

Sonoma County Government Center Project

Draft Environmental Impact Report

prepared for

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None.

Executive Summary

This section summarizes the characteristics, alternatives, as well as the environmental impacts and mitigation measures associated with the County Administration Center Redevelopment Project (proposed project).

Project Synopsis

Project Applicant

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Lead Agency Contact Person

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Project Location

The proposed project would occur at the existing County Administration Center (CAC) campus in the City of Santa Rosa on Sonoma County Assessor's Parcel Number (APN) 180-030-012. The project site is bounded by Bicentennial Way to the north, Steele Lane to the south, Mendocino Avenue to the east, and U.S. Highway 101 (Highway 101) to the west. The project site includes the existing office campus north and east of Administration Drive and west of Ventura Avenue (office site), as well as the area east of Ventura Avenue and north of Administration Drive intended for residential and retail/commercial development (residential site).

The site is located within an urbanized area and is currently developed with County government office buildings, surface parking lots, and associated infrastructure. The project site is regionally accessible from Highway 101 and locally accessible from Administration Drive, Ventura Avenue, County Center Drive, Professional Drive, and Mendocino Avenue. Surrounding uses include government offices, commercial development, parking areas, and residential uses.

Project Description

This EIR has been prepared to evaluate the potential environmental effects of the Sonoma County Government Center Project. The following is a summary of the full project description, which is provided in Chapter 2, *Project Description*.

The proposed project would redevelop portions of the existing Sonoma County Administration Center (CAC) campus in the City of Santa Rosa. The project includes an office component on County-owned property located north and east of Administration Drive and west of Ventura Avenue, as well as a residential and retail/commercial component on property located east of Ventura Avenue.

The developed urban site is currently occupied by multiple County government office buildings, surface parking areas, internal roadways, and utility infrastructure. Existing buildings on the CAC campus include the Administration Building, Fiscal Building, Permit Sonoma Building, Human Services Building, and Law Library/Registrar of Voters Building, several of which were originally constructed in the 1950s. The project site is surrounded by government offices, commercial development, roadways, and residential uses.

The proposed project would involve demolition of five existing County buildings totaling approximately 185,500 square feet and redevelopment of the site with a new consolidated County government campus and mixed-use residential development. The office component of the project would include construction of an approximately 250,000-square-foot office building up to five stories in height and a 7,000- to 13,000-square-foot Emergency Coordination Center (ECC). The office building would accommodate up to approximately 1,200 employees and include a Board of Supervisors chamber. The proposed office building would be five stories.

The residential site would include development of up to 1,500 residential units and approximately 20,000 square feet of retail/commercial uses. The retail/commercial uses would accommodate up to approximately 32 employees during operation. Residential buildings would reach a maximum height of seven stories. The residential site is intended to support implementation of Program 4c of the Sonoma County Housing Element, including development of affordable housing opportunities for County employees and lower-income households.

The proposed project would include approximately 1,050 surface parking spaces beneath a one-megawatt solar microgrid with battery storage capability. Additional project features would include pedestrian connections, common open space, stormwater treatment facilities, utility infrastructure improvements, and stormwater design features consistent with the County's Municipal Separate Storm Sewer System (MS4) permit requirements.

Construction could begin as early as 2027 and would occur in phases to minimize disruption to ongoing County operations. Full buildout of the residential and retail/commercial components is anticipated by approximately 2031.

Project Objectives

The following are objectives of the proposed project:

- Design and construct a new County Administration Center to use County resources more efficiently;
- Provide housing opportunities for County employees;
- Provide housing opportunities for a variety of income levels, with an emphasis on affordable housing opportunities for low and very low-income households;

- Provide housing consistent with Program 4c in the County's adopted Housing Element;
- Provide housing near jobs, transit, services, schools, and community-serving retail and/or commercial establishments;
- Provide access to public transportation and SMART from County Administration Center;
- Implement goals, objectives, and policies of the Sonoma County General Plan focused on growth in established Urban Service Areas; and
- Modernize and improve workplace accessibility, seismic safety, and efficiency.

Required Discretionary Approvals

The County of Sonoma will need to take the following discretionary actions in conjunction with the proposed project:

- Certification of the EIR
- Adoption of the EIR Findings and Statement of Overriding Considerations
- Adoption of a Mitigation, Monitoring, and Reporting Program in conjunction with the EIR
- Approval of the Sonoma County Government Center Project
- Demolition, grading, and building permits from PRMD

In addition, approvals that may be required by other agencies include:

- **City of Santa Rosa** – Issuance of a Will Serve letter for utility connections.
- **California Department of Fish and Wildlife** – Fish and Game Code Section 1602 Agreement for work proposed in the California Department of Fish and Wildlife jurisdictional area, if needed.
- **United States Army Corps of Engineers** – Clean Water Act Section 404 permit for work proposed in the United States Army Corps of Engineers jurisdictional area, if needed.
- **North Coast Regional Water Quality Control Board** – Clean Water Act Section 401 permit for work proposed in the North Coast Regional Water Quality Control Board jurisdictional area, if needed.

