subject Project may result in the temporary presence of potentially hazardous materials including, but not limited to, fuels and lubricants, paints, solvents, insulation, electrical wiring, and other construction related materials onsite. Although potentially hazardous materials may be present onsite during construction, the Project is required to comply with all existing federal, state, and local safety regulations governing the transportation, use, handling, storage, and disposal of potentially hazardous materials.

Additionally, applicable regulations include the preparation of a Storm Water Pollution Prevention

Plan (SWPPP) approved by the Regional Water Quality Control Board prior to construction. The SWPPP specifically addresses the potential for accidental release of hazardous and non-hazardous waste and spills during construction. **COA HYD-1** requires that the applicant receive approval of the SWPPP prior to issuance of a grading permit. Additionally, Public Works/Engineering Project Conditions of Approval include requirements that the Notice of Intent be submitted to the North Coast Regional Water Quality Control Board for a General Construction Activity Stormwater Permit.

Further, Public Works/Engineering requires that the project comply with the standard condition that if hazardous waste or contamination is encountered during the construction of the project, all work shall be stopped immediately and the Sonoma County Environmental Health Department, the Fire District the Police Department, and the City Inspector be notified. Work shall not proceed until clearance has been issued by all these agencies. Compliance with **COA HYD-1** and the Public Works and Engineering standard conditions of approval ensures that the project is consistent with General Plan polies related to hazardous materials.

Accordingly, potential impacts of hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials from the proposed Project would not exceed those analyzed in the 2013 General Plan EIR. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to routine transport, use, disposal, or release of hazardous materials relative to the 2013 General Plan EIR.

5.9(c) (Emit Hazardous Materials within ¼ Mile of a School Site) – No Substantial Change Relative to the General Plan EIR

The 2013 General Plan EIR concluded that the implementation of the General Plan would result in a less than significant impact due to the release and exposure of hazardous material onto school sites.

The nearest school to the Project site, Thomas Page Academy, is located approximately 0.25 miles southwest. However, there are no activities associated with the proposed Project that would pose a threat to nearby schools from the release or handling of hazardous materials. Additionally, the project is required to comply with **COA AQ-1** and **COA AQ-2** which require implementation of measures to reduce PM_2 and PM_{10} emissions. As conditioned and through the implementation of applicable state and local regulations, the Project will not result in accidental exposure related to the handling of hazardous materials or result in any increased risk of exposure to existing schools. Therefore, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.9(d) (Existing Hazardous Materials Sites) – No Change Relative to the General Plan EIR

Historically, the site contained a residence and agricultural buildings from sometime between 1953 and 1965 until the late 1970s-early 1980s when the structures were demolished. The remainder of the two lots at this time was utilized as agricultural land. In 2003, the land was used as a staging area for building materials and vehicles during the construction of residences on the adjoining property to the north. By 2005, the northern lot (046-28-021) was a park for the adjoining residences. A review of federal, state, and local records did not identify any records of hazardous materials on the site and no evidence of recognized environmental conditions in connection with the property.

The nearest voluntary cleanup site under EnviroStor is the Cotati Rod and Gun Club, located approximately one mile west of the Project site. The Project site is not identified as a Leaking

Underground Storage Tank (LUST) Cleanup Site or Cleanup Program Site under Geotracker. Two sites with records of prior hazardous materials cleanup in Geotracker have been identified in the vicinity, both on SR-116 west of the Alder Avenue intersection. However, cleanup has been completed and the cases have been closed: the LUST cleanup listed at 8155 Gravenstein Highway for H-G Equipment, Inc (T0609700032) was closed in 1998 and the Cleanup Program Site for Minatta Transportation Co.(T0609793444) was closed in 1999.

Therefore, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.9(e) (Public Airport Land Use Plans) – No Change Relative to the General Plan EIR

The City of Cotati is not located within an airport land use plan, two miles of a public airport or public use airport, or within the vicinity of a private airstrip, and the General Plan concluded that impacts would not result in a safety hazard for people residing or working in the city. The subject Project site is within the City of Cotati and is not within or in proximity to a Public Airport Land Use Plan. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.9(f-g) (Emergency Response and Wildland Fire) – No Change Relative to the General Plan EIR

The Project is within the projected development under the General Plan and would not interfere with emergency response and evacuation plans. The Rancho Adobe Fire District (RAFD) reviewed the proposed site plan and provided a Memorandum with conditions of approval on February 14, 2024. The conditions ensure the uniformly applied standards of the California Fire Code are applied to the project. Through implementation of the conditions of approval set by the RAFD, the Project will not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. The Project will undergo final review and permitting by the RAFD to confirm compliance with uniformly applied standards prior to issuance of a building permit and a certificate of occupancy.

The Project site is located outside of local and State fire hazard severity zones and through the application of uniformly applied standards would not expose people or structures to significant wildfire risks or interfere with emergency response. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CSF 3.7: Continue to coordinate with Sonoma County to require all businesses and residents to comply with the local and State requirements regarding the proper disposal of toxic and hazardous materials and waste.

Status: Construction of the Project may involve use and handling of routine and household hazardous materials. However, the project must comply with all local, State, and federal regulatory standards applicable to management of hazardous materials associated with construction activities and must obtain any necessary approvals from Sonoma County for proper disposal of hazardous materials and waste. As conditioned and through the application of uniformly applied development standards, the Project complies with Policy CSF 3.7.

Conclusion

The Project is within the scope of development projected under the General Plan and will not result in any substantial new or more severe impacts related to hazards and hazardous materials relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. **COA AQ-1, COA AQ-2**, and **COA HYD-1** implement the 2013 General Plan EIR mitigating policies and actions.

5.10. HYDROLOGY AND WATER QUALITY

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern on the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control	☐	☐	☒	☐

plan or sustainable groundwater management plan?	

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin prepared by Sonoma Water and approved on January 26, 2023; Public Works/Engineering Conditions of Approval prepared February 29, 2024; and Preliminary Hydrology and Hydraulics Report for Cotati Village 2 prepared by Civil Design Consultants in February, 2024; and Preliminary Civil Plans prepared by Civil Design Consultants, Inc., dated February 2024.

2013 General Plan EIR Findings

The 2013 General Plan EIR evaluated the potential impacts related to hydrology and water quality in Chapter 3.8 and determined the following.

- Impact 3.8.1 – Implementation of the General Plan could result in a violation of water quality standards or waste discharge requirements. Through the implementation of the mitigating Policies CON 1.8 – CON 1.14 and Actions CON 1f – CON 1k, and the requirements of the NPDES Phase 1 MS4 permit and the LID Manual requirements, implementation of the General Plan would have a less than significant impact.

- Impact 3.8.2 – Implementation of the General Plan could contribute to the depletion of groundwater supplies or interfere substantially with groundwater recharge. Through the implementation of the mitigating General Plan Policies CSF 2.1- CSF 2.15 and Actions CSF 2a - CSF 2g , combined with the City continuing to obtain surface water from the Russian River and reducing the consumption of groundwater, implementation of the General Plan would have a less than significant impact.

- Impact 3.8.3 – Implementation of the General Plan could alter the existing drainage pattern in a manner which would result in substantial erosion, siltation, flooding, or polluted runoff. Through the implementation of the mitigating General Plan Policies CON 1.1 , CON 1.2, CON 1.7 – CON 1.14, SA 3.1 – 3.13, Actions CON 1f – CON 1k, SA 3a – 3h, and compliance with state and local regulations, implementation of the General Plan would have a less than significant impact.

- Impact 3.8.4 – Implementation of the General Plan could otherwise substantially degrade water quality. Through the implementation of the mitigating General Plan Policies CON 1.8 – CON 1.14, Actions CON 1f – CON 1k, and compliance with state and local regulations, implementation of the General Plan would have a less than significant impact.

- Impact 3.8.5 – General Plan implementation could place housing and structures within a 100--year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Through the implementation of the mitigating General Plan Policies SA 3.1 – SA 3.13, Actions SA 3a – 3h, and compliance with state and local regulations, implementation of the General Plan would have a less than significant impact.

- Impact 3.8.6 – Implementation of the General Plan Update would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of failure

of a levee or dam, seiche, tsunami, or mudflow. There are no levees or dams upriver from the City of Cotati and it is not located within the vicinity of a body of water that could be subject to a seiche or tsunami. The relatively level slopes and soil types throughout the City of Cotati result in a very low potential for mudflow. Therefore, implementation of the General Plan would result in a less than significant impact.

The 2013 General Plan EIR found that with the implementation of mitigating General plan Policies CON 1.1, CON 1.2, CON 1.7 – CON 1.14, CSF 2.1-2.15, SA 3.1- SA 3.13 and Actions CON 1f-1k, CSF 2a-2g, SA 3a-3h as well as through the application of applicable state and local regulation, impacts to hydrology and water quality were less than significant.

Stormwater Regulation

The State Water Resources Control Board (SWRCB) is responsible for implementing the Clean Water Act (CWA) and has issued a statewide General Permit for construction, which acts to minimize pollutant runoff to surface waters and groundwater. The City of Cotati is mostly located within the North Coast Hydrologic Region, which manages the Russian River watershed, and a portion of the southern part of the city drains to San Pablo Bay by the Petaluma River and is managed as a part of the San Francisco Bay Hydrologic Region. Within the city, there are two hydrologic subareas, the Upper Laguna de Santa Rosa Subarea (Russian River) and the Petaluma River Subarea (San Pablo). Cotati has joined with other permittees in the Santa Rosa Plain under a Phase 1 National Pollution Discharge Elimination System (NPDES permit (Water Quality Order No. R1-2015-0030) (NPDES No. CA0025054) which imposes requirements on municipalities to mitigate for stormwater quality and quantity and provides the Santa Rosa Storm Water Low Impact Development Technical Design Manual (LID Manual) as guidance.

Project Consistency with the 2013 General Plan EIR

A preliminary Hydrology and Hydraulics Report was prepared by Civil Design Consultants (February 2024) that evaluated existing hydrology of the site and the storm drain capacity and is relied upon to inform this analysis.

5.10(a) (Discharge) – No Substantial Change Relative to the General Plan EIR

Construction

The Project's construction activities and the installation of new impervious areas have the potential to result in increased runoff that could contain sediment and other pollutants that could degrade water quality if not properly controlled. Potential pollutants commonly associated with construction include fuel, grease, oil, concrete material, sediment, and litter. These pollutants have the potential to degrade water quality if not properly managed. However, as concluded in the 2013 General Plan EIR, the NPDES requirements, including the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) and compliance with the RWQCB Order No. R1-2015-0030, Waste Discharge Requirements minimize the impacts from future development. The purpose of the SWPPP is to identify potential sediment sources and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination impacts would not occur during construction activities. Public Works has imposed a Condition of Approval that requires that the SWPPP be approved by the North Coast Regional Water Quality Control Board (NCRWQCB). Further, the Project is required to conform to Chapter 14.36 of the Municipal Code, which contains grading and erosion control

requirements. In compliance with the 2013 General Plan Policy CON 1.12, Policy SA 3.3, and Policy SA 3.13, **COA HYD-1** requires that the applicant secure an SWPPP approved by the NCRWQCB and submit to the City's Engineer prior to issuance of a grading permit. With condition of approval, implementing the Policies of the General Plan and in conformance with RWQCB Order No. R1-2015-0030, the Project's potential to result in impacts due to contaminated discharges during construction will be less than significant.

Operation

The proposed Project is required to conform to Chapter 13.68 of the Cotati Municipal Code, which regulates storm water discharge. A preliminary Stormwater Control Plan was prepared for the Project that demonstrates that Low Impact Design Strategies can feasibly pre-treat stormwater prior to entry into the municipal storm drain. A preliminary Hydrology and Hydraulics Report was prepared by Civil Design Consultants (February 2024) that evaluated existing hydrology of the site and the storm drain capacity of the 36-inch storm drain in Alder Avenue. The report concluded that sufficient capacity exists to accommodate Project flows without expansion of municipal storm utilities.

Public Works provided Conditions of Approval that require that Project stormwater capture and discharge design meet the most recent edition of City of Cotati, Phase I MS4 permit and the City of Santa Rosa Low Impact Development (LID) Technical Design Manual, and that prior to approval of the improvement plans, the applicant shall submit a Final Storm Water Low Impact Development Plan (FSWLID), subject to review and acceptance by the City Engineer. The applicant prepared a preliminary Stormwater Low Impact Development Submittal, and to ensure compliance with this requirement, **COA HYD-2** is imposed, and requires that the FSWLID include post-construction storm water treatment and peak reduction measures and address maintenance of private and/or public storm water facilities.

As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to stormwater discharge relative to the 2013 General Plan EIR.

5.10(b) (Groundwater) – No Substantial Change Relative to the General Plan EIR

Buildout of the Cotati General Plan will result in the introduction of new impervious surfaces that could potentially reduce rainwater infiltration and groundwater recharge. However, the General Plan EIR determined that impacts would be minimal in urban areas since the net change in impervious surfaces would be negligible. The 2013 General Plan EIR further determined that development anticipated under the General Plan would result in less than significant impact due to the depletion of ground water supplies or interference with groundwater recharge. The City has established maximum groundwater extraction volume policies that reduce the drawdown of groundwater and is not expanding use of groundwater supplies.

The State of California adopted the Sustainable Groundwater Management Act (SGMA) in 2014 which called for the creation of local Groundwater Sustainability Agencies (GSA) to develop and implement Groundwater Sustainability Plans for the long-term management of groundwater resources. The Santa Rosa Plain GSA was formed through a joint powers authority (JPA) between the cities of Cotati, Rohnert Park, Santa Rosa, and Sebastopol, Town of Windsor, County of Sonoma, Sonoma Water, Gold Ridge Resource Conservation District, and Sonoma Resource Conservation District (Sonoma RCD) and

has a participation agreement with mutual water companies and CPUC-regulated water corporations that allows for participation in the GSA.

The Groundwater Sustainability Plan (GSP) for the Santa Rosa Plain Subbasin was approved by the California Department of Water Resources (DWR) on January 26, 2023. It establishes a standard for sustainability of groundwater management and use and determines how the basin will achieve this standard by 2042.

The Project proposes to rely exclusively on municipal water supplies and does not propose the extraction or use of groundwater. Furthermore, to ensure the Project complies with guidance from the Bay Area Stormwater Management Agencies Association (BASMAA) Post-Construction Manual, including low impact development strategies and best management practices in site design to mimic pre-project site hydrology, **COA HYD-2** has been imposed. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.10(c i-iv) (Drainage Pattern) – No Substantial Change Relative to the General Plan EIR

The 2013 General Plan EIR determined that impacts due to increases in impervious surfaces and alteration of drainage conditions, as they relate to erosion, runoff, and drainage flow would be less than significant with General Plan policies and mitigation. Implementation of General Plan policies, Municipal Code regulations, and applicable provisions of the City's MS4 permit were identified as measures that would reduce impacts to less than significant levels.

Through the implementation of **COA HYD-1**, the Project will comply with these requirements during construction. The site design is also required to implement best practices for low impact development to mimic pre-project site hydrology through **COA HYD-2.** Further, the Public Works/Engineering conditions require City Engineer approval of stormwater management, on-site drain facilities, grading, and any drainage improvements.

The City is served by an existing storm drain system, and the City's Engineer has confirmed the infrastructure capacity for the Project. As new developments have the potential to incrementally increase the use of storm drains, the City has established development impact fees levied on new developments to contribute to any needs for new or expanded infrastructure. Payment of development impact fees, as well as review of final drainage plans for compliance with uniformly applied standards, is a requirement in the building permit process. Development impacts fees are used to maintain and build out the city's storm drain system as planned.

The Project includes a preliminary plan for onsite infiltration and connection to the storm drain system. To ensure compliance with the 2013 General Plan EIR Policies CON 1.12, CON 1.13, SA 3.2, and SA 3.12, **COA HYD-2** requires the Project plans to include onsite storm drain infrastructure with connections to the existing storm drain system and shall pay any required development impact fees. As conditioned, and through the application of uniformly applied standards, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.10(d) (Pollutants in Flood Hazard, Tsunami, or Seiche Zones) – No Change Relative to the General Plan EIR

The City of Cotati is subject to flooding of the Laguna de Santa Rosa and Cotati creeks and implementation of the General Plan could result in the flooding of development in these areas. As shown in Figure 3.8-1: Watersheds of the 2013 General Plan EIR, the Project site is not located near any streams or rivers that could be directly impacted by the proposed Project. As shown in Figure 3.8-2: Flood Hazard Map of the 2013 General Plan EIR, the Project site is located outside of the regulated 100-year flood plain and within the 500-year floodplain, which is considered a low to moderate flood hazard area, but it is not within any tsunami or seiche hazard zones. Therefore, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.10(e) (Conflict with Water Quality Control Plan or Sustainable Groundwater Management Plan) – No Change Relative to the General Plan EIR

The 2013 General Plan EIR determined that new development would be required to adhere to pertinent local, state, and federal agency requirements, and that with implementation of Policy SA 3.2 and compliance with water quality regulation including NPDES requirements, potential impacts to water quality would be reduced to less than significant levels.

COA HYD-1 and **COA HYD-2** require implementation of pertinent local, state, and federal agency requirements, including the Cotati Municipal Code, and ensures the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CON 1.12: Require discretionary projects, as well as new flood control and stormwater conveyance projects, to integrate best management practices (BMPs) and natural features to the greatest extent feasible, while ensuring that these features adequately convey and control stormwater to protect human health, safety, and welfare.