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the proposed project. Studied alternatives include the following two alternatives. Based on the alternatives analysis, Alternative 4 was determined to be the environmentally superior alternative.

- Alternative 1: No Project
- Alternative 2: 200 Unit Buildout
- Alternative 3: 650 Unit Buildout
- Alternative 4: Retention of the Administration Building

CEQA requires that an environmentally superior alternative be identified among those analyzed. It further states that if the No Project Alternative is identified as environmentally superior, the next most environmentally superior alternative must also be identified. While Alternative 2 would result in the greatest overall reduction in environmental impacts, Alternative 4 is identified as the Environmentally Superior Alternative among the build alternatives because it avoids the project's significant and unavoidable impact to cultural resources, thereby providing an important

environmental benefit that outweighs the incremental increases in other, less-than-significant impact areas. Refer to Section 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify any areas of known controversy for the proposed project. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the County are summarized in Section 1.0, *Introduction*.

Issues to be Resolved

The proposed project would result in significant and unavoidable impacts to aesthetics and cultural resources. Additionally, the proposed project requires mitigation measures AES-1, AES-2, AQ-1, AQ-2, BIO-1, CUL-1a, CUL-1b, CUL-2a, CUL-2b, GEO-1, GHG-1, HAZ-1, NOI-1, TCR-1, and TCR-2 to avoid and reduce potential impacts to aesthetics, air quality, biological resources, cultural resources, geological resources, hazards and hazardous materials, noise, and tribal cultural resources.

This EIR presents three potential project alternatives intended to reduce the potential environmental impacts of the proposed project. The No Project Alternative would reduce overall development but would not include updated CAC and, as a result, would not meet the overall project objectives. Alternative 2 and Alternative 3 would result in impacts generally similar in type but reduced in magnitude as compared to the proposed project and would not avoid the significant and unavoidable impacts to aesthetics of cultural resources. Similarly, Alternative 4 would also result in impacts generally similar to the proposed project but would avoid the significant and unavoidable impacts to cultural resources. Overall, none of the alternatives would eliminate all significant impacts, and decision-makers must weigh the project's benefits against the remaining impacts.

Issues Not Studied in Detail in the EIR

Section 1.3 summarizes issues from the environmental checklist that were addressed in this EIR. There is no substantial evidence that significant impacts would occur to the following issue areas: Agricultural Resources, Mineral Resources, and Population and Housing.

Summary of Impacts and Mitigation Measures

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

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.

- **Less than Significant.** An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

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

Impact	Mitigation Measure (s)	Residual Impact
Aesthetics		
Impact AES-1. The project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.	No mitigation is required	Less than significant
Impact AES-2. The project site is not located within a designated state scenic highway. Therefore, no impact would occur.	No mitigation is required	No impact
Impact AES-3. The project would not conflict with applicable zoning and other regulations governing scenic quality, but may result in potentially significant impacts related to visual character as defined by the County's Visual Assessment Guidelines. Impacts associated with the office site would be less than significant with implementation of Mitigation Measure AES-1. However, even with implementation of Mitigation Measure AES-1, it is conservatively assumed that impacts associated with the residential site would remain significant and unavoidable.	**AES-1. Context-Sensitive Design.** The proposed office and the residential development shall be designed to maximize visual compatibility with surrounding land uses through context-sensitive massing, appropriate setbacks, and architectural articulation (e.g., varied rooflines, recessed façades, balconies, and material changes) that add texture and depth to publicly visible elevations. The design shall avoid large, unbroken wall planes facing public streets or open spaces. To soften the visual impact of new structures, the proposed development shall incorporate perimeter setbacks, landscaping, and streetscape amenities (e.g., pedestrian-scale lighting, seating, and shade trees). Building placement and height shall be configured to preserve and frame public views of scenic features, where feasible. All exterior building materials, including glass and metal panels, shall have low reflectivity finishes (e.g., matte or textured surfaces, non-mirrored glass). Glazing shall incorporate low-emissivity (low-e) coatings or fritted glass to reduce solar reflectance, to the extent feasible. A visual analysis shall be submitted to the Permit Sonoma Natural Resources Division with the final design package to demonstrate compliance with the Sonoma County Visual Assessment Guidelines.	Less than significant with mitigation incorporated for the office component; significant and unavoidable for the residential component
Impact AES-4. The office site would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area with implementation of Mitigation Measures AES-1 and AES-2. However, light and glare impacts resulting from the residential site would remain significant and unavoidable.	**AES-1. Context-Sensitive Design.** *See above* **AES-2. Lighting Design and Glare Minimization**. Lighting for the proposed development shall be designed to utilize energy-efficient fixtures/lamps, such as high pressure sodium, hard-wired compact fluorescent, or other lighting technology that is of equal or greater energy efficiency. For safety and security, during business hours, all commercial areas shall be equipped with a lighting device providing a minimum one-foot candle of light at ground level during the hours of darkness. Lighting fixtures shall be shielded or recessed to reduce light trespass to adjoining properties, by: 1. Ensuring that the light source (e.g., bulb, etc.) is not visible from off the site; and	Less than significant with mitigation incorporated for the office component; significant and unavoidable for the residential component