Status: The Project is subject to the regulations of the Regional Water Quality Control Board and as a project that is larger than one acre is required to prepare a Storm Water Pollution Prevention Plan (SWPPP), comply with the RWQCB Order No. R1-2009-0045 Waste Discharge Requirements, implement BMPs, and comply with the City's Municipal Code Chapter 13.68 which regulates storm water discharge, as well as Chapter 14.36, which regulates erosion and sediment control. A preliminary erosion control plan has been prepared and Public Works Engineering Conditions require a SWPPP approved by the RWQCB. Further, **COA HYD-1** requires submittal of a final SWPPP and acceptance by the City Engineer to ensure compliance with applicable regulations and incorporation of required construction practices into the project. A preliminary storm water control plan (SCP) has been prepared that demonstrates that the Project can accommodate stormwater flows from impervious surface in bioretention planters distributed throughout the site. The planters would provide treatment and removal of pollutants prior to collection in underground volume capture, infiltrate stormwater, and discharge excess flows to the municipal storm drain in Alder Avenue. **COA HYD-2** requires submittal of a final SCP plan and acceptance by the City Engineer to ensure compliance with the City's Municipal Code and the City's MS4 permit during Project operation. As conditioned, the Project is consistent with this policy.

Policy CON 1.13: Prioritize the use of natural features such as bioswales, vegetation, retention ponds, and other measures to remove surface water pollutants prior to discharge into surface waters.

Status: The Project is designed to include a series of bioretention areas that will receive gutter and impervious surface runoff, and which are designed to remove surface water pollutants prior to entering into storm drains. **COA HYD-2** requires submittal of a final SCP and acceptance by the City Engineer to ensure compliance with the City's Municipal Code and the City's MS4 permit during Project operation. As conditioned, the Project is consistent with this policy.

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 and companion documents, which collectively define the design storm event for water detention and retention features.

Status: The project will treat stormwater through the use of bioretention areas dispersed throughout the development that receive stormwater from gutters and runoff off of impervious surfaces. Overflow from bioretention areas will be conveyed to the existing municipal storm drain in Alder Avenue. As conditioned by **COA HYD-2**, a Storm Water Low Impact Development Plan (FSWLID) and Stormwater Mitigation Plan shall be submitted for review and approval by the City Engineer. **COA HYD-2** also requires the City Engineer to review final construction plans to ensure appropriate application of best management practices for low impact development. As conditioned, the Project complies with this policy.

Policy SA 3.3: Ensure that construction activities will not result in adverse impacts to existing flood control and drainage structures.

Policy SA 3.13: Ensure that adequate drainage and erosion controls are provided during construction of all new developments.

Status: Best management practices for soil erosion and sediment control are required to be applied during construction by **COA HYD-1**. Additionally, the Project is subject to Municipal Code Chapter 14.36, Erosion and Sediment Control Plan, which requires preparation and implementation of a final erosion and sediment control plan. Compliance with this condition and the uniformly applied development standards ensures that potential adverse effects of erosion during construction activities are avoided. **COA HYD-1** requires that the applicant submit final plans to the City Engineer for approval prior to issuance of the grading permit. As conditioned, the Project complies with this policy.

Policy SA 3.12: Require all new developments in the city to be designed to minimize vegetation removal, soil compaction, and site coverage.

Status: The site is dominated by ruderal vegetation and contains 41 trees. The Tree Inventory (**Appendix C**) details that it is possible to preserve 36 trees on the project site as well as existing street trees located along Alder Avenue. Soil treatments during grading must be conducted in accordance with the recommendations of the Project geotechnical investigation, as required by **COA GEO-1**, and

will be confirmed by the City during site inspections. As conditioned by **COA HYD-2**, the Project would be required to implement low impact development strategies per the Santa Rosa Storm Water Low Impact Development Technical Design Manual. As conditioned, the project complies with this policy.

Action SA 3g: As part of the development review process, require developers to prepare hydrological studies for all new developments as required by the City Engineer. Studies shall encompass the project site as well as the entire drainage area.

Status: A hydrology study, dated February 2024, was prepared by Civil Design Consultants for the project, encompassing the Project site and drainage area as required by SA 3g. The hydrology study evaluated the capacity and condition of the municipal storm drain in Alder Avenue and concluded that there is sufficient capacity to accommodate the Project. The City Engineer has conducted an initial review of the proposed plans and provided a memo that includes conditions of approval. As such, the project complies with this policy.

Conclusion and Environmental Conditions of Approval

The Project is within the scope of development projected under the General Plan and as conditioned and through the application of uniform standards, complies with the mitigating policies and actions in the 2013 General Plan EIR. As conditioned the Project would not result in any substantial new or more severe impacts to hydrology and water quality relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental conditions of approval are required to implement the 2013 General Plan EIR mitigating policies:

COA HYD-1: Prior to issuance of a building permit, the applicant shall submit a Storm Water Prevention and Pollution Plan (SWPPP) and erosion and sediment control plan for approval by the City Engineer. The SWPPP shall include Best Management Practices to be implemented during grading and construction activities. The SWPPP shall incorporate the requirements of all applicable federal, state, and local regulations. Submitted plans shall also demonstrate compliance with City of Cotati Municipal Code Chapter 13.68 Storm Water Ordinance and Chapter 14.36 Erosion and Sediment Control.

COA HYD-2: Prior to issuance of a grading permit, the applicant shall submit a final Stormwater Control Plans (SCP) including a final Storm Water Low Impact Development Plan (FSWLID) and Stormwater Mitigation Plan for review and approval by the City Engineer.

5.11. LAND USE AND PLANNING

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015.

2013 General Plan EIR Findings

The 2013 General Plan EIR evaluated potential impacts to Land Use in Chapter 3.9 and determined the following:

- Impact 3.9-1: General Plan implementation has the potential to physically divide an established community. The proposed General Plan does not include any new areas designated for urbanization or new roadways, infrastructure, or other features that would divide existing communities and would result in a less than significant impact.

- Impact 3.9-2: General Plan implementation has the potential to conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted to avoid or mitigate an environmental effect. Implementation of the General Plan could result in potential adverse environmental impacts, including traffic, noise, water quality, biological resources, drainage and water quality, air quality, hazards, geology/soils, and cultural resources. Through compliance with local, state, and federal regulations as well as the mitigating policies and actions evaluated in the 2013 General Plan EIR, implementation of the General Plan would have a less than significant impact.

Project Consistency with the 2013 General Plan EIR

5.11(a) (Physically Divide Community) – No Change Relative to the General Plan EIR

The Project proposes development on a privately-owned, underdeveloped parcel. The site is surrounded by existing roads on the south and east, the existing Cotati Cottages residential development to the east, as well as a currently vacant parcel to the east (recently approved for mixed use development Cotati Villages 1), and commercial to the west. The Project would introduce new residences and access in a manner anticipated by the General Plan and consistent with the site's zoning. As such, the Project would not physically divide a community. Additionally, the project will

introduce a multi-use path along the frontage to SR-116, a sidewalk along Alder Avenue, and new internal pathways that will provide connections to existing, planned, and proposed facilities. Therefore, the Project would not substantially increase the severity of the less than significant impacts nor would it result in new significant impacts related to physical division of an established community that were not identified in the 2013 General Plan EIR.

5.11(b) (Conflict with Land Use) – No Substantial Change Relative to the General Plan EIR

The Project is consistent with the General Plan land use designation and allowable density and FAR for the site, as provided by the State Density Bonus law. Through the environmental review process and design review process, the Project is found to be consistent with the General Plan policies and zoning code standards applicable to the proposed development and as provided by the State Density Bonus law. Implementation of the Project would be subject to compliance with conditions of approval imposed on the Project as a standard part of the entitlements process to ensure compliance and implementation of General Plan policies, regulations, and development standards, from the subsequent permitting and construction process. Therefore, as conditioned the Project would not substantially increase the severity of the less than significant impacts nor would it result in new significant impacts that were not identified in the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

The 2013 General Plan EIR did not identify any mitigating policies for Land Use, however the EIR notes that the General Plan could result in potential adverse environmental impacts, including to traffic, noise, water quality, biological resources, drainage and water quality, air quality, hazards, geology/soils, and cultural resources. The EIR notes that the Impacts to these resources, including consistency with applicable plans, policies, and regulations, are evaluated in the appropriate sections of the 2013 General Plan EIR.

The Project is conditioned to ensure compliance and consistency with relevant mitigating policies and actions identified in the 2013 General Plan EIR in the relevant sections of this document and as conditioned, is consistent with the mitigating policies and actions in the 2013 General Plan EIR.

Conclusion

The Project is within the scope of development projected under the General Plan. As conditioned through the review process, the Project is consistent with the General Plan and complies with the City's zoning code and would not physically divide a community. As conditioned, the Project would not substantially increase the severity of the less than significant impacts nor would it result in new significant impacts that were not identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The Project Conditions of Approval are required to implement the 2013 General Plan EIR mitigating policies and actions.

5.12. MINERAL RESOURCES

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015. Mines Online by California Department of Conservation Division of Mine Reclamation viewed on May 13, 2024.

2013 General Plan EIR Findings

The California Department of Conservation Surface Mining and Reclamation Act of 1975 (§ 2710), also known as SMARA, provides a comprehensive surface mining and reclamation policy that permits the continued mining of minerals, as well as the protection and subsequent beneficial use of the mined and reclaimed land. The 2013 EIR did not identify any known significant mineral resources of value to the region and residents of the state within the city.

Project Consistency with the 2013 General Plan EIR

5.12(a-b) (Mineral Resources) – No Change Relative to the General Plan EIR

The site does not contain known significant mineral resources of value.[3] As such, the Project will not impact mineral resources and the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

There are no applicable General Plan EIR mitigation measures to this Project.

Conclusion

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to land use and planning relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and

[3] California Department of Conservation, Division of Mne Reclamation. Mines Online. https://maps.conservation.ca.gov/mol/index.html Accessed: May 13, 2024.

there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. No Conditions of Approval are required beyond compliance with uniformly applied development standards and applicable local and state regulations.

5.13. NOISE

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Cotati Village Community Two Noise and Vibration Analysis prepared by Illingworth and Rodkin on June 7, 2024; and City of Cotati Municipal Code; and Public Works/Engineering Conditions of Approval prepared in February 29, 2024.

2013 General Plan EIR Findings

The City of Cotati 2013 General Plan EIR identifies the City's existing noise and vibration sources and levels, standards of measurement and thresholds, and potential impacts resulting from implementation of the General Plan. The 2013 General Plan EIR concludes that, with implementation of General Plan policies, impacts to ambient noise levels in the City due to traffic noise sources as well as cumulative stationary noise sources and increased traffic noise would be significant and unavoidable.

The 2013 General Plan EIR evaluated potential impacts to Noise in Chapter 3.10 and determined the following:

- Impact 3.10-1: General Plan implementation has the potential to increase ambient noise levels due to traffic noise sources. While implementation of the Policies N 1.1 – N 1.3, N1.6 – N 1.14 and Actions N 1a – N 1g of the General Plan will reduce noise and land use compatibility impacts from vehicular traffic noise sources and would ensure that new development is

designed to include noise-attenuating features, some traffic noise impacts cannot be mitigated to a less-than-significant level due the proximity of sensitive receivers to major roadways, and because noise attenuation may not be feasible in all circumstances. Therefore, implementation of the General Plan could potentially result in a significant increase in ambient noise levels and would result in a significant and unavoidable impact.

- Impact 3.10-2: General Plan implementation has the potential increase ambient noise levels due to railroad noise sources. This is considered a less than significant impact. Through the implementation of the mitigating General Plan Policies N 1.1 – N 1.3, N 1.8, N 1.11, and Actions N 1a – N 1c, and 1g, implementation of the General Plan would have a less than significant impact.

- Impact 3.10-3: General Plan implementation has the potential increase ambient noise levels due to stationary noise sources. Through the implementation of the mitigating General Plan Policies N 1.1, N 1.2, N 1.3, N 1.4, N 1.5, N 1.7, N 1.8, N 1.9, N 1.11, N 1.13, and Actions N 1a – N 1c, and 1g, implementation of the General Plan would have a less than significant impact.

- Impact 3.10-4: General Plan implementation has the potential increase ambient noise levels due to construction noise sources. Through the implementation of the mitigating General Plan Policies N 1.5, N 1.12, and Actions N 1c, N 1d, N 1e, and N 1h, implementation of the General Plan would have a less than significant impact.

- Impact 3.10-5: General Plan implementation has the potential to cause increased perceptible groundborne vibration levels during construction. Through the implementation of the mitigating General Plan Policies N 1.5, N 1.12, N 1.15, and Actions N 1c and N 1h, implementation of the General Plan would have a less than significant impact.

- Impact 3.10-7: Under cumulative conditions, the General Plan would accommodate development that would result in increased traffic noise and an increase in stationary noise sources. The General Plan includes mitigating Policies N 1.1- N 1.14, and Actions N 1a – N1h that are intended to reduce noise associated with both stationary sources and traffic. While these policies will reduce noise impacts, some traffic noise impacts cannot be mitigated to a less-than-significant level due the proximity of sensitive receivers to major roadways, and because noise attenuation may not be feasible in all circumstances. As a result, this is a significant and unavoidable cumulative impact.

- The City of Cotati adopted the Findings of Fact and Statement of Overriding Considerations on March 24, 2015, including for the significant and unavoidable impacts identified for Noise (Impact 3.10-1 and 3.10-7). The City findings determined that subsequent development under the General Plan would result in an increase in noise. While consistency with policies and actions would help reduce exposure of sensitive receptors to noise levels, it may not be feasible to mitigate the impact to less than significant levels in all instances, particularly where existing development is located near proposed development. Additionally, some traffic noise impacts cannot be mitigated to less than significant levels due to proximity of sensitive receptors to

major roadways and noise attenuation may not be feasible in all circumstances. The City findings determined that despite the significant and unavoidable impact to noise, no other project alternative would meet the City's objective to realize the development potential of undeveloped lands for residential, office, and commercial uses necessary for housing opportunity and job growth.

Project Consistency with the 2013 General Plan EIR

5.13(a) (Increase in Ambient Noise) – No Substantial Change Relative to the General Plan FEIR

The existing noise environment at the site consists primarily of noise from vehicular traffic on SR-116, with distant noise from Highway 101 contributing to background sound levels. Other sources of noise include commercial, agricultural, and residential noise in the vicinity. The General Plan provides that "specified land use may be permitted only after detailed analysis of noise reduction requirements is made and needed noise insulation features are included in the design." The City of Cotati Municipal Code Section 17.30.050 further states that the maximum allowable noise levels for residential outdoor and interior spaces are 65 dBA L_{dn} and 45 dBA L_{dn}, respectively.

A Noise and Vibration Assessment was prepared for the proposed Project by Illingworth and Rodkin on June 7, 2024 (**Appendix F**). A noise survey included three short-term measurement locations, shown as ST-1, ST-2, and ST-3, two of these measurements (ST-1 and ST-2) were made in the vicinity of proposed buildings A and B at approximately 235 feet and 400 feet from the centerline of SR-116. A third location (ST-3), which was conducted at the position of the long-term measurement closest to SR-116 east of the site at the Cotati Village #1 location. LT-1 was made on the trunk of a tree at a height of 12 feet above grade and approximately 100 feet from the centerline of SR-116. Average daytime noise levels ranged from 62 to 68 dBA Leq, the average hourly nighttime noise levels ranged from 53 to 66 dBA L_{eq}, and overall average Day/Night noise Level (L_{dn}) is 68-69 dBA.

Based on existing noise levels and the distances from the facades of proposed Building A and B with views of SR-116 traffic, it is anticipated that the traffic noise exposure at Building A would range from 56 to 62 dBA L_{dn} and the traffic noise exposure at Building B would range from 60 to 61dBA L_{dn} under existing conditions.

The future noise environment, like the existing environment, would primary be due to roadway traffic. The noise assessment estimates the increase in traffic volume along SR-116, not related to the project will result in a projected increase in noise conditions by 3 dBA resulting in a range of 59-65 dBA L_{dn} for areas of Building A with views of SR-116 and a range of 63 to 64 L_{dn} for areas of Building B with views of SR-116.

As detailed in the Noise and Vibration Assessment, and established by General Plan Policy N1.7, a substantial permanent noise increase would occur if the noise level increase resulting from the Project is 1.5 dBA where existing traffic noise levels are greater than 65 dBA L_{dn}, 3 dBA L_{dn} where existing traffic noise levels are between 60 and 65 dBA Ldn, and 5 dBA L_{dn} where existing traffic noise levels are less than 60 dBA L_{dn} as established by the Cotati General Plan.

The Project proposes a central common open space area, approximately 275 feet from the centerline of SR-116 and will receive partial acoustical shielding from intervening structures. Without partial shielding, sound levels in the common space area are expected to be up to 65

dBA L_{dn}. This exterior noise level is considered to be "normally acceptable" for multifamily residential land uses, and no further noise reduction measures are required.