Impact	Mitigation Measure (s)	Residual Impact
	2. Confining glare and reflections within the boundaries of the site to the maximum extent feasible. Each light fixture shall be directed downward and away from adjoining properties and public rights-of-way, so that no on-site light fixture directly illuminates an area off the site. No permanently installed lighting shall blink, flash, or be of unusually high intensity or brightness. Fixtures shall be controlled by timers or motion sensors to reduce unnecessary nighttime lighting, to the extent feasible.	
Impact AES-C-1. Development in the cumulative impact analysis area could affect public views and scenic character. However, cumulative impacts to scenic vistas would be less than significant, and the contribution of the project would not be cumulatively considerable.	No mitigation is required**.**	Less than significant
Air Quality		
Impact AQ-1. The project would not conflict with or obstruct implementation of the 2017 Clean Air Plan with implementation of mitigation measures. Impacts would be less than significant with mitigation incorporated.	**AQ-1. Operational Emissions Reduction.** Prior to issuance of a certificate of occupancy, the following measures shall be incorporated into the project design and noted on all building and landscape maintenance plans: ▪ All interior and exterior paints, coatings, primers, and sealants used for the proposed project shall be zero-VOC with a maximum VOC concentration of 5 g/L to reduce VOC emissions. Documentation verifying VOC content shall be maintained and made available upon request. ▪ All janitorial and facility maintenance activities shall utilize zero or low-VOC cleaning supplies. These requirements shall be incorporated into building operations and maintenance procedures and included in janitorial service contracts. ▪ All landscape maintenance equipment utilized for ongoing operation of the project shall be electric-powered or battery-operated. The use of gasoline-powered landscaping equipment shall be prohibited for routine landscape maintenance activities including, but not limited to, lawn mowers, weed whackers, and leaf blowers. These requirements shall be incorporated into the project's operational policies and any applicable service contracts. Documentation demonstrating compliance with these requirements shall be made available upon request.	Less than significant with mitigation incorporated

Impact	Mitigation Measure (s)	Residual Impact
Impact AQ-2. Project construction and operation would result in a cumulatively considerable net increase for ROG, which the project region is in non-attainment under an applicable federal or state ambient air quality standard. However, with mitigation incorporated, impacts would be less than significant.	**AQ-2. Construction Fugitive Dust Reduction.** The general contractor(s) for the proposed project shall implement the following measures to reduce fugitive dust emissions from construction per the Air District's guidelines for Basic Best Management Practices for Construction-Related Fugitive Dust Emissions: ▪ All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. ▪ All haul trucks transporting soil, sand, or other loose material off-site shall be covered. ▪ All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. ▪ All vehicle speeds on unpaved roads shall be limited to 15 mph. ▪ 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. ▪ All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. ▪ All trucks and equipment, including their tires, shall be washed off prior to leaving the site. ▪ Unpaved roads providing access to sites located 100 feet or further from a paved road shall be ▪ treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. ▪ Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations. These requirements shall be incorporated into the project's construction policies and any applicable service contracts. Documentation demonstrating compliance with these requirements shall be made available upon request.	Less than significant with mitigation incorporated