For interior noise level in new residential buildings, the interior noise levels from normal construction are typically 20-25 dBA below exterior noise levels with windows closed, or 15 dBA below when windows are partially open. For building frontages facing the SR-116 frontage, final project design would need to incorporate features to reduce the 65 dBA L_{dn} noise level to an interior standard of 45 dBA L_{dn}. To ensure interior noise standards are met, **COA NOI-1** has been imposed and requires the installation of mechanical ventilation systems to supply fresh air to all apartments in Buildings A and B that are within 400 feet of the centerline of SR-116. As conditioned, construction of the project would not substantially increase noise levels and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact

Operational Noise Generation

The proposed project would place new residential uses within 175 feet of the future Cotati Village #1 residential development to the east and within 200 feet of an existing multi-family housing development to the northeast. The occupation and use of the proposed homes is expected to result in the typical noises associated with residential development, including voices of the new residents, home maintenance activities, barking dogs and children. The Heating Ventilation and Air Conditioning (HVAC) and other mechanical equipment associated with multifamily residential development may also add noise to the existing environment. As described in the Noise and Vibration Assessment, the outdoor condensing units at the proposed residences may produce constant sound levels of 47 to 50 dBA L_{eq} at 50 feet and could operate continuously during both daytime and nighttime hours. Considering these noise levels and distances to the adjacent residential uses, noise from the project HVAC equipment would be at or below ambient noise levels at these adjacent residences. Additionally, though noise resulting from occupation of the new residences may noticeably change the noise environment in some adjacent residential areas, these sources are not expected to increase noise levels in any surrounding areas by four or more dBA and the noise associated with the proposed residences is not incompatible with the surrounding land uses. Therefore, the operation of the project would not substantially increase noise levels and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact.

Project Generated Traffic Noise

A substantial increase would occur if the project traffic on area roadways were to result in a noise level increase of 5 dBA L_{dn} or greater at multi-family homes east of the project site, or by 1.5 dBA L_{dn} or greater at the single-family homes south of the project site on the opposite side of SR-116. The traffic analysis for the Cotati Village #2 development indicates that it would generate 68 trips during the a.m. peak hour and 69 during the p.m. peak hour, and the Traffic Impact Analysis for the Cotati Village #1 indicates that it would generate 110 trips during the a.m. peak hour and 178 during the p.m. peak hour for a total trip generation between the Village #1 and Village #2 projects of 178 trips during the a.m. peak hour and 247 trips during the p.m. peak hour. The analysis from Cotati Village #1 traffic report also indicated that there are currently 1,348 am peak hour trips and 1,251 pm peak hour trips on SR-116 adjacent to the site.

Considering traffic volumes from the recently approved Cotati Village #1 and the subject proposed project, Cotati Village #2, traffic would result in a less than 1 dBA increase in noise levels on SR-116. Further, under the proposed project, traffic on Alder Avenue would result in a 3 dBA or less increase in noise levels. As such the project would not substantially increase traffic noise.

As conditioned, the Project will not result in a substantial increase in noise and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to noise relative to the 2013 General Plan EIR.

5.13(b) (Groundborne Vibration) – No Substantial Change Relative to the General Plan EIR

The City of Cotati 2013 General Plan EIR determined that construction activities from buildout of the General Plan could result in periods of significant ambient noise levels and groundborne vibration. As outlined below, General Plan action items relevant to the proposed Project include Actions N 1c and N 1h. Action N 1c requires an acoustical study for all new discretionary projects and Action N 1h contains suggested "best practices" for control of construction noise. In compliance with these action items identified in the 2013 General Plan EIR, a Noise and Vibration Analysis was prepared for the Project (**Appendix F**).

Construction activities would include site preparation work such as grading and the installation of utilities, foundation work, and new building framing and may generate groundborne vibrations. Construction techniques that generate the highest vibration levels, such as impact or vibratory pile driving, are not expected.

Construction activities would generally occur at distances of 200 feet or more from the nearest residential units to the northeast. A standard vibration limit of 0.5 in/sec, PPV, used by the California Department of Transportation, is applied to consider structural damage for buildings designed to modern engineering standards; 0.2 in/sec, PPV is used for buildings found to be structurally sound but where structural damage is a major concern. As shown in **Table 5.1**, vibration source levels for typical construction equipment would not exceed these vibration limits at distances of 200 feet. As such, construction vibration levels would be well below limits at the closest residential structures.

Table 5.8: Vibration Source Levels for Construction Equipment

Source	PPV at 25 ft. (in/sec)	PPV at 200 ft. (in/sec)
Clam shovel drop	0.202	0.009
Hydromill (slurry wall) in soil	0.004	0.0004
Hydromill (slurry wall) in rock	0.008	0.001
Vibratory Roller	0.210	0.009
Hoe Ram	0.089	0.004
Large bulldozer	0.089	0.004
Caisson drilling	0.089	0.004
Loaded trucks	0.076	0.003
Jackhammer	0.035	0.002
Small bulldozer	0.003	0.0001
Source: Noise and Vibration Assessment, prepared by Illingworth and Rodkin, Inc, June 7, 2024.		

Construction would result in a temporary increase in noise levels at adjacent residential receivers. Construction activities are typically carried out in stages with variations in noise levels by stage and within stages as different mixes of equipment are used. Typical noise levels at 50 feet were calculated during construction of housing to range from approximately 65 to 88 dBA, as shown in **Table 5.9**.

Table 5.9: Typical Ranges of L_{eq} Construction Noise Levels at 50 Feet, dBA

Construction Stage	Domestic Housing		Public Works Roads & Highways, Sewers, and Trenches	
	I	II	I	II
Ground Clearing	83	83	84	84
Evacuation	88	75	88	78
Foundations	81	81	88	88
Erection	81	65	79	78
Finishing	88	72	84	84
Notes: **I** – All pertinent equipment present at site, **II** – Minimum required equipment present at site.				
Source: Noise and Vibration Assessment, prepared by Illingworth and Rodkin, Inc, November 14, 2022				

Per the Noise and Vibration Assessment, the nearest noise sensitive uses will be 120 to 200 feet from the nearest construction activities. Average noise levels produced by site preparation and site improvement activities associated with construction work at this distance would range from 74 to 88 dBA. Construction activities at this distance would range from 73 to 90 dBA, with average levels of 75 to 78 dBA. Home building activities at this distance would range from 63 to 90 dBA with an average level of 77 dBA. These noise levels drop off at a rate of about 6 dBA per doubling of distance between the noise source and receptor. Most noise levels produced during site construction activities would occur at distances of 400 feet or more from adjacent noise sensitive uses and would produce average noise levels of 71 dBA.

Construction is not expected to expose adjacent existing residences to construction-related noise exceeding 60 dBA Leq for a period of greater than one year, based on the construction schedule, noise levels at varying distances, and a degree of noise attenuation once intervening structures are built. The Project would also be required to follow standard "best practice" controls from Action N1h as contained in Policy N 1.15 of the General Plan. To implement this policy and associated action **COA NOI-2** has been established and requires standard "best practice" controls as well as applicable noise standards outlined in Section 17.30.050 of the Municipal Code.

As conditioned, the Project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to vibration relative to the 2013 General Plan.

5.13I (Airfield Noise) – No Change Relative to the General Plan EIR

The proposed Project is not located within the vicinity of a private airstrip or an airport land use plan, nor is it within two miles of a public airport or public use airport. Therefore, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to airfield noise relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy N 1.2: Require development and infrastructure projects to be consistent with the Land Use Compatibility for Community Noise Environments standards indicated in General Plan Table N-1 (EIR Table 3.10-9) 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 1.8: Ensure that new development does not expose indoor sleeping areas to indoor noise levels in excess of 45 dBA Ldn.

Status: The Noise and Vibration Assessment for the Project (**Appendix F**) determined that with incorporation of sound attenuation measures as imposed by **COA NOI-1**, the Project can be constructed to meet noise level standards. As conditioned this Project complies with these policies**.**

Action N 1c: Require an acoustical study for all new discretionary projects, including development and transportation, with potential noise impacts. The study shall include mitigation measures necessary to ensure compliance with this Noise Element and relevant noise standards in the Land Use Code.

Status: Illingworth & Rodkin, Inc prepared a Noise and Vibration Assessment for the proposed Project (**Appendix F**) on June 7, 2024. The study addressed the existing and future noise environment with respect to the requirements of the City of Cotati General Plan and Cotati Municipal Code and proposed noise attenuation measures, which are imposed as Conditions of Approval. As such, the Project complies with this action.

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.

Status: Construction activities associated with the Project have the potential to result in temporary noise and vibration levels that would impact adjacent homes periodically over the course of the construction period and **COA NOI-2** is required for consistency with this policy which includes the standard noise attenuation conditions including conformance with Chapter 17.30.050 of the Municipal Code, which establishes allowable hours of operation for construction activities. As conditioned, there would be no additional construction-related noise and vibration impacts beyond those analyzed in the 2013 General Plan EIR and the Project is consistent with this policy.

Conclusion and Environmental Conditions of Approval

The Project is within the scope of development projected under the General Plan and as conditioned complies with the 2013 General Plan and would not result in any substantial new or more severe impacts to noise relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental conditions of approval are required to implement the 2013 General Plan EIR mitigating policies and actions:

COA NOI-1: Prior to issuance of the building permit, the applicant shall submit final design plans that incorporate and certify the inclusion of mechanical ventilation equipment for all apartments located in Buildings A and B with a clear view of traffic on SR-116. The mechanical ventilation shall supply fresh air via an acoustically rated straight air transfer duct such as the Fresh 80, 90 or 100-dB units by Fresh Ventilation or an equivalent unit or other system deemed satisfactory by the local building official, to provide adequate fresh air to the residences with closed windows to maintain interior noise levels at or below 45 dBA L_{dn}.

COA NOI-2: The Project shall implement best management practices to minimize construction-related noise impacts as set forth in Action N1h of the General Plan, as listed below, and shall meet all applicable noise standards as set forth in Section 17.30.050 of the Cotati Municipal Code:

1. Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm on weekdays and 9:00 am and 5:00 pm on Saturdays. No construction shall occur on Sundays or holidays.
2. All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
3. The construction contractor shall utilize “quiet” models of air compressors and other stationary noise sources where technology exists.
4. At all times during project grading and construction, stationary noise---generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences.
5. Unnecessary idling of internal combustion engines shall be prohibited.
6. Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
7. Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing.
8. 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.

5.14. POPULATION AND HOUSING

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; City of Cotati Housing Element Update 2023-2031 certified on June 2, 2023; and City of Cotati, 2023-2031 Housing Element Update: Addendum Evaluation, March 2023.

2013 General Plan EIR Findings

The 2013 General Plan EIR evaluated potential impacts to Population and Housing in Chapter 3.9 and determined the following:

- Impact 3.9-5: General Plan implementation has the potential to induce substantial population growth. Through implementation of General Plan policies and actions intended to guide growth to appropriate areas and limit land uses allowed under the proposed General Plan, population and housing growth associated with the proposed General Plan would result a less than significant impact.

- Impact 3.9-6: General Plan implementation does not have the potential to displace substantial numbers of people or existing housing. The General Plan could result in development that would remove residences, but the development allowed under the General Plan would result in an increase in the total number of residences and provide housing opportunities for persons that may be displaced as a result of development. This provision of replacement "housing opportunities" is essentially a self-mitigating aspect and implementation of the General Plan and would have a less than significant impact.

The City of Cotati 2013 General Plan EIR determined that the 2030 General Plan would accommodate approximately 2,140 new residential units within the City Limits and the Sphere of Influence through 2035. This new growth would increase the Planning Area's population by

approximately 5,243 residents. The population in Cotati in 2013 was estimated at 7,310 in the 2013 General Plan EIR. The proposed General Plan is intended to accommodate the City's fair share of statewide housing needs, which are allocated by the Association of Bay Area Governments.

The 2013 General Plan EIR determined that with implementation of General Plan policies and actions intended to guide growth to appropriate areas and provide services necessary to accommodate growth, the land uses allowed under the proposed General Plan, the infrastructure anticipated to accommodate proposed land uses, and the goal and policy framework would not induce growth that would exceed adopted thresholds but did not specify any mitigating policies. Additionally, the 2013 General Plan EIR determined that while the proposed General Plan may result in development that would remove residences, development allowed under the General Plan would result in an increase in the total number of residences and provide housing opportunities for persons that may be displaced as a result of development. This provision of replacement "housing opportunities" was found to be self-mitigating aspect as a result of implementation of the proposed General Plan and impacts from population and housing were found to be less than significant.

Project Consistency with the 2013 General Plan EIR

5.14(a) (Induced Substantial Growth) – No Change Relative to the General Plan EIR

The City of Cotati has an existing population of approximately 7,584 residents[4] which is only slightly more than the population in 2010 (7,265), and the City has not reached the growth planned in the 2013 General Plan (an additional 5,243 residents). The General Plan Housing Element establishes the policies and programs to plan for the projected population growth and units needed to accommodate the housing needs of the city.

The Project would result in the construction of 126 units within two apartment buildings. The 126 units proposed on the site were considered in the 2023-2031 Housing Element as planned units that would contribute to meeting the City's regional housing needs allocation in the Housing Element. The addendum to the General Plan EIR prepared in conjunction with the 2023-2031 Housing Element update (SCH# 2013082037) affirms that the units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan.[5]

The Project site is located within City limits and would connect to the existing water and sewer lines. As such, the Project site is served by existing services and infrastructure and will not require the extension or construction of new utilities to provide adequate service. There are no other elements of the Project that would induce growth at levels beyond what has been anticipated by the City of Cotati 2013 General Plan EIR. The project will not substantially increase the severity of the significance of impacts nor would it result in new significant impacts relative to the 2013 General Plan EIR.

5.14(b) (Displacement) – No Change Relative to the General Plan EIR

The Project site is located within the City limits and currently contains one unoccupied single-family residence that is proposed for demolition. As such, the proposed Project would not displace a

[4] City of Cotati, Housing Element 2023-2031, certified June 2, 2023.

[5] City of Cotati, 2023-2031 Housing Element Update: Addendum Evaluation, March 2023.

substantial number of people or existing housing that would require the construction of replacement housing elsewhere. The Project proposes to develop 126 dwelling units, which would provide an increase in housing. Therefore, Project impacts related to the displacement of housing or people would not exceed those analyzed in the City of Cotati 2013 General Plan EIR and the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

There are no applicable 2013 General Plan EIR mitigation measures related to Population and Housing.

Conclusion

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to land use and planning relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. No Conditions of Approval are required beyond compliance with uniformly applied development standards and applicable local and state regulations including the State Density Bonus.

5.15. PUBLIC SERVICES

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; and Memorandum from Rancho Adobe Fire Protection District prepared on February 14, 2024.

2013 General Plan EIR Findings

The 2013 General Plan EIR evaluated potential impacts to Public Services in Chapter 3.11 and determined the following:

- Impact 3.11-1: General Plan implementation has the potential to result in adverse physical impacts associated with governmental facilities and the provision of public services. Through the implementation of mitigating policies CSF 1.1 – CSF 1.3, CSF 2.28 – CSF 2.36, CSF 4.7, CSF 4.8, OS 2.1 – OS 2.6, LU 3.12, LU 3.14, LU 3.15, and LU 4.1 and mitigating actions CSF 1a, CSF 1b, CSF 2o – CSF 2s, CSF 4d, CSF 4e, OS 2a – OS 2c, implementation of the General Plan would have a less than significant impact.
- Impact 3.11-2: Implementation of the General Plan has the potential to result in adverse physical impacts associated with the deterioration of existing parks and recreation facilities or the construction of new parks and recreation facilities. Through the implementation of mitigating General Plan policies OS 2.1 – OS 2.6 and mitigating actions OS 2a – OS 2c,

implementation of the General Plan would have a less than significant impact.

The 2013 General Plan EIR determined that development accommodated under the 2013 General Plan would result in additional residents and businesses in the City, including new residential, industrial, office, and commercial uses and accommodate approximately 1,541 new residential dwelling units. The new growth was expected to increase the City's population by approximately 3,775 residents while development within the City limits and the Sphere of Influence of influence could add 2,140 new residential units or 5,243 new residents. This would result in increased demand for public services, including fire protection, law enforcement, schools, parks, libraries, and other public and governmental services. The 2013 General Plan includes policies and actions to ensure that public services are provided at acceptable levels and to ensure that development and growth does not outpace the provision of public services. The 2013 General Plan EIR concluded that the implementation of the mitigating policies CSF 1.1 – CSF 1.3, CSF 2.28 – CSF 2.36, CSF 4.7, CSF 4.8, OS 2.1 – OS 2.6, LU 3.12, LU 3.14, LU 3.15, and LU 4.1 and mitigating actions CSF 1a, CSF 1b, CSF 2o – CSF 2s, CSF 4d, CSF 4e, OS 2a, OS 2b, and OS 2c would result in a less than significant impact.

Project Consistency with the 2013 General Plan EIR

5.15(a) (Fire) – No Change Relative to the General Plan EIR

The Project site is served by the Rancho Adobe Fire Protection District (RAFD). The District was formed in 1993 through the combining of two smaller districts, the Cotati Fire Protection District and the Penngrove Fire Protection District. The RAFD provides services to the Penngrove, Cotati, and unincorporated areas of Petaluma. RAFD covers an emergency response area of roughly 86 square miles and serves approximately 28,000 people. Service is provided by three stations located at 1 East Cotati Avenue; 11000 Main Street in Penngrove and 99 Liberty Road in Petaluma. Currently, there are 13 full-time Firefighters, Engineers and Captains; three Battalion Chiefs; 24 part-time Firefighters; one part-time Fire Chief; and one Administrative Manager.