Impact	Mitigation Measure (s)	Residual Impact
Impact AQ-3. The project would not increase carbon monoxide concentrations such that it would create carbon monoxide hotspots, and construction of the project would not result in emissions of TACs sufficient to exceed applicable health risk criteria. The project would involve the siting of a permitted stationary source of TACs; however, this would not result in nearby sensitive receptors being exposed to health risks in excess of Air District thresholds. impacts would be less than significant.	No mitigation required	Less than significant
Impact AQ-4. The project would not generate odors adversely affecting a substantial number of people during construction or operation. Impacts would be less than significant.	No mitigation required	Less than significant
Biological Resources		
Impact BIO-1. The project would not have a substantial adverse effect on special-status plant or wildlife species. However, the project could result in adverse effects to nesting birds directly through nest destruction or construction related disturbance. Impacts would be less than significant with mitigation.	**BIO-1. Nesting Bird Survey.** If construction requires vegetation trimming or tree removals that are scheduled to occur during the nesting bird season (February 1 through August 31), the County shall retain a qualified biologist to conduct a pre-construction nesting bird survey no more than 14 days prior to the start of construction to determine the presence/absence of nesting birds and raptors within the project site and adjacent areas. The survey shall include the entire site plus a 100-foot buffer, as accessible. If active nests are found, the qualified biologist shall establish an appropriate avoidance buffer, considering the species sensitivity and physical location of the nest (line of site to the work area), to comply with CFGC sections 3503 and 3503.5. In no case shall the buffer be smaller than 50 feet for non-raptor bird species and 250 feet for raptor species. The buffer distance shall be determined in consultation with CDFW. To prevent encroachment, the established buffer(s) shall be clearly marked by high visibility material installed by the contractor. The established buffer(s) shall remain in effect until the young have fledged or the nest has been abandoned as confirmed by the qualified biologist. The County shall review and approve the biologists' findings and buffer during construction as appropriate.	Less than significant with mitigation incorporated
Impact BIO-2. The project would not have adverse effects on any sensitive natural community. This impact would be less than significant.	No mitigation required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact BIO-3. The project would not have a substantial adverse effect on state or federally protected wetlands. Impacts would be less than significant.	No mitigation required	Less than significant
Impact BIO-4. The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery site. There would be no impact.	No mitigation required	No impact
Impact BIO-5. The project would not conflict with any applicable local policies or ordinances protecting biological resources. No impact would occur.	No mitigation required	No impact
Impact BIO-6. The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There would be no impact.	No mitigation required	No impact
Cultural Resources		
Impact CUL-1. The office site of the proposed project would demolish the Administration Building, which was recommended eligible for listing in the NRHP and CRHR in the attached Cultural Resources Technical Report and considered a historical resource. Due to the demolition of a historical resource, impacts to historical resources associated with the office site would be significant and unavoidable, even with implementation of Mitigation Measures CUL-1a and CUL-1b. Impacts associated with the residential site would result in no impact to historical resources.	**CU-1a. Building Recordation.** Archival documentation of as-built and as-found conditions shall be prepared for the Administration Building, prior to demolition. Prior to issuance of demolition permits, the County of Sonoma shall ensure that documentation of the building proposed for demolition is completed and follows the general guidelines of Historic American Building Survey (HABS)-level II documentation. The documentation shall include high resolution large-format and digital photographic recordation, a historic narrative report, compilation of historic research, and copies of historical architectural plans of the building (if available). The documentation shall be completed by a qualified professional who meets the standards for history, architectural history, or architecture as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The original archival-quality documentation shall be offered as donated material to the Sonoma County Public Library to make it available for current and future generations. Archival copies of the documentation also would be retained by the County of Sonoma and the Northwest Information Center where it would be available to local researchers. **CUL-1b. Interpretive Display.** Impacts resulting from the demolition of the Administration Building at 575 Administration Drive shall be minimized through the	Significant and unavoidable for the office site; no impact for the residential site