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

The Project proposes to install new water mains on site that will be sized according to City standards that would connect to existing water mains on Alder Avenue. The system is required to comply with the standards of the California Fire Code (CFC) as referenced in the City of Cotati Municipal Code 14.04.110. The Project proposes six new fire hydrants on site and relocation of an existing hydrant along SR-116 back several feet to line up with proposed improvements on SR-116. The final location of hydrants would be subject to review and approval by RAFD. Project plans have been reviewed by the RAFD and noted that final review and approval is contingent on the implementation of conditions applied to all projects.

As a standard condition of project approval, the applicant will be required to pay all applicable development impact fees, including fire suppression facilities impact fees. These funds will be sufficient to offset any cumulative increase in demands for fire protection services. Through the implementation of uniformly applied standards, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.15(b,d,e) (Police, Parks, Other) – No Change Relative to the General Plan EIR

The increase in residents and addition of commercial space may incrementally increase the demand for public services. However, new demands on police services and recreational facilities have been previously anticipated as part of General Plan buildout. As a standard condition of Project approval, the applicant will be required to pay all development impact fees applicable to a mixed-use development project, including recreation facilities impact fees. These funds will be sufficient to offset any increase in demand for public services. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.15(c) (Schools) – No Change Relative to the General Plan EIR

The proposed Project involves the construction of 126 dwelling units and a café, which is expected to result in some additional student enrollment consistent with incremental increase anticipated by the General Plan. The site is located within the Cotati-Rohnert Park Unified School District (CRPUSD). The CRPUSD includes eight elementary schools, two middle schools, and two high schools. As of August 31, 2017, total enrollment within the CRPUSD was 5,844 students.[6] The CRPUSD has a capacity to serve approximately 8,227 students;[7] therefore the school district can accommodate up to 2,383 more students.

The City of Cotati levies School Impact Fees on new development as allowed by Senate Bill 50 (SB 50). It is outlined in California Government Code Section 65996 that development fees authorized by SB 50 are considered, "full and complete school facilities mitigation." As a new development, the Project is subject to the standard payment of requisite school impact fees, which will offset any potential impacts related to school facilities. Fees will be leveraged as student enrollment reaches capacity to expand facilities as necessary. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Action CSF 2p: As part of the development review process for new projects, the City will continue to refer applications to the Rancho Adobe Fire Protection District (RAFD) for determination of the

6 Cotati-Rohnert Park Unified School District, Month Enrollment as of August 31, 2017, presented to Board of Trustees on September 15, 2017.

7 Developer Fee Justification Study for Cotati-Rohnert Park Unified School District, prepared by SchoolWorks, Inc., https://www.crpusd.org/developerfees, March 2016.

project's potential impacts on fire protection services. Requirements will be added as Conditions of Approval to project's approving resolutions.

Status: In accordance with City processing procedures, the application was routed to RAFD for initial review of the proposed project. Comments and conditions provided by RAFD on February 14, 2024 have been incorporated into the Project conditions of approval. Final plans for construction are required to be reviewed by RAFD to confirm the final design is consistent with conditions of approval and standards for development. As such, the project complies with this action.

Action CSF 2q: As part of the development review process, consult with the Police Department in order to ensure that the project design facilitates adequate police response time and public safety and that the project addresses its impacts on police services.

Status: In accordance with City processing procedures, the application was routed to the Police Department for input. The Police Department reviewed the site plans and found them adequate for police protection purposes. Prior to certificate of occupancy, the City will assess and require payment of a police services impact fee. As such, the Project complies with Action CSF 2q.

Conclusion

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to public services relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. No Conditions of Approval are required beyond compliance with uniformly applied development standards and applicable local and state regulations.

5.16. RECREATION

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015 and California State Parks Community FactFinder Report pulled from State of California Department of Parks and Recreation website on May 10, 2024.

2013 General Plan EIR Findings

The 2013 General Plan EIR evaluated potential impacts to Recreation in Chapter 3.11 and determined the following:

- Impact 3.11-2: General Plan implementation has the potential to result in adverse physical impacts associated with the deterioration of existing parks and recreation facilities or the construction of new parks and recreation facilities. Through the implementation of mitigating General Plan Policies OS 2.1 – OS 2.6 and Actions OS 2a – OS 2c, implementation of the General Plan would have a less than significant impact.

Project Consistency with the 2013 General Plan EIR

5.16(a-b) (Deterioration of Recreational Facilities, Additional Recreation Facilities) – No Substantial Change Relative to the General Plan EIR

Cotati contains a total of 15 parks. Helen Putnam Park (8.3 acres) is located approximately 1.25 miles southeast of the Project site. Additionally, Sonoma County Regional Park District (EBRPD) manages approximately 15,500 acres of open space and preserves providing regional amenities to Cotati

residents. Overall, in the City of Cotati, 76% of residents live in areas with less than 3 acres of parkland or open space per 1,000 residents.[8]

The Project would result in an increase in the City's population and potential use of parks and recreational facilities. As noted in population and housing, this increase is accounted for in the 2013 General Plan. Mitigating General Plan Action OS-2a requires that new development maintain a minimum of one acre of park land per 200 residents. According to the California State Parks Community FactFinder Report[9] for the Project site, there are 0 acres per 1,000 residents within 0.5 miles of the Project. Therefore, to comply with Action OS-2a, **COA REC-1** is established to require the dedication of parkland at a ratio of one acre per 200 residents or pay an equivalent in-lieu fee. As conditioned, the Project will not cause substantial or accelerated physical deterioration of recreational facilities and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Action OS-2a: Update the Municipal Code to establish minimum parks and open space standards for new development. At a minimum, the standards shall seek to maintain one acre of park land per 200 residents. Additional measures may include requirements to establish assessment or tax districts to fund park maintenance, open space requirements, and provisions for in-lieu fees in instances where it is not feasible or appropriate for new development to provide park land on-site.

Status: The Project will result in an increase in the number of residents and the site is located in an area where there is a ratio of 0 acres of parkland per 1,000 residents within 0.5 miles of the Project. Therefore, **COA REC-1** requires that the applicant dedicate parkland at a ratio of one acre per 200 people or pay an equivalent in-lieu fee. As conditioned, this Project complies with Action OS-2a and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

Conclusion and Environmental Conditions of Approval

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to recreation relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental conditions of approval are required to implement the 2013 General Plan EIR mitigating policies and actions:

COA REC-1: Prior to issuance of the building permit, the applicant shall dedicate one acre of parkland per 200 residents or pay an in-lieu fee as determined by the Community Development Director.

[8] California State Parks, Park Access Tool for City of Cotati, accessed on June 24, 2024. https://www.parksforcalifornia.org/parkaccess/?search=city-0616560&overlays1=parks%2Cnoparkaccess&overlays2=parks%2Cparksper1000

[9] California State Parks, Community FactFinder Report for Coordinates: 38.3334, -122.7213. Generated on May 10, 2024.

5.17. TRANSPORTATION

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☐	☒

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Technical Advisory on Evaluating Transportation Impact in CEQA, prepared by the California Office of Planning and Research, December 2018; Cotati Active Transportation Plan adopted on May 14, 2024; Guidelines for Analysis of Vehicle Miles Traveled, adopted by City of Cotati September 22, 2020; Memorandum from Rancho Adobe Fire Protection District prepared on February 14, 2024; and Traffic Impact study for Cotati Village 2 prepared by W-Trans on July 23, 2024.

2013 General Plan EIR Summary

The City of Cotati 2013 General Plan EIR identifies the City's circulation network, including the roadway network, pedestrian and bicycle facilities, transit service, park and ride lots, rail service, and truck routes. The 2013 General Plan EIR concludes that, with implementation of General Plan policies, impacts to traffic operations in the City due to funding uncertainty, traffic operations on SR-116, and traffic operations on US 101 freeway facilities would be significant and unavoidable. The following impacts to transportation and circulation were considered under the 2013 General Plan EIR:

- Impact 3.12-1: Implementation of the proposed General Plan would result in acceptable traffic operation at the study intersections and roadway segments controlled by the City of Cotati, though the ability to fully fund all identified improvements is uncertain. Implementation of mitigating General Plan Policies CI 1.1, CI 1.2, CI 1.3, CI 1.5, CI 1.7, CI 1.20, CI 3.2, CI 3.3, CI 3.4, and Actions CI 1a, CI 1b, CI 1e- CI 1g, CI 1o- CI 1r, and CI 3b are not sufficient to reduce the impacts and implementation of the General Plan would result in a significant and unavoidable impact.

- Impact 3.12-2: General Plan buildout as well as regional growth would require improvements on Gravenstein Highway, a Caltrans facility. Because the City does not control the funding or timing of these improvements, the City cannot determine that the improvements will be made in time to accommodate regional and local growth. Implementation of mitigating General Plan Policies CI 1.1, CI 1.2, CI 1.3, CI 1.5, CI 1.7, CI 1.20, CI 3.2, CI 3.3, CI 3.4, CI 4.1, CI 4.3, - CI 4.7 and Actions CI 1a, CI 1b, CI 1e- CI 1g, CI 1o- CI 1r, CI 3b, and CU 4a would not sufficiently mitigate the lack of a regional fee program, or Ir Identified source of funding. As such, implementation of the General Plan would result in a significant and unavoidable impact and no further mitigation is available.

- Impact 3.12-3: General Plan implementation would contribute to unacceptable operation on US 101 freeway facilities. The Metropolitan Transportation Commission, County of Sonoma, City of Cotati, and SCTA recognize that US 101 will experience congestion into the foreseeable future, and that there will be no further major capacity enhancements such as expansions or new freeways. Implementation of the mitigating General Plan Policies CI 3.2 – CI 3.4, CI 4.1, CI 4.4, CI 4.6, CI 4.7, LU 2.5, LU 2.10, LU 3.8, and Actions CI 3b and CI 4a would not reduce the impacts to less than significant levels and implementation of the General Plan would result in significant and unavoidable impacts.

- Impact 3.12-4: The proposed General Plan would not conflict with an applicable congestion management program. As of the writing of the 2013 General Plan EIR, there was no congestion management program for Sonoma County or the City of Cotati. As such, implementation of the General Plan would have no impact.

- Impact 3.12-5: The proposed General Plan would not result in a change in air traffic patterns. The City has no existing or planned airport facilities and is not located near any airports, approach, or departure zones. As such, the General Plan would have no impact.

- Impact 3.12-6: Implementation of the proposed General Plan would not substantially increase hazards due to a design feature. Development and infrastructure projects in Cotati would be required to comply with the General Plan, Land Use Code, and applicable state and local regulations. Through the implementation of the mitigating General Plan Policies CI 1.8, CI 1.9, CI 1.18, and CI 1.24 and Actions CI 1j, CI 1l, CI 1m, CI 1r, and CI 2f, implementation of the General Plan would result in a less than significant impact.

- Impact 3.12-7: Emergency Access. Through the implementation of the mitigating General Plan Policies CI 1.10, CI 1.14, CI 1.16 and Actions CI 1r, implementation of the General Plan would not impede emergency access and would result in a less than significant impact.

- Impact 3.12-8: The proposed General Plan would accommodate increased demand for public transit and supports a shift in trips from automobile to transit modes. Through the implementation of the mitigating General Plan Policies CI 1.6, CI 2.14 – CI 2.22, and CI 3.2 and Actions CI 2i – CI 2k, implementation of the General Plan would have a less than significant impact.

- Impact 3.12-9: The proposed General Plan is consistent with adopted bicycle and pedestrian plans and supports enhancements that emphasize bicycle and pedestrian circulation. Through the implementation of the mitigating General Plan Policies CI 1.2, CI 1.6, CI 1.9, CI 1.11, CI 1.12, CI 1.17, CI 1.19, CI 1.20, CI 1.21, CI 2.1-CI 2.13, CI 2.23, and CI 2.24, and Actions CI 1a, CI 1m, CI 1n, CI 1p – CI 1r, CI 2a – CI 2d, CI 2f – CI 2h, and CI 2l – CI 2o, implementation of the General Plan would have a less than significant impact.

- The City of Cotati adopted the Findings of Fact and Statement of Overriding Considerations on March 24, 2015, including for the significant and unavoidable impacts identified for Transportation and Circulation (Impacts 3.12-1, 3.12-2, and 3.12-3). The City findings determined that despite the significant and unavoidable impact to transportation and circulation, no other project alternative would meet the City's objective to realize the development potential of undeveloped lands for residential, office, and commercial uses necessary for housing opportunity and job growth.

Level of Service to Vehicle Miles Traveled (SB 743)

Level of service (LOS) has historically been used as a standard measure of traffic service. Pursuant to SB 743, as of July 1, 2020, lead agencies are required to evaluate transportation impacts of a project using a Vehicle Miles Traveled (VMT) metric, which focuses on balancing the needs of congestion management with statewide goals related to infill development, promotion of public health through increased active transportation facilitated by closer proximity to alternative travel modes and reduces greenhouse gas emissions.

In December 2018, the California Governor's Office of Planning and Research (OPR) published the Technical Advisory on Evaluating Transportation Impacts in CEQA, which provides recommendations for evaluating a project's transportation impact using a VMT metric, thresholds of significance, and mitigation measures. Pursuant to Government Code Section 15064.3(b), lead agencies have discretion to select the most appropriate methodology for evaluating a project's VMT impacts.

On September 22, 2020, the City of Cotati adopted VMT guidelines for analysis of vehicle miles traveled. The guidelines identify criteria, situations, and thresholds to determine VMT impacts and their significance. The 202 VMT guidelines identified that the City of Cotati maintained a residential VMT per capita of 19.42. Based on data from the February 2022 update of the SCTA model, the City of Cotati has a baseline average residential VMT of 18.3 miles per capita. Applying the City guidelines, a residential project generating a VMT that is 15 percent or more below this value, or 15.5 miles per capita or less, would have a less-than-significant VMT impact. The SCTA model includes traffic analysis zones (TAZ) covering geographic areas throughout Sonoma County that are used to determine the baseline VMT. Projects which are within a half mile of an existing major transit stop or a stop along an existing high-quality transit corridor are determined not to have significant VMT impacts.

It should be noted that LOS is still used by the City for purposes of determining consistency with general plan but is no longer used for determining significant impacts under CEQA. Pursuant to CEQA Guidelines Section 15064.3, impact significance is based upon VMT. Consistency with General Plan goals and policies related to transportation, including adopted LOS policies, will be considered by the decision-makers as part of the project review process.

Public Transit

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

Bus stops in proximity to the site are located approximately 150 feet west of the Alder Avenue and SR-116 intersection, at the southern edge of the Alder Avenue and SR-116 intersection, and along SR-116 approximately 600 feet and 820 feet east of the site.

Rail Service

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

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

The Cotati SMART station is located approximately 1.75 miles from the site.

Bike and Pedestrian Facilities

This Cotati Active Transportation Plan (ATP) was developed as a component of the Sonoma County Transportation Authority's (SCTA's) 2024 Countywide Active Transportation Master Plan and updated in 2014. While part of the Master Plan, the City of Cotati plan is also a stand-alone document to be used by the City of Cotati to guide implementation of local projects and programs and document city policy. It is also designed to be a component of the SCTA Countywide Active Transportation Master Plan to improve coordination in realizing the countywide bicycle and pedestrian system.

The purposes of the SCTA Countywide Active Transportation Master Plan are to:

- Assess the needs of bicyclists and pedestrians throughout Sonoma County in order to identify a set of local and countywide improvements and implementation strategies that will encourage more people to walk and bicycle;
- Identify local and countywide systems of physical and programmatic improvements to support bicycling and walking;
- Provide local agencies that adopt the Plan with eligibility for various funding programs, including the State Bicycle Transportation Account (BTA) which is now part of the State's Active Transportation Program;
- Act as a resource and coordinating document for local actions and regional projects; and
- Foster cooperation between entities for planning purposes and to create Geographic Information System (GIS) maps and a database of existing and proposed facilities countywide.

City of Cotati Local Roadway Safety Plan (2021)

The City Council of Cotati adopted the Local Roadway Safety Plan (LRSP) on December 14, 2021. The plan serves as a framework to systematically identify and analyze transportation safety issues, collaborate with partner agencies and stakeholder, and develop a multidisciplinary toolbox of traffic safety countermeasures. It is also a blueprint for addressing traffic safety issues throughout the County across the 4 E's of traffic safety disciplines; Engineering, Education, Enforcement, & Emergency Services. The LRSP is divided into 3 core parts. The first is an assessment of historical collision trends and patterns. The second is identification of systemic Citywide collision patterns, not at any specific location, with a framework and toolbox for countering those collision patterns. The third is identification of the highest location specific collision patterns, with recommended countermeasures to reduce collisions. The City of Cotati adopted the updated LRSP on December 14, 2021.

Vision Zero Action Plan (2022)

Developed in collaboration with the City of Cotati, the Sonoma County Vision Zero Action Plan outlines practical, evidence-based steps to build a future for Sonoma County where roads are free of fatal and life-altering crashes. Vision Zero is a traffic safety philosophy that lays out a new set of principles for engineering roads, educating travelers, and creating a sense of collective responsibility.