Impact	Mitigation Measure (s)	Residual Impact
	installation of a high-quality, on-site interpretive display in a publicly accessible location within the pProject site, ideally on a site corresponding to the Administration Building's footprint. The display shall provide context on the CAC's historical development and focus on the Administration Building's role as a Modern civic building, as well as the building's Modern architectural design and association with local master architect J. Clarence Felciano. The interpretive display shall be overseen by a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) for Historian or Architectural Historian. historic information contained in Rincon's Cultural Resources Technical Report and District Record for the Sonoma County Administrative Center, and individual DPR Form set for the Administration Building can serve as the basis for the interpretive display. The goal of the interpretive display would be to educate the public about the Administration Building's history and architectural significance. The content of the display should be approved by the County of Sonoma Planning Division or designee. The display should be installed before the proposed project is complete and receives a certificate of occupancy.	
Impact CUL-2. Although the proposed project would not cause a substantial adverse change in the significance of a known archaeological resource pursuant to Section 15064.5, construction of the proposed project would involve ground disturbing activities that may have the potential to adversely impact previously unidentified archaeological resources. Impacts would be less than significant with incorporation of mitigation measures.	**CUL-2a. Preconstruction Cultural Resources Sensitivity Training,** Prior to the start of project-related ground disturbing activities, a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology (36 CFR Part 61) shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an unanticipated discovery of archaeological resources or human remains. The County shall ensure that construction personnel attend the training and retain documentation demonstrating attendance. **CUL-2b. Inadvertent Discovery of Archaeological Resources.** In the event that archaeological resources are inadvertently encountered during ground-disturbing activities, work in a 50-foot radius of the find shall be halted and redirected, and the Qualified Archaeologist shall be contacted immediately. The Qualified Archaeologist or other designated archaeologist working under the direction of the Qualified Archaeologist shall provide recommendations regarding the resource's potential significance and potential treatment in coordination with the County. If the resource is determined by the Qualified Archaeologist to be indigenous in origin, then a Native American representative shall also be contacted to participate in the evaluation of the resource. Avoidance and preservation in place shall be the preferred manner of mitigating impacts to archaeological resources. If the Qualified Archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	for the CRHR and significant impacts to the resource cannot be avoided via project redesign, the Qualified Archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, pursuant to the requirements of the CEQA Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts related to the resource. Pursuant to the data recovery plan, the Qualified Archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The Countyity shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, pursuant to CEQA Guidelines Section 15126.4(b)(3)(C).	
Impact CUL-3. Construction of the proposed project would involve ground-disturbing activities that may have the potential to adversely impact previously unidentified human remains. The proposed project would comply with California Health and Safety Code Section 7050.5, which would ensure impacts to human remains are less than significant.	No mitigation required	Less than significant
Impact CUL-C-1. Development in the cumulative impact analysis area could adversely affect historical resources. Cumulative impacts to historical resources would be significant and unavoidable, and the contribution of the project would be cumulatively considerable.	**Mitigation Measures CUL-1a and CUL-1b**	Significant and unavoidable
Energy		
Impact E-1. Construction and operation of the proposed project would result in the consumption of gasoline, diesel, and electricity; however, the proposed project would incorporate design features required by the most current Title 24 standards. therefore, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. This impact would be less than significant.	No mitigation required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact E-2. The proposed project would consume energy but would not conflict with the County of Sonoma Climate Plan, County of Sonoma General Plan, and ABAG's Plan Bay Area 2050. Therefore, impacts would be less than significant.	No mitigation required	Less than significant
Geology and Soils		
Impact GEO-1. The project is not within an Alquist-Priolo Fault Zone. Further, the proposed project would not directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault. Impacts would be less than significant.	No mitigation required	Less than significant
Impact GEO-2. The proposed project would directly or indirectly cause potential substantial adverse effects including the risk of loss, injury, or death involving strong seismic ground shaking and ground failure, including liquefaction. Impacts would be less than significant with implementation of mitigation.	**GEO-1. Incorporation of Geotechnical Investigation Prior to Grading Activities**. A geotechnical investigation or investigations shall be prepared for the office site and residential site pursuant to section 1803.5.11 of the California Building Code. For example, a geotechnical investigation could be prepared for the entire site, or separate investigations may be prepared for the office site and the residential site. In no case shall site grading commence in an area where no geotechnical investigation has been prepared and provided to the County. Prior to issuance of a grading permit, all recommendations included in the geotechnical investigation or investigations shall be incorporated into the project design by inclusion on the construction/civil plan set. For example, the grading plan and building plan sets shall contain the recommendations provided in the geotechnical investigation.	Less than significant with mitigation incorporated
Impact GEO-3. The project area is not located in an area with landslide potential. The project would not directly or indirectly cause potential substantial adverse effects related to landslides, and no impact would occur.	No mitigation required	No impact
Impact GEO-4. The proposed project would not result in substantial soil erosion or loss of topsoil. Construction of the proposed project would include ground disturbance such as excavation and grading that would result in loose or exposed soil. This disturbed soil could be eroded by wind or during a storm event, which would result in the loss of topsoil. Adherence to	No mitigation required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
existing permit requirements and county regulations would ensure this impact is less than significant.		
Impact GEO-5. Construction and occupancy of development facilitated by the proposed project could be located on geologic units and soils that are unstable, resulting in landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant with implementation of mitigation.	**GEO-1. Incorporation of Geotechnical Investigation Prior to Grading Activities**.	Less than significant with mitigation incorporated
Impact GEO-6. Development facilitated by the project has the potential to be located on expansive soils, which would create substantial risks of life or property should structural damage result from shrink-swell clays. Impacts would be less than significant with implementation of mitigation.	**GEO-1. Incorporation of Geotechnical Investigation Prior to Grading Activities**.	Less than significant with mitigation incorporated
Impact GEO-7. The project would not involve septic tanks or alterative wastewater disposal systems. There would be no impact.	No mitigation required	No impact
Impact GEO-8. The potential for unique paleontological resources at the project site is low. Impacts would be less than significant.	No mitigation required	Less than significant
Greenhouse Gas Emissions		
Impact GHG-1. The proposed project would generate temporary and long-term increases in GHG emissions, but the proposed project would be consistent with the Air District's 2022 CEQA Greenhouse Gas Guidelines and the Sonoma Climate Mobilization Strategy with the implementation of Mitigation Measure GHG-1. This impact would be less than significant with mitigation.	**GHG-1. Greenhouse Gas Emissions Reductions.** The County shall verify prior to issues a building permit that the project shall incorporate the following GHG emissions reduction action to demonstrate consistency with the Air District's GHG CEQA thresholds and the Sonoma Climate Mobilization Strategy: ▪ Provide EV charging infrastructure that, at minimum, meets California Green Building Standards Code Tier 2 voluntary measures at the time of project approval.	Less than significant with mitigation incorporated
Impact GHG-2. the proposed project would be consistent with the County of Sonoma Climate Plan and the Sonoma Climate Mobilization Strategy with implementation of Mitigation Measure GHG-1. This impact would be less than significant with mitigation.	No mitigation required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Hazards and Hazardous Materials		
Impact HAZ-1. The proposed project would not involve the routine transport, use, or disposal of substantial amounts of hazardous substances. Impacts would be less than significant.	No mitigation required	Less than significant
Impact HAZ-2. Operation of the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. However, demolition activities would create a significant hazard. Impacts would be less than significant with implementation of mitigation.	**HAZ-1. Project Demolition Activities.** In conformance with State and local laws, a visual inspection/pre-demolition survey, and possible sampling, shall be conducted prior to the demolition of on-site building(s) to identify asbestos-containing materials (ACMs) and lead-based paint. Documentation of the survey shall be provided to the County prior to commencement of demolition activities. During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Title 8, CCR, section 1532.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the type of lead being disposed. All potentially friable asbestos containing materials shall be removed in accordance with National Emission Standards for Air Pollution (NESHAP) guidelines prior to demolition or renovation activities that may disturb ACMs. All demolition activities shall be undertaken in accordance with Cal/OSHA standards contained in Title 8, CCR, section 1529, to protect workers from asbestos exposure. A registered asbestos abatement contractor shall be retained to remove and dispose of asbestos-containing materials identified in the asbestos survey performed for the site in accordance with the standards stated above in this mitigation measure. Materials containing more than one-percent asbestos are also subject to Bay Area Air District (BAAQMD) regulations. Removal of materials containing more than one-percent asbestos shall be completed in accordance with BAAQMD requirements and notifications. Based on Cal/OSHA rules and regulations, the following actions shall be implemented to limit impacts to construction workers: ▪ Prior to commencement of demolition activities, a building survey, including sampling and testing, shall be completed to identify and quantify building materials containing lead-based paint. ▪ During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR, section 1532.1, including employee training, employee air monitoring and dust control.	Less than significant with mitigation incorporated

Impact	Mitigation Measure (s)	Residual Impact
	▪ Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the type of waste being disposed.	
Impact HAZ-3. Development facilitated by the project could result in hazardous emissions or handling of hazardous or acutely hazardous materials, substances or waste within 0.25 mile of an existing or proposed school. However, compliance with existing regulatory requirements would minimize risks to schools and their occupants, resulting in a less than significant impact.	No mitigation required	Less than significant
Impact HAZ-4. Development facilitated by the project would not result in development on sites listed pursuant to government code section 65962.5. As such, the proposed project would have no impact.	No mitigation required	No impact
Impact HAZ-5. Development facilitated by the project would not be located within an airport land use plan or within two miles of a public airport and people residing or working in the plan area would not be exposed to airport safety hazards or excessive noise. No impact would occur.	No mitigation required	No impact
Hydrology and Water Quality		
Impact HYD-1. The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. This impact would be less than significant.	No mitigation required	Less than significant
Impact HYD-2. The proposed project would not substantially decrease infiltration rates on-site. The proposed project would be supplied water by the City of Santa Rosa in accordance with the management requirements of the Santa Rosa Valley – Santa Rosa Plain subbasin. This impact would be less than significant.	No mitigation required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact HYD-3. Construction and operation of the proposed project would not substantially alter the existing drainage pattern of the site in a manner which would result in substantial erosion or siltation on- or off-site. This impact would be less than significant.	No mitigation required	Less than significant
Impact HYD-4. Construction and operation of the proposed project would not substantially alter the existing drainage pattern of the site in a manner which would result in flooding on- or off-site. This impact would be less than significant.	No mitigation required	Less than significant
Impact HYD-5. Construction and operation of the proposed project would not substantially alter the existing drainage pattern of the site in a manner which would exceed the capacity of stormwater drainage systems or provide additional sources of polluted runoff. This impact would be less than significant.	No mitigation required	Less than significant
Impact HYD-6. The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flow. No impact would occur.	No mitigation required	No impact
Impact HYD-7. The proposed project would not risk the release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. This impact would be less than significant.	No mitigation required	Less than significant
Impact HYD-8. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This impact would be less than significant.	No mitigation required	Less than significant
Land Use and Planning		
Impact LU-1. The proposed project would redevelop existing public land and would not physically divide an established community. There would be no impact.	No mitigation required	No impact

Impact	Mitigation Measure (s)	Residual Impact
Impact LU-2. The project would not result in a significant environmental impact due to a conflict with an applicable plan adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.	No mitigation required	Less than significant
Noise		
Impact NOI-1. Temporary construction noise levels associated with the project would be be reduced to less-than-significant levels through implementation of Mitigation Measure NOI-1. Permanent operational noise levels associated with the project's stationary equipment would not exceed County noise standards. A portion of the project site is located within the noise-impacted areas identified in the County's Guidelines for the Preparation of Noise Analysis; however, Mitigation Measure NOI-2 would reduce impacts to below applicable thresholds. Impacts would be less than significant with implementation of mitigation measures NOI-1 and NOI-2.	**NOI-1. Construction Noise Best Management Practices** The project shall implement the following construction best management practices from the County Noise Guidelines: ▪ Limiting hours of construction to avoid the early morning and evening hours (such as 7 a.m. to 7 p.m. weekdays and 7 a.m. to 5 p.m. weekends) ▪ Limiting work to non-motorized equipment on Sundays and holidays ▪ Using sound blankets for loud operations such as pile driving, air compressors or other mechanical equipment, and consider pre-drilling holes prior to pile driving ▪ Siting construction staging areas as far as practical from nearby sensitive receptors ▪ Require street legal mufflers on all construction equipment **NOI-2. Exterior and Interior Land Use Noise Compatibility Compliance.** The entirety of the project site is exposed to exterior noise levels exceeding the County's noise compatibility standard of 60 dB Ldn; therefore, the project applicant shall coordinate with the project architects and other contractors to ensure compliance with the County's noise standards. For the proposed residential component, noise levels in outdoor activity areas shall not exceed 60 dB Ldn and interior noise levels shall not exceed 45 dB Ldn with windows and doors closed. For the proposed office building, interior noise levels shall not exceed 45 dB Leq in the worst-case hour when the building is in use. Outdoor activity area includes, but is not limited to, yard areas, pools, patios, gardens, decks, and balconies of single-family dwellings and related accessory structures, and private or community outdoor use areas for multi-family developments, and other areas which have been designated for outdoor activities and recreation. The specific project-level land use compatibility analysis for the residential component and office component shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis (County of Sonoma 2019). The information contained in the analysis may include the layout and placement of proposed outdoor areas, and the wall, window, door, and room dimensions typical for the proposed buildings. With this specific plan information, the analysis shall determine the predicted exterior noise levels in outdoor use areas and interior noise	Less than significant with mitigation incorporated