The Sonoma County Transportation Authority (SCTA) and Sonoma County Department of Health Services (OHS) convened the Vision Zero Advisory Committee (VZAC) and set a target goal of zero traffic deaths and severe injuries on roadways within the County by 2030. The Vision Zero plan builds on the efforts of local jurisdictions, including the City of Cotati LRSP, and other agencies and identifies the additional strategies and resources required to meet Sonoma County's Vision Zero goal. It represents a commitment to specific Vision Zero actions that are organized into six high-level goals: Create Safe Speeds, Eliminate Impaired Driving, Create a Culture of Safety, Build Safe Streets for All, Make Vehicles Safer and Reduce Private Vehicle Use, and Improve Data for Effective Decision Making. The City of Cotati adopted the Vision Zero Plan in February 2023, and will incorporate program, maintenance, and infrastructure improvement actions to address identify challenges along the City's High Injury Network (HIN).

Sonoma County Comprehensive Transportation Plan

Moving Forward 2050, Sonoma County's Comprehensive Transportation Plan (CTP), is a 25-year plan that serves as the vision for transportation throughout Sonoma County, with goals for the transportation system and the well-being of the communities. Moving Forward 2050 establishes five goals: Deliver a seamless network that allows people to use a variety of transportation types easily, affordably and dependably; Provide safe and well-maintained transportation infrastructure; Implement place-based transportation projects, tailored to urban, suburban, and rural communities that will improve local mobility; Provide zero-emission transportation opportunities that meet diverse community needs, improve health and enhance quality of life.

Projects identified in Moving Forward 2050 relative to Cotati include: updating the US 101 and Railroad Avenue Interchange; widening and rehabilitation of SR-116 between US 101 and Stony Point Road and the addition of signalized intersections, new bike lanes, and new sidewalk to improve the vehicle LOS, improve the safety of SR-116 for all modes of transportation, and create safe new corridors for pedestrian and bicyclists; Bicycle and pedestrian upgrades (citywide); constructing sidewalks along

west Cotati Avenue to close gaps; US 101/SR-116 north bound on-ramp improvements; Multimodal streetscape improvements joining all four legs of La Plaza Street around La Plaza Park; widening Old Redwood Highway for safer bike lanes, sidewalks, and center island medians; US 101/West Sierra Avenue south bound off-ramp improvements; and local street pavement rehabilitation from La Plaza to Gravenstein Highway.

Project Consistency with the 2013 General Plan EIR

5.17(a) (Conflicts with Plans, Policies, Ordinances) – No Substantial Change Relative to the General Plan FEIR

The Project's Traffic Impact Study (TIS) was completed by W-Trans on July 23, 2024 (Appendix G). The study analyzed 126 multi-family housing units and a 2,250 square foot café with access from Alder Avenue via two driveways that will intersect with Alder Ave. on the northern and southern end of the development, forming a one-way loop through the Project from north to south. The southern driveway exiting the development includes a woonerf that is approximately 160 feet long and approximately 35 feet wide. The Project also includes a Class 1 multi-use path that will run the length of the project along SR-116 and that will connect with a Class 1 multi-use path east of Alder Avenue, approved as part of the Cotati Villages 1 Project. The Class 1 path will connect to an additional proposed Class I path that will extend north along the western development limits of the Project. The proposed network of pedestrian, bicycle, and vehicle facilities is consistent with the City's General Plan Policy 1.19 which requires effective linkages to the surrounding circulation system.

The project will provide 206 parking spaces including the 44 existing spaces at the existing commercial development and the nine on-street parking spaces. Through the application of a Density Bonus Waiver in compliance with State Density Bonus Law (Government Code 65915), the proposed parking complies with the number of spaces required in the City's Land Use Code Section 17.36.050 Number of Parking Spaces Required.

Level of Service

The proposed project is expected to generate an average of 1,180 net new trips per day, including 157 a.m. peak hour trips and 82 trips during the p.m. peak hour. The General Plan Circulation Element Policy CI 1.3 calls for a minimum level of service (LOS) standard of LOS D at intersections. The TIS analyzed traffic operations at the intersections of SR-116 and Alder Avenue, and the intersection of SR-116 at West Cotati Avenue to determine the level of service under the existing conditions, existing conditions plus project conditions, baseline (existing plus approved projects), baseline plus project, an alternative baseline and alternative baseline plus project, and future, and future plus project conditions at weekday morning peak hour and weekday afternoon peak hour traffic. The results of the LOS analysis are summarized in Table 5.17.1, Table 5.17.2, and Table 5.17.3 below.

Under existing conditions, with the addition of Project-generated traffic, the southbound Alder Avenue approach would be expected to operate unacceptably at LOS F. As this is below the LOS D which is the minimum standard in Policy CI 1.3, the analysis considered options to improve the level of service. The installation of a southbound left-turn lane on Alder Avenue, which is a condition of the Cotati Village 1 project, as a stop sign controlled intersection, would result in an LOS E, which would not meet the standard. Additionally, signalization of the intersection of Alder Ave. and SR-116 was evaluated, and would result in LOS B, which would meet the minimum standard set by the General Plan, as shown in Table 5.10 below.

Table 5.10 Existing and Existing plus Project Peak Hour Intersection Levels of Service

	Existing				Existing + Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. SR-116/Alder Ave	0.7	A	0.8	A	4.3	A	1.7	A
Southbound (Alder Ave) Approach	*19.5*	*C*	*22.2*	*C*	***55.5***	***F***	*27.4*	*D*
With Southbound Left Turn Lane	-	-	-	-	**36.2**	***E***	-	-
Traffic Signal (Overall Operation)	-	-	-	-	14.6	B	-	-
2. SR-116/W Cotati Ave	0.5	A	0.9	A	0.5	A	0.9	A
Northbound (W Cotati Ave) Approach	*18.1*	*C*	*17.7*	*C*	*19.15*	*C*	*18.3*	*C*

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in italics. Bold text= deficient operation, shaded cells indicated conditions with recommended improvements (as conditioned)
Source: Transportation Impact Study, prepared by W-Trans, July 23, 2024

Similarly, under the baseline conditions which includes the approved Cotati Village Community (One) project, the proposed project would not operate at an acceptable LOS without the addition of the traffic signal, as presented in the Table below.

Table 5.11 Baseline and Baseline plus Project Peak Hour Intersection Levels of Service

	Baseline				Baseline + Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. SR-116/Alder Ave	1.3	A	1.4	A	9.8	A	2.3	A
Southbound (Alder Ave) Approach	*27.5*	*D*	*25.1*	*C*	*51.0*	***E***	*29.1*	*D*
Traffic Signal (overall operation)	-	-	-	-	18.1	B	10.9	B
2. SR-116/W Cotati Ave	0.5	A	0.9	A	0.5	A	0.9	A
Northbound (W Cotati Ave) Approach	18.6	C	18.3	C	19.9	C	18.7	C

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in *italics,* shaded cells indicated conditions with recommended improvements (as conditioned)
Source: Transportation Impact Study, prepared by W-Trans, July 23, 2024

The General Plan indicates that at buildout, the intersection of SR-116/Alder Avenue will be eliminated and replaced with the SR-116/New North-South Street intersection to the west of the Project site. This new signalized intersection would include four legs with dedicated turn lanes on each leg, as well as separate right-turn lanes on the new street approaches. The planned future widening of SR-116 would provide two through lanes in each direction between Redwood Drive and Madrone Avenue.

While this is one scenario considered by the General Plan, it is foreseeable that the new north/south street may not be feasible and only the SR-116/West Cotati Avenue intersection would be realigned and signalized with protected left turns on SR-116 and split phasing on West Cotati Avenue. In this alternative baseline scenario, it is assumed that Alder Ave. would be a stop-controlled intersection

with right-turn-in/right-turn-out only and the new Batchelor Lane (identified on plans for Cotati Village 1) would have a public access easement allowing through access to vehicles heading east to exit on Alder Ave. travel east on Batchelor Lane, and turn left at the new signalized intersection at West Cotati Ave and SR-116 (as proposed by the W. Cotati Ave. Realignment Project currently undergoing planning review). Table 5.17.3 shows the alternative baseline and alternative baseline plus project peak hour intersection levels of service which would operate at a C or better.

Table 5.12: Alternative Baseline plus Project Peak Hour Intersection LOS

	Alternative Baseline				**Alternative Baseline + Project**			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. SR-116/Alder Ave	0.5	A	0.4	A	1.0	A	0.6	A
Southbound (Alder Ave) Approach	*9.5*	*A*	*13.5*	*B*	*10.1*	*B*	*14.3*	*B*
2. SR-116/W Cotati Ave.	14.8	B	18.6	B	21.6	C	20.4	C

Under the Alternative Baseline + Project scenario, all intersections would operate at an acceptable Level of Service.

An analysis of the future conditions at the intersection at SR-116 and West Cotati Avenue was prepared by Fehr and Peers on June 4, 2024 for the State Route 116 Safety Improvement Project also known as the SR-116/W Cotati Ave. Realignment Project. The Fehr and Peers Analysis includes the traffic volumes that would be generated by Cotati Village 1 (approved), Cotati Village 2 (subject of this analysis), and Redwood Row (in planning process). It does not include the construction of the new North/South Street but does assume that Alder Ave. would have a left-turn lane for traffic turning from SR-116 onto Alder Ave. Under this scenario, left turns would be prohibited from Alder onto SR-116. Table 5.13 shows the estimated Future Plus Project conditions for the SR-116/W. Cotati Ave intersection which includes the realignment of West Cotati Ave, construction of the signal, and construction of all three residential development projects.

Table 5.13: SR-116/W. Cotati Ave. Intersection Analysis by Fehr and Peers

	Future				**Future + Project**			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
SR-116/W Cotati Ave	16.0	B	21.4	C	25.3	C	32.5	C

Source: State Route 116 Safety Improvement Project Memo prepared by Fehr and Peers on June 4, 2024.

As shown above, under the future plus project conditions for the SR-116/W. Cotati Realignment project and the buildout and operation of Cotati Village 1 (approved), Cotati Village 2 (subject of this analysis), and Redwood Row, the intersection of W. Cotati and SR-116 would operate at an acceptable level of service. While the baseline condition assumes that the intersection improvements at W. Cotati would already be in place prior to construction of Cotati Village 2, there is no set timeline for the improvements.

To ensure that the project does not result in an intersection with less than an LOS D, signalization will need to be completed at either the Alder Avenue/SR-116 intersection or at the new alignment of W.

Cotati Ave/SR-116, along with the public access easement of Batchelor Lane prior to project occupancy. To ensure a coordinated approach that effectively manages Project generated traffic in compliance with the General Plan Policy to achieve LOS D or greater, **COA TRA-1** has been established. **COA TRA-1** requires that the applicant provide the City with final plans for road improvements and signalization with a memo from a qualified traffic engineer demonstrating that the final improvement plans will result in a minimum LOS D.

Pedestrian & Bicycle Facilities

The Project proposes the construction of a Class I Multiuse Path serving bicyclists and pedestrians. The facility provides a pedestrian and bicycle circulation extension from the existing sidewalks and bike lane on Alder Avenue. The Cotati Active Transportation Plan indicates that the portion of SR-116 in front of the Project site was planned for a Class II Bike lane, and the Project proposal for a Class I facility is an improvement that provides physical separation from vehicular traffic. In order to accommodate public improvements to SR-116, a 19-foot wide area has already been dedicated as Right of Way along the entire length of the project along SR-116.

The Project provides bicycle parking to meet minimum municipal code requirements. As required by Cotati Municipal Code Section 17.36.070, a ratio of one space per ten motor vehicle spaces is required for new development. The Project plans include 206 vehicle parking spaces and 43 bicycle parking spaces which exceed the required number of bicycle parking spaces.

Public Transit

Public transit within Cotati is provided through Sonoma County Transit. Bus route 26 runs between Mirabel Park to the west of the site and Sonoma State University to the east and stops at SR-116 and Alder Avenue approximately 150 feet west of the intersection. Currently, the bus stop is unimproved and not connected via pedestrian or bicycle facilities. As determined in the Traffic Impact Study, existing transit facilities serving the project site are not adequate due to the lack of pedestrian facilities connecting to the transit stop. Therefore, **COA TRA-2** has been imposed**,** which requires that the applicant improve the bus stop located west of the SR-116 and Alder Ave. intersection to meet Sonoma County Transit Requirements and to ensure that the bus stop can be accessed from the multi-use pathway along the frontage. Depending on the future location of traffic signalization, the applicant may re-locate the bus stop to the east of the SR-116/Alder Avenue intersection.

State Highway Regulations

The California Department of Transportation (Caltrans) provided comments upon review of the project referral on March 8, 2024. The comments covered standards and the requirements that the Project would need to ensure compliance with State Highway Regulations. These included permit requirements for excessive load vehicles, permit requirements for work within the public Right of Way, and Caltrans facility requirements to meet American Disabilities Act (ADA) Standards after project completion. Caltrans also requires that the project maintain bicycle and pedestrian access during construction. **COA TRA-3** has been imposed to require implementation.

As conditioned, the Project does not conflict with a program, plan, ordinance, or policy addressing the circulation system, public transit, roadway design, bicycle, and pedestrian facilities. Therefore, as conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.17(b) (Conflict with 15064.3(b) VMT) – No Change Relative to the General Plan EIR

The Traffic Impact Study (**Appendix G**) for the Project analyzed the estimated Vehicle Miles Traveled (VMT) that would be introduced by the Project. The City uses the State of California Office of Planning and Research recommended VMT threshold of fifteen percent (15%) below the existing baseline city residential VMT per capita. Based on the Sonoma County Transportation Authority model, the baseline average residential VMT for Cotati is 18.3 miles per capita and 15 percent below this value provides a significance threshold of 15.5 miles per capita. The Project is located in Traffic Analysis Zone (TAZ) 425, which has a baseline VMT per capita of 20.2 miles. For the Project to be below the significance threshold of 15.5 per capita, VMT would need to be 23.2 percent lower than the average for the TAZ. As analyzed in the Traffic Impact Study, the Project proposes high density residential development, which is associated with lower VMT per capita compared to conventional single-family development and has a project-specific rate of 14.6 miles per capita.

City VMT guidelines indicate that a retail project under 10,000 square feet screens out from VMT analysis because this size of retail would not be likely to result in a net increase in regional total VMT. The Project includes a 2,250 square foot cafe, which would have a negligible effect on the regional total VMT. Additionally, given the size and location of the spaces, it is expected that the cafe would be local-serving. The State Office of Planning and Research (OPR) guidance recommends screening local-serving retail from VMT analysis since they introduce a greater mix of services into the urban fabric, resulting in improved proximity of retail to many residents and thereby resulting in shorter trips and a reduction in total VMT.

Therefore, the Project would not exceed VMT thresholds and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.17 (c) (Geometric Design Feature Hazard) – No Substantial Change Relative to the General Plan EIR

The site is located west of Alder Avenue and north of SR-116. At present, there is no dedicated left-turn lane to reach Alder Ave from eastbound SR-116. The approved Cotati Village Community (One) project, located east of the Alder Ave./ SR-116 intersection, included the left-turn pocket from SR-116 onto Alder Ave. in the design plans. The TIS prepared for the Cotati Village 2 Project concluded that the left-turn pocket is warranted independent of the adjacent development (Cotati Village Community (One)). As such, **COA TRA-4** has been imposed and requires the installation of a 50-foot-long left-turn pocket to accommodate traffic from the Project.

The project would create two new driveway connections into the project from Alder Avenue. Site distances at the two new intersections were analyzed using the approach travel speeds as the basis for determining the recommended site distance. Using traffic speeds measured at the proposed entrance, Alder Ave. was determined to have an 85th percentile speed of 29 miles per hour in both directions. For the purposes of the analysis, 30 mph was used. Each access would need a site distance of 290 feet to the north of the new intersections and 330 feet to the south of each new intersection for the driver to complete a left turn. As shown in **Table 5.14**, the northern intersection/driveway has a site distance of 335 feet to the north and 445 feet to the south. At the southern driveway/intersection, the site distances are approximately 385 feet to the north and 350 feet to the

south. Therefore, the sight distances are adequate for the safe movement of vehicles in and out of the Project.

Table 5.14 Sight Distances at Proposed Intersections

Location	Site Distance	
	North (ft)	South (ft)
Site Distance needed @ 30 mph	290	330
Proposed northern intersection/driveway @ Alder Ave.	335	445
Proposed southern intersection/driveway @ Alder Ave.	385	350

Source: Traffic Impact Analysis prepared by W-Trans on July 23, 2024

To ensure that sight distances shall be maintained, **COA TRA-5** has been imposed to keep sight lines free of obstructions such as signs, structures, and tall landscaping. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.17(d) Emergency Access – No Substantial Change Relative to the General Plan EIR

The Project site's primary access for emergency vehicles would be from Alder Avenue via the new Woonerf and driveway/private road, which range between 20-26 feet wide. The internal driveways and frontage improvements would be built to City and Caltrans standards as applicable. The site layout has been reviewed by the City's Engineering Division and the Rancho Adobe Fire Protection District (RAFD), which provides fire protection services to the City, for evaluation of preliminary design with regards to design standards and adequate emergency access. The standard review process of approval which is required by the RAFD includes uniformly applied requirements for emergency access.

Additionally, through the implementation of conditions, the Project will only have minor increases in delay resulting from traffic from the Project. As required by the City of Cotati Municipal Code, all signals are required to have signal pre-emption which allows appropriately equipped emergency vehicles to flip the signal to green to provide safer access through intersections. Therefore, as conditioned, the project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to emergency access relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CI 1.3: Establish a minimum motor vehicle Level of Service (LOS) standard of LOS D at intersections. The following shall be taken into consideration in applying LOS standards: (see General Plan Page 2-5 for full list of considerations)

Status: In order to ensure LOS D or better at study area intersections, signalization is required and may be accommodated at either Alder Ave or the new alignment of West Cotati Avenue with SR-116. To ensure the project achieves LOS D or greater, **COA TRA-1** has been established to require that the applicant provide final improvement plans with a memo prepared by a transportation engineering

demonstrating that both the Alder Ave. and W. Cotati Ave. intersections with SR-116 operate at an LOS D or better. As conditioned, the project is consistent with this policy.