Impact	Mitigation Measure (s)	Residual Impact
	levels within the planned buildings. If predicted noise levels are found to be in excess of the applicable limits, the report shall identify architectural materials or techniques that shall be incorporated into the project to reduce noise levels to the applicable limits, which may include, but are not limited to, the following: 1. Exterior Noise Reduction (Residential Portion Only) a) Use of sound walls between the outdoor areas and nearby roadways. b) Placement of the outdoor areas where building attenuation would partially block or fully block the line of sight between the outdoor use area and nearby roadways. 2. Interior Noise Reduction (Residential and Office Portions) a) Orientation of noise-sensitive rooms within proposed buildings away from nearby roadways. b) Installation of windows, doors, and walls with higher Sound Transmission Class ratings over minimum standards. c) Installation or air conditioning or mechanical ventilation systems to allow windows and doors to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained.	
Impact NOI-2. Construction associated with paving and earthmoving activities would temporarily generate vibration levels in the vicinity of the project site that would not exceed vibration standards at nearby structures. The project would not include substantial sources of vibration during operation. Vibration impacts would be less than significant.	No mitigation required	Less than significant
Impact NOI-3. The project site is not located within two miles of an airstrip or airport or within the noise contours of the nearest airstrip or airport; therefore, the project would not expose workers or residents to excessive aircraft-related noise levels and no impacts would occur.	No mitigation required	No impact
Public Services and Recreation		
Impact PS-1. The proposed project would result in an increase in the number of employees and residents. This would increase demand for fire protection services, which could result in the need for new or expanded fire protection facilities. Nonetheless, with	No mitigation required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
compliance with existing State and local regulations, this impact would be less than significant.		
Impact PS-2. The proposed project would result in an increase in the number of employees and residents. This would increase demand for police protection services, which could result in the need for new or expanded police protection facilities. Nonetheless, with compliance with existing local regulations, this impact would be less than significant.	No mitigation required	Less than significant
Impact PS-3. The residential site would result in an increase in population, including school-aged children served by school districts in Santa Rosa. Nonetheless, the proposed project would not result in the need for new or physically altered school facilities. This impact would be less than significant.	No mitigation required	Less than significant
Impact PS-4. The residential site would result in an increase in population which would increase demand for parks and recreational facilities. Nonetheless, the proposed project would not result in the need for new or physically altered parks and recreational facilities. This impact would be less than significant.	No mitigation required	Less than significant
Transportation		
Impact TRA-1. The proposed project would not conflict with adopted transportation plans, ordinances, or policies related to roadway, pedestrian, bicycle, or transit facilities. Impacts would be less than significant.	No mitigation required	Less than significant
Impact TRA-2. The proposed project would not result in a substantial increase in vehicle miles traveled and would be consistent with CEQA Guidelines Section 15064.3(b). Impacts would be less than significant.	No mitigation required	Less than significant
Impact TRA-3. The proposed project would not substantially increase traffic hazards due to roadway geometry or incompatible uses. Impacts would be less than significant.	No mitigation required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact TRA-4. The proposed project would provide adequate access for emergency vehicles. Impacts would be less than significant.	No mitigation required	Less than significant
Tribal Cultural Resources		
Impact TCR-1. No tribal cultural resources were identified as a result of the County's required AB 52 consultation processes. This impact would be less than significant.	**TCR-1. Tribal Cultural Resources Plan** A Tribal Cultural Resources (TCR) Plan shall be required for development occurring in areas identified as potentially sensitive for tribal cultural resources during consultation with FIGR. If the project includes ground disturbance, the TCR Plan shall include a TCR treatment plan to be implemented in the event an unanticipated archaeological resource that may be considered a tribal cultural resource is identified during construction. In the event of an inadvertent discovery of tribal cultural resources or a Native American remain or burial, the TCR Plan shall require consultation with FIGR. The treatment plan shall include any necessary monitoring requirements, suspension of all earth-disturbing work in the vicinity of the find, avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in consultation with FIGR and, if applicable, a qualified archaeologist. Examples of appropriate treatment for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, preservation in place, protecting the confidentiality of the resource, or heritage recovery. The TCR Plan and treatment plan shall be reviewed and approved by the County and FIGR to confirm compliance with this measure prior to construction. **TCR-2. Native American Monitoring** For development occurring in areas identified as potentially sensitive for tribal cultural resources through consultation with FIGR, the project applicant shall retain a FIGR tribal monitor to observe all ground disturbance, including archaeological excavation, associated with development facilitated by the project. Monitoring methods and requirements shall be outlined in a tribal cultural resources treatment plan prepared as described above under Mitigation Measure TCR-1. In the event of a discovery of tribal cultural resources, the steps identified in the TCR treatment plan prepared under Mitigation Measure TCR-1 shall be implemented.	Less than significant with mitigation incorporated