Policy CI 1.18: Intersections shall be designed to provide adequate and safe access for all users including pedestrians, bicyclists, and motorists of all ages and abilities.

Status: The proposed Project will include the development of sidewalks, pathways, and a Class I Multiuse Path that would serve pedestrians and bicyclists and connect to the existing facilities. As conditioned by **COA TRA-5**, the Project will maintain clear sight lines, which ensures safe access. As such, the Project is consistent with this policy because it will provide adequate and safe access for all users.

Policy CI 1.20: Require new development to contribute its fair share cost of circulation improvements necessary to address cumulative transportation impacts on roadways throughout the City as well as the bicycle and pedestrian network.

Action CI 1e: As part of the development review and planning process, review general plan amendments, zone change requests, specific plans, and development projects to ensure that adequate circulation improvements are included, that the project addresses its proportional share of impacts to the City's circulation network, and that the project provides for complete streets to the extent feasible.

Action CI 1r: As part of the development review process, ensure that new development facilitates walking, biking, and transit modes; incorporates streets that are designed to maintain safe and efficient traffic flow; constructs or (if deemed appropriate by the City Engineer) contributes funds toward construction of off-site improvements necessary to mitigate traffic impacts; provides adequate emergency vehicle access; and pays development impact fees that contribute to cumulative circulation improvements.

Status: The Project is subject to payment of City development impact fees as a new development project. Impacts fees, as required by Municipal Code Chapter 4.10 Traffic Impact Fee, contribute fair share costs to circulation improvements for the Project's proportional share of impacts to the City's circulation network. The traffic impact fees are calculated and required through the uniformly applied building permit review process. As such, the project is consistent with these policies.

Action CI 1l: Require developers to design local roadways (i.e., streets other than arterials and collectors) for speeds of 25 miles per hour or less.

Status: The construction of streets within the site would be required to comply with the uniformly applied standards in Municipal Code Section 17.26.030 Street and streetscape standards. Section E requires a maximum speed limit of 20 miles per hour. Through the application of this standard, the Project is consistent with this policy.

Action CI 1q: As part of the development review process, require new development to mitigate circulation impacts by making improvements to the motorized and non-motorized circulation networks as necessary, and in a fair manner with an established nexus between the level of impact and required improvements and/or contributions.

Status: The Project design and **COA TRA-1 through TRA-5** ensure that the project will not have circulation impacts that result from the project. As conditioned, the Project is consistent with this policy.

Conclusion and Environmental Conditions of Approval

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to transportation relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental conditions of approval are required to implement the 2013 General Plan EIR mitigating policies and actions:

COA TRA-1: The Applicant shall provide public improvement plans to the City for review and acceptance prior to issuance of a grading permit. The final plans shall include signalization at either the intersection of Alder Avenue/SR-116 or the signalization of W. Cotati Ave/SR-116. If no signal is installed at Alder Avenue, final improvement plans shall include a physical barrier designed in compliance with Caltrans Highway Design Manual to prevent left turns from Alder Avenue onto SR-116 and shall also include a public access easement to allow vehicles to use Batchelor Lane (through Cotati Village 1). A memo from the Project's traffic engineer confirming that the final plans are designed to achieve intersection operation at Level of Service D or greater. The final plans shall be reviewed and accepted by the City's Engineer prior to issuance of a grading permit and shall be fully installed prior to issuance of a certificate of occupancy for the project.

COA TRA-2: The applicant shall improve the bus stop located west of the SR-116 and Alder Ave. intersection to meet Sonoma County Transit Requirements and shall include a shelter, a bench, and ADA access to the proposed multi-use pathway along SR-116 as well as any other elements required by Sonoma County Transit Authority. The bus stop may be relocated east of Alder Avenue if a signal is installed at W. Cotati/SR-116 intersection and not at the Alder Avenue/SR-116 intersection.

COA TRA-3: The Project shall comply with all requirements from Caltrans to address design, engineering, and operation requirements within the State right-of-way. Prior to commencing any work in the public right of way, the applicant shall secure an encroachment permit from Caltrans and provide the following to Caltrans:

1. Detailed information regarding any connections and or modifications to State drainage systems must be provided.
2. Any engineering calculations for onsite systems out-letting to State drainage systems (pipe or ditch) must be provided, such as flow rates for shed areas, detention time for detention basins, etc. If additional runoff is generated from the site and drains towards SR-116, the runoff must be metered to pre-construction levels.

The applicant shall provide a copy of the approved encroachment permit to the City prior to commencing work within the public right of way. If Project work requires the movement of oversized or excessive load vehicles on State roadways, the Applicant shall secure a transportation permit from Caltrans and provide a copy to the City.

COA TRA-4: The Applicant shall install a 50-foot-long left-turn pocket on SR-116 at the eastbound approach to Alder Avenue, or as otherwise approved by the City Engineer. If signalized, the southbound Alder Avenue approach to SR-116 shall be restriped to include a separate left-turn lane. The left-turn lane and restriping plan shall be submitted to the City Engineer for review and approval prior to building permit issuance. All required approvals shall be obtained from Caltrans and submitted to the City.

COA TRA-5: Final landscaping plans shall be submitted and show compliance with Cotati Municipal Code (CMC) Section 17.30.040(c)(2). Final landscaping plans shall include the specific plants that will be placed in the traffic safety visibility area (see CMC Section 17.30.040.E) and their maximum projected height which shall be no taller than 36 inches except for trees with their canopy trimmed to a minimum of eight feet above grade. These standards shall be applied to access drive from Alder Avenue, as well as the intersections of the multi-use path and Alder Avenue.

5.18. TRIBAL CULTURAL RESOURCES

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Cultural Resources Study, prepared by Tom Origer & Associates on June 23, 2016; Cultural Resources Addendum prepared by Evans and De Shazo on May 31, 2024; and AB52 Project Notification dated September 7, 2023.

According to Public Resources Code (PRC) Section 21074, tribal cultural resources are defined as follows:

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

2013 General Plan EIR Findings

As stated in Section 3.4 Cultural Resources, the 2013 General Plan EIR determined that General Plan implementation could result in a substantial adverse change in the significance of an historical or archaeological resource, including tribal cultural resources. Through the implementation of mitigating General Plan Policies CON 4.1, CON 4.3 – CON 4.6, and mitigating actions CON 4a – CON 4c, and CON 4f, implementation of the General Plan would have a less than significant impact.

Additionally, implementation of the General Plan could result in the disturbance of human remains. Through the implementation of General Plan Policies CON 4.2 and Action CON 4c and compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98, the implementation of the General Plan would have a less than significant impact.

Project Consistency with the 2013 General Plan EIR

5.8(a.i-ii) (Listed or Eligible for Listing, Significant Tribal Resources) – No Substantial Change Relative to the General Plan EIR

In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the FIGR on August 8, 2023, which included a brief description of the proposed project and its location, the City of Cotati's contact information, and a notification that the Federated Indians of Graton Rancheria has 30 days to request consultation pursuant to this section. The City of Cotati received a response requesting consultation under PRC Section 21080.3.1(b)(2) from the FIGR on September 7, 2023. The City of Cotati entered into consultation with FIGR and provided requested information on October 5, 2023. Subsequent correspondence resulted in a request from the Tribe to review the CEQA Analysis, which was provided to the Tribe on June 10, 2024. No response was received.

The Cultural Resources Inventory prepared for the Project site determined that no significant or potentially significant cultural resources will be impacted by development (**Appendix D Confidential**). No evidence of cultural resources was observed on site during the surface inspection. Due to past grading activities the original surface is no longer extant and any subtle cultural features that

may have been present would have been removed. Although unlikely, the potential exists for unknown, buried cultural resources to be discovered during development. **COA CUL-1**, establishes procedures to be implemented in the event that significant archaeological and historic resources, including tribal resources, are discovered during construction. Due to the former presence of a pre-1920 residence, the site has the potential to contain historic era resources, and **COA CUL-2** is imposed, which requires an Archaeological Monitoring Plan (AMP). As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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.

Status: In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the FIGR on August 8, 2023, which included a brief description of the proposed project and its location, the City of Cotati's contact information, and a notification that the Federated Indians of Graton Rancheria has 30 days to request consultation pursuant to this section. The City of Cotati received a response requesting consultation under PRC Section 21080.3.1(b)(2) from the FIGR on September 7, 2023. The City of Cotati entered into consultation with FIGR and provided requested information on October 5, 2023. Subsequent correspondence resulted in a request from the Tribe to review the CEQA Analysis, which was provided to the Tribe in June 2024 and no response was received.

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: (see Cultural Resources for full list)

Status: **COA CUL-1** requires the implementation of the required protocol in Action CON 4c. As such, the Project complies with this policy.

Conclusion

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to recreation relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. **COA CUL-1** and **COA CUL-2** (see Cultural Resources section) are required to implement the 2013 General Plan EIR mitigating policies and actions.

5.19. UTILITIES AND SERVICE SYSTEMS

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; City of Cotati Municipal Code; Sonoma County Water Agency 2020 Urban Water Management Plan, prepared by Brown and Caldwell, June 2021; Water and Wastewater Assessment Report prepared by Carollo on September 2023; and City of Cotati Public Works Conditions of Approval prepared February, 2024.

2013 General Plan EIR Findings

The 2013 General Plan EIR evaluated potential impacts to Utilities and Service Systems in Chapter 3.13 and determined the following:

- Impact 3.13-1: General Plan implementation has the potential to result in an increased

demand for water supplies. However, through implementation of mitigating General Plan Policies CSF 1.1-1.6, CSF 2.1- CSF 2.1 and Actions CSF 1a, CSF 1b, CSF 2b- CSF 2g, implementation of the General Plan would have a less than significant impact.

- Impact 3.13-2: General Plan implementation would not result in the construction of a new water treatment facility or expansion of existing facilities, which could cause significant environmental effects because the projected 2035 water supplies are adequate to meet demand that would be generated by buildout of the 2013 General Plan.

- Impact 3.13-3: General Plan implementation has the potential to exceed wastewater capacity or the requirements of the RWQCB. Upon full buildout of the 2013 General Plan within the City limits, total ADWF is projected to be 0.74 mgd. Within the entire Planning Area, the ADWF would be 0.83 mgd upon full buildout of the General Plan. These ADWF projections exceed the projections used in the 2011 Sewer Collection System Master Plan. Even with mitigating General Plan Policies CSF 1.1-CSF 1.6 and CSF 2.16 – CSF2.27 and Actions CSF 1a, CSF 1b, CSF 2h-2n, implementation of the General Plan would result in a cumulatively considerable significant and unavoidable impacts.

- Impact 3.13-4: General Plan implementation has the potential to require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Through the implementation of mitigating Policies CSF 2.20, CSF 2.22, and CSF 2.24 implementation of the 2013 General Plan would have a less than significant impact.

- Impact 3.13-5: General Plan implementation would be served by a landfill for solid waste disposal needs and will require compliance with various laws and regulations. Through implementation of the mitigating General Plan Policies CSF 3.1-CSF 3.8 and Actions CSF 3a-CSF 3e, implementation of the 2013 General Plan would have a less than significant impact.

- The City of Cotati adopted the Findings of Fact and Statement of Overriding Considerations on March 24, 2015, including for the significant and unavoidable impacts identified for utilities and service systems (Impact 3.13-3). The City findings determined that despite the significant and unavoidable impact to utilities and service systems, no other project alternative would meet the City's objective to realize the development potential of undeveloped lands for residential, office, and commercial uses necessary for housing opportunity and job growth.

Project Consistency with the 2013 General Plan EIR

5.19(a) (Relocation or Expansion of Utilities) – No Change Relative to the General Plan EIR

The Project is not anticipated to induce substantial growth in the area, either directly or indirectly, beyond what has been anticipated by the General Plan. The increase in residents, introduced by the

proposed project, will incrementally increase the demand for water supplies, wastewater treatment, and solid waste disposal.

The Project site is located within City limits and is currently served by existing utilities and service systems. New service connections will be required to tie into the existing facilities, which are located on SR-116 and Alder Avenue. The City of Cotati's Engineer has confirmed in the February 29, 2024 letter that the Project can be served by the City's water distribution system and wastewater conveyance system and that there is sufficient water, wastewater, and off-site water supply for domestic and fire suppression purposes, which will be furnished on demand without exception to each lot/unit. Demand for utilities and service systems generated by the Project is anticipated by the 2013 General Plan EIR and does not require the relocation or expansion of infrastructure.

Therefore, the Project will not result in the relocation, construction, or expansion of utilities, and as such will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.19(b) (Sufficient Water Supplies) – No Substantial Change Relative to the General Plan EIR

The Project would generate water demand consistent with the buildout projections of the General Plan. The City of Cotati receives potable water supplies through a contract with Sonoma Water, the regional wholesale water provider. Water supplies provided by Sonoma Water are sourced principally from the Russian River to eight water contractors, other water transmission system customers, and to the Marin Municipal Water District (Marin Water). Sonoma Water prepared an Urban Water Management Plan (Plan) in 2020 that addresses the water transmission system and includes a description of the water supply sources, historical and projected water use, and a comparison of water supply to water demands during normal, single-dry, and multiple-dry years.

The Sonoma Water UWMP anticipates that 592 acre feet of potable water supplies were provided to the City of Cotati in 2020 and that deliveries to Cotati will increase to 1,215 acre feet per year by 2045. The Sonoma Water UWMP concludes that that potable water demand for all users, including the City of Cotati, is within the available supply, during normal water years for cumulative demand through 2045. Sonoma Water has adequate water supplies through the 2045 planning horizon, except for single-dry years, starting after 2025. During single dry years Sonoma Water works with all wholesale customers to reduce water usage in accordance with the Water Shortage Contingency Plan set forth in the UWMP.

The City of Cotati Municipal Code Chapter 13.30 Water Shortage Contingency Plan contains provisions for water conservation during water shortages. Through the implementation of these actions, the City reduces water usage during drought years to ensure sufficient resources to adequately serve all customers in accordance with the requirements of the UWMP.

At the project-level, a Water and Wastewater Assessment Report was prepared that anticipated the water demand generated by the project to be approximately 21,645 gallons per day (gpd) for Average Day Demand, 51,947 gpd for Maximum Day Demand, and 77,921 gpd for Peak Hour Demand. The City Engineer has reviewed the Project plans and assessment report and determined that the anticipated water demand for the Project can be met by existing and planned water resources, along with all other existing and planned water demands. The final plans and assessment report are required to be submitted to the City Engineer prior to issuance of a building permit in accordance with **COA UTI-1**.

Further, the Project is required to incorporate water efficient development standards consistent with all applicable State and Cotati municipal code requirements. The Project is required to adhere to the Water Conservation Ordinance contained in Chapter 13.30 of the City of Cotati Municipal Code. Additionally, the Project is subject to Municipal Code Chapter 17.34, which requires compliance with standard water efficient landscaping standards. **COA UTI-2** requires that final plans showing incorporation of water efficiency requirements be submitted and confirmed prior to building permit issuance.

Further, to ensure that the Project contributes its fair share toward necessary water infrastructure and supply **COA UTI-3** has been imposed and requires the applicant to execute a City standard Public Improvement Agreement to address the proposed public improvements. The agreement shall address design, construction, and dedication of and City acceptance of the public improvements. **COA UTI-3** also requires also requires that the site be annexed into the Community Facilities District (CFD).

As conditioned, the water supplies are sufficient to meet existing water demands of the Project and other existing and planned future water users during normal, single, and multiple dry year scenarios and the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.19(c) (Wastewater Capacity) – No Substantial Change Relative to the General Plan EIR

The 2013 General Plan EIR concluded that even with implementation of the policies and action items in the General Plan, an increase in permitted capacity at the Laguna Wastewater Treatment Plant cannot be guaranteed, and impacts were considered cumulatively considerable, and significant and unavoidable. As part of the development review process, the City Engineer of the City of Cotati will determine adequacy and compliance of the Project with the City's sewer system requirements and compliance with the City of Cotati Sewer Collection System Master Plan, Urban Water Management Plan, and Water Distribution System Master Plan. A Water and Wastewater Assessment Report was prepared for the Project that anticipated the wastewater generation to be approximately 18,282 gallons per day (gpd) for Average Dry Weather Flow, 27,789 gpd for Peak Dry Weather Flow, and 33,409 gpd for Peak Wet Weather Flow.

The City Engineer has reviewed the Project plans and Assessment Report and determined that the anticipated wastewater generation from the Project can be met by wastewater infrastructure. The final plans and Assessment Report are required to be submitted to the City Engineer to confirm wastewater generation of final plans can be met by utilities prior to permit issuance under condition of approval **COA UTI-1**.

As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.19(d-e) (Solid Waste Generation and Compliance with Solid Waste Management) – No Change Relative to the General Plan EIR

The 2013 General Plan EIR concluded that General Plan implementation would be served by a landfill for solid waste disposal needs and will require compliance with various laws and regulations, and the impact would be considered a less than significant impact.

During construction, the Project would generate solid waste from concrete and asphalt from the removal of existing improvements and vegetation waste from tree removal. The applicant will be

required to recycle or salvage at least 65 percent of nonhazardous construction and demolition waste and prepare a Construction Waste Management Plan that documents the diversion of materials as required by CalGreen.[10] The Project will be required to comply with Cotati Municipal Code Section 17.39.030.G(5), which requires coordination with refuse pickup providers to determine the adequate size and number of containers required to accommodate all waste streams (landfill, recycling, and composting). Therefore, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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.

Status: As part of the development review process, the City Engineer has reviewed the Project, including the Water and Wastewater Assessment Report. The City's Engineer determined that the City's facilities are adequate to serve the Project. As such, the Project is consistent with this policy.

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.

Status: Through the building permit review process, the Project Applicant will be required to pay water and sewer connection fees that are intended to cover the maintenance and incremental expansion of facilities as planned to accommodate buildout of the General Plan. Through implementation of the uniformly applied development standards in the Municipal Code, the Project is consistent with this policy.

Policy CSF 1.3: Limit approvals of new development to areas where adequate infrastructure and services are available or will be provided by the development.

Status: The Project site is located within City limits and is currently well served by existing utilities and service systems. New service connections will be required that tie into the existing facilities, which are located along Alder Avenue and SR-116. The connection of new services is anticipated by the General Plan and does not require substantial infrastructure improvements or enhancements to adequately serve the Project. As such the Project is consistent with this policy.

Policy CSF 1.6: Require development, infrastructure, and long-term planning projects to be consistent with all applicable City plans and programs related to public services and facilities, including but not limited to the Water Master Plan, the Sanitary Sewer Master Plan and the Capital Improvement Plan. New projects shall assist with the implementation of these plans through the provision of fair-share payments, construction of improvements, or other means identified as appropriate by the City Engineer.

10 California Green Building Standards Code (2022), Effective January 1, 2023.

Status: Prior to issuance of a building permit, the applicant is required to pay development impact fees for incremental increase in demand for public services and facilities, as well as comply with all Public Works/Engineering's Conditions of Approval. Therefore, the project is consistent with this policy.

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 storage, 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.

Action CSF 2a: As part of the development review process, determine the potential impacts of development and infrastructure projects on the water system and ensure that new development contributes its fair share toward necessary water infrastructure and supply. The Planning Department and the City Engineer shall be responsible for ensuring that the assessments are made.

Status: The City Engineer has determined that the Project will adequately connect to and comply with the City's sewer system requirements and compliance with the City of Cotati Sewer Collection System Master Plan, Urban Water Management Plan, and Water Distribution System Master Plan. Additionally, the City requires that the Project enter into a Public Improvement Agreement (PIA). The City also requires that the site be annexed into the Community Facilities District (CFD) and **COA UTI-3** is required. As conditioned, the Project complies with this policy and action.

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.

Status: The Project site plan identifies two trash enclosures on site that are separate from the buildings. Exterior storage areas for waste would be composed of durable materials, including split-faced CMU block and a metal covering, and would be located in the parking area next to tree-lined landscaping strips. As such, the Project design is consistent with this policy.

Conclusion and Environmental Conditions of Approval:

COA UTI-1: The final plans and a final Water and Wastewater Assessment Report shall be submitted by the Applicant and reviewed/accepted by the City Engineer to confirm water demand and wastewater generation of final project design can be met by utilities prior to permit issuance.

COA UTI-2: The applicant shall submit landscape and irrigation plans for plantings at the time of the Improvement Plan submittal package. All landscaping and irrigation shall comply with the City Water Efficient Landscape Ordinance (WELO) and is subject to review and approval by the City Engineer. Prior to issuance of a certificate of occupancy, all plantings and irrigation systems in the approved final landscaping plan shall be completed.

COA UTI -3: The applicant shall execute a City standard Public Improvement Agreement to address the proposed public improvements. The agreement shall address design, construction, dedication of,

and City acceptance of the public improvements. The agreement shall include and engineer's cost estimate for the public improvements, security for the completion of these improvements, an initial deposit and execution of the City's deposit account agreement for City inspection of the construction of the public improvements. The agreement shall be submitted for review and approval by the City. The agreement shall also address the ownership, maintenance, lighting, parking, access and shall be recorded against the lands of the project. The site shall be annexed into the Community Facilities District.

5.20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
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?	☐	☐	☐	☒

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; State Responsibility Area Fire Hazard Severity Zones April 1, 2024; State Responsibility Area Fire Hazard Severity Zones November 2007; Local Responsibility Area Fire Hazard Severity Zones November 2008; and Memorandum from Rancho Adobe Fire Protection District prepared on February 14, 2024.

2013 General Plan EIR Findings

The 2013 General Plan EIR addressed impacts related to wildfire hazards in Chapter 3.7 – Hazards. The following impact related to wildfires was considered under the 2013 General Plan EIR:

- Impact 3.7-6: The General Plan does not have the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Through the implementation of mitigating General Plan Policies CSF 2.28-CSG 2.32, CSF 2.36, and SA 1.1 - SA 1.7 and Actions CSF 2o, CSF 2p, CSF SA 1a, and SA 1d, implementation of the 2013 General Plan would have a less than significant impact.

Mitigating policies and actions provided in the General Plan are included in the 2013 General Plan EIR to ensure public facilities are able to respond to wildfire emergencies, effective coordination between fire districts, and maintenance of emergency response facilities and infrastructure. Individual projects are directed to be reviewed by the City and the Rancho Adobe Fire Protection District for code compliance. The California Department of Forestry and Fire Protection (CalFire) has identified the site as being located outside of a State Responsibility Area (SRA) and Local Responsibility Area (LRA) Fire Hazard Severity Zone.

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

SONOMA COUNTY HAZARD MITIGATION PLAN

On September 28, 2021, the Cotati City Council adopted the Sonoma County Multijurisdictional Hazard Mitigation Plan (HMGP) to guide pre- and post-disaster mitigation of identified hazards. The plan includes actions to mitigate current risk from hazards and changes in hazard impacts resulting from climate change, including wildfires. The plan includes Best Management Practices to Mitigate the Wildfire Hazard. These practices include what are called “personal scale” alternatives such as:

- Clear overgrown underbrush and diseased trees;
- Create and maintain defensible space around structures;
- Regular mowing/landscape maintenance;
- Use of fire-resistant building materials;
- Employ techniques from the Firewise USA Program; and
- Installing or replacing roofing with non-combustible materials.

Sonoma County Community Wildfire Protection Plan

In June 2023, the County Community Wildfire Protection Plan (CWPP) was incorporated by reference into the Sonoma County Annex of the Multi-Jurisdiction Hazard Mitigation Plan (MJHMP). Part of this plan includes the Sonoma County Wildfire Risk Index (WRI). Published on November 17, 2022, the WRI predicts relative wildfire risk. The Wildfire Risk Analysis divides the county's landmass into 100-acre hexagons which are assigned a risk level. While each hexagon is assigned an overall risk level, conditions may vary significantly within the shape. It is entirely possible that areas of relatively low risk could exist within a polygon whose overall risk is high. The purpose of the CWPP and WRI is to inform planning to improve wildfire resiliency.

Project Consistency with the 2013 General Plan EIR

5.20(a-d) (Impair Emergency Plans, Exacerbate Wildfire Risks, Infrastructure Contribution to Risks, Exposure to Wildfire-Related Risks) – No Change Relative to the General Plan EIR

The Project is consistent with the allowable uses under the land use designations in the General Plan. As such, the Project would not conflict with an emergency plan in that the General Plan accounts for the impacts of the planned development under the 2013 General Plan EIR. The Project site is not located in the VHFHSZ as provided by CalFire and is not within a watercourse or significant slope that may become unstable following a wildfire. Additionally, the Project falls under the jurisdiction of the Rancho Adobe Fire Protection District who implements the fire resiliency requirements in the Sonoma County Multijurisdictional Hazard Mitigation Plan. The project has undergone initial review by RAFD and plans have been determined to be adequate with standard conditions applied to all projects. Therefore, the Project would not conflict with an emergency plan, interfere with emergency access, or otherwise exacerbate wildfire risk. Through the application of uniformly applied standards in the building and fire codes, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CSF 2.30: Design and maintain City streets in such a way so as to maintain acceptable emergency vehicle response times.

Action CSF 2p: As part of the development review process for new projects, the City will continue to refer applications to the Rancho Adobe Fire Protection District for determination of the project's potential impacts on fire protection services. Requirements will be added as Conditions of Approval to project's approving resolutions.

Action CSF 2o: Continue to enforce the California Building Code and the California Fire Code to ensure that all construction implements fire-safe techniques, including fire resistant materials, where required.

Status: The project was reviewed and conditioned by the Rancho Adobe Fire Protection District on February 14, 2024 to ensure compliance with uniformly applied standards for fire safety and emergency vehicle access. The final Project plans will be reviewed by Rancho Adobe Fire Protection District for review and approval. Construction plans will be routed to the District for confirmation that final design meets emergency access requirements. Through the implementation of uniformly applied development standards, the Project is consistent with this policy and associated actions.

Conclusion

The Project is within the scope of development projected under the General Plan and through the application of uniformly applied standards would not result in any substantial new or more severe impacts to wildfire relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. No Conditions of Approval are required beyond compliance with uniformly applied development standards and applicable local and state regulations.

5.21. MANDATORY FINDINGS OF SIGNIFICANCE

	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; and Public Works/Engineering Conditions of Approval prepared on September 27, 2023.

2013 General Plan EIR Findings

Under the requirements of CEQA, an EIR is required to discuss cumulative impacts to which the project would contribute. A cumulative impact is defined as an impact resulting from the combined effects of past, present, and reasonably foreseeable future projects or activities. The 2013 General Plan EIR concluded that implementation of the General Plan to Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gasses and Climate Change, Hazards, Hydrology and Water Quality, Land Use and Population, Agriculture, Public Services, and Recreation.

The 2013 General Plan EIR determined that the implementation of the General Plan would result in the following Cumulative impacts:

- Impact 3.10---7: Cumulative Noise Impacts (Significant and Unavoidable)
- Impact 3.13---3: Potential to exceed wastewater treatment capacity or the requirements of the RWQCB (Cumulatively Considerable and Significant and Unavoidable)
- Impact 4.1: Cumulative Degradation of the Existing Visual Character of the Region (Considerable Contribution and Significant and Unavoidable)
- Impact 4.11: Cumulative Exposure of Noise---Sensitive Land Uses to Noise in Excess of Normally Acceptable Noise Levels or to Substantial Increases in Noise (Considerable Contribution and Significant and Unavoidable)
- Impact 4.13: Cumulative Impact on the Transportation Network (Considerable Contribution and Significant and Unavoidable)
- Impact 4.14: Cumulative Impact on Utilities (Considerable Contribution and Significant and Unavoidable)
- Impact 4.15: Irreversible Effects (Significant and Unavoidable)

Project Consistency with the 2013 General Plan EIR
5.21(a-c) (Threaten to eliminate a biological resource or cultural resource, cumulatively considerable, substantial adverse effects) – No Substantial Change Relative to the General Plan EIR

The proposed Project is consistent with both the General Plan Land Use Designation of General Commercial and Zoning designation of Commercial, Gravenstein Corridor (CG). The Project Conditions of Approval ensure that the Project complies with the policies and actions of the 2013 General Plan. Additionally, and as noted throughout this document, the Project shall comply with the federal, state, and local regulations including the uniformly applied standards of the City of Cotati Municipal Code.

Further, the Project has been reviewed by the City of Cotati Planning Department, Building Department, Public Works and Engineering Department, and the Rancho Adobe Fire Protection District. The development review has established over 130 project conditions to ensure that the project complies with the City of Cotati Municipal Code and all pertinent regulations, thus ensuring that the project will not have a cumulatively considerable or substantially adverse effect as a result of the project.

Additionally, there are three other proposed projects in the vicinity, the Cotati Village Community and Redwood Row projects to the east, and the SR-116/West Cotati Avenue Realignment southeast of the site. While these projects are on different timelines, it is possible that construction activities may overlap. In order to prevent cumulative effects from multiple projects, **COA MF-1** requires the applicant to coordinate with the City to coordinate concurrent construction and reduce any possible lane closures, haul trips, and minimize dust and noise as much as feasible.

The Project's effects on Level of Service at SR-116 and Alder Avenue and West Cotati Avenue have been considered in relationship to the two other development projects proposed as well as future signalization of W. Cotati Ave. **COA TRA-1** requires the final plans be submitted with confirmation that they will meet the minimum Level of Service Requirement prior to final approval. **COA TRA-1** also

requires the installation of the improvements prior to issuance of the certificate of occupancy. This ensures that the final traffic improvement plans will not result in cumulative effects to transportation.

The Project is within the scope of development projected under the General Plan and is conditioned as such that it would not result in any substantial new or more severe impacts relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The environmental conditions of approval that implement the 2013 General Plan EIR mitigating policies are listed in section 7 including the following:

COA MF-1: The applicant shall coordinate the project's construction activities and construction schedule with the City to coordinate the concurrent construction of projects within 1,000 feet of the project site to ensure that overlapping lane closures, periods of increased noise and dust generation are minimized to the extent practicable.

6. REFERENCE DOCUMENTS

The following reference documents are hereby incorporated by reference and are available for review during normal business hours at Cotati City Hall 201 W. Sierra Avenue in Cotati, CA.

6.1. TECHNICAL APPENDICES

A. Air Quality and Greenhouse Gas Assessment prepared by Illingworth and Rodkin on June 5, 2024 .

B. Biological Resource Analysis for Cotati Village Site prepared by Monk and Associates on October 11, 2022 and Letter confirming current validity of findings prepared by Monk and Associates on June 3, 2024.

C. Tree Inventory Report for Cotati Village Community Two prepared by Horticultural Associates on April 30, 2024.

D. Cultural Resources Addendum prepared by Evans and De Shazo on May 31, 2024. NO PUBLIC DISTRIBUTION

E. Phase I Environmental Assessment prepared by Property Solutions Inc. on August 3, 2011.

F. Cotati Village Noise and Vibration Assessment prepared by Illingworth and Rodkin Inc on June 7, 2024.

G. Transportation Impact Study for the Cotati Village Project prepared by W-Trans on July 23, 2024.

6.2. OTHER DOCUMENTS REFERENCED

1. *Cotati Village Community 2 Plan Set* prepared by Trachtenberg Architects on May 23, 2024.
2. *2022 California Green Building Standards Code (CalGreen)*, Effective January 1, 2023.
3. *Air Quality and Greenhouse Gas Assessment for Cotati Village Community (1)* prepared by Illingworth and Rodkin on November 17, 2022.
4. *Geotechnical Feasibility Evaluation* prepared by Miller Pacific Engineering Group on April 15, 2015 and follow up memo prepared on April 17, 2024 by Miller Pacific Engineering.
5. *Preliminary Hydrology & Hydraulics Study for Cotati Village Community Two* prepared by Civil Design Consultants on February 1, 2024.
6. *Stormwater Low Impact Development Submittal for Cotati Village 2* prepared by Civil Design Consultants, Inc on February 1, 2024.
7. *Cotati Village 1 & 2 Water and Wastewater Assessment Report* prepared by Carollo for the City of Cotati on September 26, 2023.
8. *BAAQMD 2022 Bay Area Clean Air Plan*, prepared by the Bay Area Air Quality Management District, April 2022.
9. *BAAQMD CEQA Guidelines*, prepared by the Bay Area Air Quality Management District, April 2022.

10. *BAAQMD Recommended Methods for Screening and Modeling Local Risks and Hazards*, prepared by the BAAQMD, May 2011.

11. *California Code, Government Code Section 66477*.

12. *California Code, Health and Safety Code Section 25501(n)(1*).

13. *California Scenic Highway Mapping System, Scenic Highway System Lists*, Cal Trans. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed December 15, 2023.

14. *California Department of Conservation Farmland Mapping and Monitoring Program* website accessed on December 26, 2023. https://maps.conservation.ca.gov/dlrp/ciff/

15. *City of Cotati Municipal Code*. https://www.codepublishing.com/CA/Cotati

16. C*limate Action 2020 and Beyond: Sonoma County Regional Climate Action Plan*, prepared by Sonoma County Regional Climate Protection Authority, July 2016.

17. *City of Cotati Active Transportation Plan*, adopted on May 14, 2024.

18. *Cultural Resources Study for the Proposed Residential Care Facility at 8145 Highway 116 and 7515 Alder Ave.*, Cotati, Sonoma, County, CA prepared by Tom Origer & Associates on June 23, 2016.

19. *EnviroStor*, managed by the Department of Toxic Substances Control, accessed September 2023.

20. *Fire Hazard Maps*, Office of the State Fire Marshal, April 1, 2024.

21. *GeoTracker*, managed by the State Water Resources Control Board, accessed September 2023.

22. *Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin* prepared by Sonoma Water, December 2021.

23. *Guidelines for Analysis of Vehicle Miles Traveled*, adopted by City of Cotati September 22, 2020.

24. *Initial Study and Mitigated Negative Declaration for a Zoning Amendment and Residential Care Facility for the Elderly and a Commercial Building* prepared by M-Group and adopted by City of Cotati City Council on November 12, 2019.

25. *Local Responsibility Area Fire Severity Zone Map*, Office of the State Fire Marshal, November 2007.

26. *Moving Forward 2050: Sonoma County Comprehensive Transportation Plan (CTP)* prepared by Sonoma County Transportation Authority and updated on September 7, 2021.

27. MTC/ABAG Hazard Viewer Map, accessed June 12, 2024.

28. *National Flood Hazard Layer*. FEMA. September 2023. https://www.fema.gov/flood-maps/national-flood-hazard-layer

29. *Public Works Conditions of Approval for Cotati Village Two Conditions of Approval* prepared by City of Cotati Department of Public Works and Engineering, February 29, 2024

30. Rancho Adobe Fire District Memorandum on Permit PA#23-1- 3rd Submittal (dated 2/7/2024) prepared on February 14, 2024.

31. *Recovery Plan for the Santa Rosa Plain*, US Fish and Wildlife Service (USFWS), 2016.

32. *Reinitiation of Formal Consultation on Issuance of Clean Water Act, Section 404 Permits by the U.S. Army Corps of Engineers (Corps) on the Santa Rosa Plain*, Sonoma County, California, prepared by USFWS, 2020.

33. *Santa Rosa Plain Conservation Strategy,* prepared by USFWS, 2005.

34. *Santa Rosa Plain Conservation Strategy Map*, prepared by USFWS, 2007.

35. *Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021*, prepared by Tetra Tech Consultants for Permit Sonoma, October 2021.

36. *Sonoma County Permit Sonoma GIS*, *Williamson Act Contracts*, Sonoma County, 2019.

37. *Sonoma County Water Agency 2020 Urban Water Management Plan,* prepared by Brown and Caldwell, June 2021.

38. *State Responsibility Area Fire Severity Zone Map*, Office of the State Fire Marshal, June 15, 2023.

39. *Technical Advisory on Evaluating Transportation Impact in CEQA*, prepared by the California Office of Planning and Research, December 2018.

40. *Traffic Impact Study for Cotati Village Community (1)* prepared by W-Trans on June 15, 2023.

41. *USGS Land Cover Classification System*.

42. USFWS *2020 Programmatic Biological Opinion for US Army Corps of Engineers Permitted Projects that Affect the California Tiger Salamander and Three Endangered Plant Species on the Santa Rosa Plain, California* issued on June 11, 2020.

7. ENVIRONMENTAL CONDITIONS OF APPROVAL

The following conditions of approval have been identified through this analysis and ensure implementation of applicable mitigation measures and policies set forth in the 2013 General Plan EIR.

COA AQ-1: During any construction period ground disturbance, the Project will ensure that the Project contractor(s) implement the following measures to control dust and exhaust that are recommended by BAAQMD and listed below:

9. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
10. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
11. 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.
12. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
13. 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.
14. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
15. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
16. Designate a Disturbance Coordinator and post a publicly visible sign with the telephone number of the Disturbance Coordinator to contact regarding dust complaints. The Disturbance Coordinator shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

COA AQ-2: All contractors shall implement a Construction Minimization Plan including all feasible measures to reduce diesel particulate matter emissions as follows:

3. All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for PM (PM10 and PM2.5), if feasible. If Tier 4 equipment is not available for a particular piece of equipment, then use equipment that meets U.S. EPA emission standards for Tier 2 or engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve a 45 percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination).
4. Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 45 percent or greater. Elements of the plan could include a combination of some of the following measures:
    - Installation of electric power lines during early construction phases to avoid use of diesel portable equipment,
    - Use of electrically-powered equipment,

- Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,
- Change in construction build-out plans to lengthen phases, and
- Implementation of different building techniques that result in less diesel equipment usage. Provide line power to the site during the early phases of construction to minimize the use of diesel-powered stationary equipment.

COA BIO-1: In accordance with agency regulations and per the 2020 Programmatic Biological Opinion for the Santa Rosa Plain, vernal pool conservation credits shall be purchased for impacts to suitable Sebastopol meadowfoam habitat at a 1.5:1 ratio. Credits shall be purchased by the applicant and proof of purchase shall be provided to the City prior to the issuance of a grading permit.

COA BIO-2: Prior to issuance of a grading permit, California Tiger Salamander mitigation credits shall be purchased by the applicant from a USFWS approved Conservation Bank at a ratio of 2 square feet of mitigation for every square foot of upland habitat (2:1), and proof of purchase shall be provided to the City.

COA BIO-3: Prior to issuance of a demolition or grading permit (including removal of existing structures and trees), the project biologist shall perform bat roost emergence surveys no more than 7 days prior to the start of activities outside of the hibernation period (November 1 to March 1). Results of the survey shall be provided to the City of Cotati prior to commencing work. If bats are found, a bat exclusion plan shall be prepared and submitted to CDFW to include the following:

d. Bats shall be excluded between March 1 (once overnight low temperatures exceed 45 degrees Fahrenheit) and April 15, or between September 1 and October 15 to ensure no impact to maternity roosting occurs. Once bats have been fully excluded, the structure may be demolished or removed.
e. If a maternity roost is found, a replacement roost must be established either on-site or at a nearby off-site at a permanently protected location in consultation with CDFW.
f. Tree removal for trees greater than 16-inch dbh shall be performed using the three-step removal process. First the crown or upper 1/3 of the tree shall be removed and any limbs removed and left overnight. Next, the rest of the tree shall be felled and left overnight. On the third day, the biologist shall examine the felled tree to make sure any bats have escaped prior to chipping on-site or hauling to an off-site location for disposal.

COA BIO-4: To prevent any potential affects to nesting birds, the following actions shall be taken:

4. If construction begins between February 1 and August 31, a pre-construction nesting bird (both passerine and raptor) survey of the habitats within 500 feet of all work areas shall be performed within 7 days of groundbreaking. If no nesting birds are observed, no further action is required, and grading must occur within one week of the survey to prevent "take" of individual birds that could begin nesting after the survey. A follow-up survey is required if a stoppage in work occurs for longer than 7 days between February 1 and July 1.
5. If active bird nests (passerine and/or raptor) are observed during the pre-construction survey, a disturbance-free buffer zone shall be established around the

nest tree(s) until the young have fledged or the nest has naturally failed or been predated, as determined by a qualified biologist. The radius of the required buffer zone can vary depending on the species, with the dimension of any required buffer zone to be determined by a qualified biologist.

6. To delineate the "no-work" buffer zone around a nesting tree, orange construction fencing must be placed at the specified radius from the base of the tree within which no construction related activity or machinery shall intrude.

COA BIO-5: Prior to issuance of a demolition, grading, or building permit, credits from a US Army Corps of Engineers- and Regional Water Quality Control Board-approved wetland mitigation bank shall be purchased by the applicant at a ratio of no less than 1:1 to compensate for the loss of waters of the U.S. and State, and proof of credits shall be provided to the City of Cotati.

COA BIO-6: Tree removal or unintentionally damaged trees shall be replaced in compliance with Chapter 17.54 Tree Protection ordinance. All contractors shall comply with and implement the Tree Protection measures established in the Planning Division's Project Conditions of Approval, specifically Conditions 7E and 11.

COA BIO-7: Rare plant surveys shall be conducted annually by a qualified biologist during appropriately timed blooming periods until construction commences on the project site. Results of rare plant surveys shall be submitted to the City prior to issuance of grading permit.

COA BIO-8: Indirect impacts to adjacent, offsite waters of the U.S./State shall be minimized to the maximum extent practicable by the use of best management practices (BMPs) that are installed prior to earth-work to protect waters of the U.S./State outside of the designated work areas. These practices shall include installing orange construction fencing, silt fencing, wildlife friendly hay wattles (that is, no monofilament netting), gravel wattles, and other protective measures between project activities and preserved offsite waters of the U.S./State. Orange construction fencing and other appropriate BMPs shall be installed along the riparian area located along the western boundary of the project site and the onsite construction areas. If the drainage ditch along SR-116 is to be preserved, orange construction fencing and other appropriate BMPs shall be installed during earthwork for all on and offsite improvements.

COA CUL-1: In the event that cultural resources, human remains, or unique paleontological resources are inadvertently discovered during ground disturbing activities, the following conditions shall apply:

d. 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.

e. 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.

- If the skeletal remains are found to be prehistoric, Native American and not modern, then the coroner must call the Native American Heritage Commission in Sacramento that will designate the "Most Likely Descendant" (or MLD) of the discovered remains. The MLD will be responsible for recommending the disposition and treatment of the remains (before construction is resumed). Although the likelihood of encountering human skeletal remains in the project area seems slight, it is important to have a procedure for alternate tasks that can be put into effect quickly in the event that human remains are discovered. This allows for work to continue elsewhere on the project area (where appropriate given the size of the property and location of the discovery) while the remains are properly investigated.

f. If any prehistoric artifactual materials such as modified obsidian flakes or formed tools or concentrations of natural obsidian nodules are observed during any phase of grading or future construction on the property, all work in the vicinity of the find shall be stopped until the area of the discovery can be evaluated by an archaeologist. Depending on the extent and cultural composition of the discovered materials, subsequent excavation monitored by an archaeologist may be required, who shall be ready to record, recover and/or protect significant artifactual materials from further damage.

COA CUL-2: Prior to any ground disturbing activities, a Secretary of the Interior qualified archaeologist shall prepare an Archaeological Monitoring Plan (AMP) and provide the appropriate level of archaeological monitoring of ground-disturbing activities in the area shown on Figure 21 (pg. 34) of the Cultural Resources Study prepared by Evans and De Shazo on May 31, 2024. The AMP shall include the following provisions:

1. A pre-construction Cultural Resources Awareness Training (CRAT) and details regarding the types of archaeological resources that could be found within the Project Area, and the procedures to follow should any archaeological material be encountered, including proper notification to Tribes, agencies, and stakeholders, and for an assessment of the significance of any archaeological resources encountered during construction shall be provided.
2. The archaeological monitor shall be empowered to halt construction activities at the location of a discovery to review possible archaeological material and to protect the resource while the find is being assessed.
3. Monitoring shall continue until the Secretary of Interior-qualified archaeologist determines that full time monitoring of specific excavation activities or in specific areas of the Project can be reduced to spot check monitoring or that monitoring is no longer warranted.
4. A report shall also be prepared by the monitor that documents findings after the ground disturbance is complete and submitted to the City.

COA GEO-1: Prior to issuance of a grading or building permit, the applicant shall submit a geotechnical investigation report for review and acceptance by the Chief Building Official and/or the City Engineer. The report shall include design-level recommendations, which shall be incorporated into the final project plans.

a. At the time of permit application submittal, the applicant shall include a letter, together with the geotechnical analyses, from the Project's geotechnical engineer certifying that all recommendations in the Project's geotechnical analyses meet current geotechnical design standards and that all applicable recommendations have been incorporated into the construction plans. Where the geotechnical engineer recommends technical changes to the recommendations in any of the geotechnical analyses, such changes shall be clearly identified in the letter.

b. The Project's geotechnical engineer shall inspect the construction work and shall certify to the City, prior to issuance of a certificate of occupancy, that the improvements have been constructed in accordance with the geotechnical analyses.

COA GHG-1: The applicant shall submit final plans that include electric vehicle charging infrastructure in compliance with CalGreen Tier 2 Voluntary Measures. Plans shall be reviewed and confirmed for compliance by the City of Cotati Building Department prior to issuance of an occupancy permit.

COA HYD-1: Prior to issuance of a building permit, the applicant shall submit a Storm Water Prevention and Pollution Plan (SWPPP) and erosion and sediment control plan for approval by the City Engineer. The SWPPP shall include Best Management Practices to be implemented during grading and construction activities. The SWPPP shall incorporate the requirements of all applicable federal, state, and local regulations. Submitted plans shall also demonstrate compliance with City of Cotati Municipal Code Chapter 13.68 Storm Water Ordinance and Chapter 14.36 Erosion and Sediment Control.

COA HYD-2: Prior to issuance of a grading permit, the applicant shall submit a final Stormwater Control Plans (SCP) including a final Storm Water Low Impact Development Plan (FSWLID) and Stormwater Mitigation Plan for review and approval by the City Engineer.

COA NOI-1: Prior to issuance of the building permit, the applicant shall submit final design plans that incorporate and certify the inclusion of mechanical ventilation equipment for all apartments located in Buildings A and B with a clear view of traffic on SR-116. The mechanical ventilation shall supply fresh air via an acoustically rated straight air transfer duct such as the Fresh 80, 90 or 100-dB units by Fresh Ventilation or an equivalent unit or other system deemed satisfactory by the local building official, to provide adequate fresh air to the residences with closed windows to maintain interior noise levels at or below 45 dBA Ldn.

COA NOI-2: The Project shall implement best management practices to minimize construction-related noise impacts as set forth in Action N1h of the General Plan, as listed below, and shall meet all applicable noise standards as set forth in Section 17.30.050 of the Cotati Municipal Code:

9. 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. No construction shall occur on Sundays or holidays.
10. All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
11. The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.

12. 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.
13. Unnecessary idling of internal combustion engines shall be prohibited.
14. 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.
15. Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing.
16. 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.

COA REC-1: Prior to issuance of the building permit, the applicant shall dedicate one acre of parkland per 200 residents or pay an in-lieu fee as determined by the Community Development Director.

COA TRA-1: The Applicant shall provide public improvement plans to the City for review and acceptance prior to issuance of a grading permit. The final plans shall include signalization at either the intersection of Alder Avenue/SR-116 or the signalization of W. Cotati Ave/SR-116. If no signal is installed at Alder Avenue, final improvement plans shall include a physical barrier designed in compliance with Caltrans Highway Design Manual to prevent left turns from Alder Avenue onto SR-116 and shall also include a public access easement to allow vehicles to use Batchelor Lane (through Cotati Village 1). A memo from the Project's traffic engineer confirming that the final plans are designed to achieve intersection operation at Level of Service D or greater. The final plans shall be reviewed and accepted by the City's Engineer prior to issuance of a grading permit and shall be fully installed prior to issuance of a certificate of occupancy for the project.

COA TRA-2: The applicant shall improve the bus stop located west of the SR-116 and Alder Ave. intersection to meet Sonoma County Transit Requirements and shall include a shelter, a bench, and ADA access to the proposed multi-use pathway along SR-116 as well as any other elements required by Sonoma County Transit Authority. The bus stop may be relocated east of Alder Avenue if a signal is installed at W. Cotati/SR-116 intersection and not at the Alder Avenue/SR-116 intersection.

COA TRA-3: The Project shall comply with all requirements from Caltrans to address design, engineering, and operation requirements within the State right-of-way. Prior to commencing any work in the public right of way, the applicant shall secure an encroachment permit from Caltrans and provide the following to Caltrans:

1. Detailed information regarding any connections and or modifications to State drainage systems must be provided.
2. Any engineering calculations for onsite systems out-letting to State drainage systems (pipe or ditch) must be provided, such as flow rates for shed areas, detention time for detention basins,

etc. If additional runoff is generated from the site and drains towards SR-116, the runoff must be metered to pre-construction levels.

The applicant shall provide a copy of the approved encroachment permit to the City prior to commencing work within the public right of way. If Project work requires the movement of oversized or excessive load vehicles on State roadways, the Applicant shall secure a transportation permit from Caltrans and provide a copy to the City.

COA TRA-4: The Applicant shall install a 50-foot-long left-turn pocket on SR-116 at the eastbound approach to Alder Avenue, or as otherwise approved by the City Engineer. If signalized, the southbound Alder Avenue approach to SR-116 shall be restriped to include a separate left-turn lane. The left-turn lane and restriping plan shall be submitted to the City Engineer for review and approval prior to building permit issuance. All required approvals shall be obtained from Caltrans and submitted to the City.

COA TRA-5: Final landscaping plans shall be submitted and show compliance with Cotati Municipal Code (CMC) Section 17.30.040(c)(2). Final landscaping plans shall include the specific plants that will be placed in the traffic safety visibility area (see CMC Section 17.30.040.E) and their maximum projected height which shall be no taller than 36 inches except for trees with their canopy trimmed to a minimum of eight feet above grade. These standards shall be applied to access drive from Alder Avenue, as well as the intersections of the multi-use path and Alder Avenue.

COA UTI-1: The final plans and a final Water and Wastewater Assessment Report shall be submitted by the Applicant and reviewed/accepted by the City Engineer to confirm water demand and wastewater generation of final project design can be met by utilities prior to permit issuance.

COA UTI-2: The applicant shall submit landscape and irrigation plans for plantings at the time of the Improvement Plan submittal package. All landscaping and irrigation shall comply with the City Water Efficient Landscape Ordinance (WELO) and is subject to review and approval by the City Engineer. Prior to issuance of a certificate of occupancy, all plantings and irrigation systems in the approved final landscaping plan shall be completed.

COA UTI -3: The applicant shall execute a City standard Public Improvement Agreement to address the proposed public improvements. The agreement shall address design, construction, dedication of, and City acceptance of the public improvements. The agreement shall include and engineer's cost estimate for the public improvements, security for the completion of these improvements, an initial deposit and execution of the City's deposit account agreement for City inspection of the construction of the public improvements. The agreement shall be submitted for review and approval by the City. The agreement shall also address the ownership, maintenance, lighting, parking, access and shall be recorded against the lands of the project. The site shall be annexed into the Community Facilities District.

COA MF-1: The applicant shall coordinate the project's construction activities and construction schedule with the City to coordinate the concurrent construction of projects within 1,000 feet of the project site to ensure that overlapping lane closures, periods of increased noise and dust generation are minimized to the extent practicable.