Impact	Mitigation Measure (s)	Residual Impact
Utilities and Service Systems		
Impact UTIL-1. The proposed project would increase demand for water, wastewater, stormwater, electric power, natural gas, and telecommunications. However, the proposed project would occur in developed areas of the City where these facilities exist. Compliance with existing, applicable laws and regulations would reduce potential impacts related to increased demand for water, wastewater, stormwater, electric power, natural gas, and telecommunications. Impacts would be less than significant.	No mitigation required	Less than significant
Impact UTIL-2. The proposed project would increase demand for water supply. However, there is adequate water supply to serve the project during normal, dry, and multiple dry years. Impacts would be less than significant.	No mitigation required	Less than significant
Impact UTIL-3. The proposed project would increase the volume of solid waste generated in the county. However, development facilitated by the project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure. The project would be developed in accordance with solid waste reduction statutes and regulations. This impact would be less than significant.	No mitigation required	Less than significant
Wildfire		
Impact W-1. The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. this impact would be less than significant.	No mitigation required	Less than significant
Impact W-2. The proposed project, which is located within a mapped LRA, would not exacerbate wildfire risks and would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors. this impact would be less than significant.	No mitigation required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact W-3. The proposed project, which is located within an LRA, would not require the installation or maintenance of associated infrastructure which would exacerbate fire risk. Impacts would be less than significant.	No mitigation required	Less than significant
Impact W-4. The proposed project, which is located in an LRA, would not expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant.	No mitigation required	Less than significant
Impact W-5. The project site is not near a wildland area and would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. this impact would be less than significant.	No mitigation required	Less than significant

1 Introduction

This document is an Environmental Impact Report (EIR) for redevelopment of Sonoma County's main Administrative Center campus located at 575 Administration Drive, Santa Rosa, California. The proposed Sonoma County Government Center Project (hereafter referred to as the "proposed project" or "project") would be constructed on the existing County Administration campus. The project would involve the demolition of the five existing buildings on the site followed by the construction of an approximately 250,000-square-foot office building, an approximately 7,000- to 13,000-square-foot Emergency Coordination Center (ECC), and new surface parking lot covered with a solar microgrid. The project would also include up to 1,500 residential units. The project would also include approximately 20,000 square feet of retail or commercial uses within multiple buildings. The residential buildings, including the integrated retail/commercial uses, would have a maximum height of seven stories in an area of the site measuring approximately 14.6 acres. For analytical purposes in this EIR, the residential site is defined to include the proposed 20,000 square feet of retail/commercial uses.

The new County Government Center will be analyzed at the project level, while the residential component will be assessed at the program level because it has not been designed or conceptualized beyond the location and setting a maximum number of units and maximum building height. Section 1.2 provides further detailed reasoning behind the preparation of program- and project-level analysis.

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

1.1 Notice of Preparation Background

Sonoma County distributed a Notice of Preparation (NOP) of the EIR for an agency and public review period starting on December 20, 2024, and ending on February 10, 2025, exceeding the minimum 30-day period required for CEQA. In addition, the County held an EIR Scoping Meeting on January 7, 2025. The meeting, held from 6:00 PM to 7:30 PM, was aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members. The meeting was held in the Permit Sonoma Hearing Room, but the County also provided the option to join remotely using Zoom.

Following the closure of the NOP circulation period on February 10, 2025, the County modified the project and recirculated the NOP with the updated project description. The recirculated NOP reflected several changes to the proposed project, including a reduction in the scale and intensity of the civic office component, with decreased building square footage from 300,000 square feet to 250,000 square feet, a lower building height, and a reduction in the increase in employee capacity from 115 additional employees to 18 additional employees. In contrast, the residential component was expanded, with an increase in the maximum number of units from 1,000 units to 1,500 units, accommodating approximately 32 additional employees associated with the retail/commercial space, and a shift toward a more conceptual development framework that establishes maximum density and height parameters rather than a defined site plan. The NOP was recirculated between

June 10, 2025, and July 10, 2025. The County held another EIR Scoping Meeting during this period, on June 24, 2025. Similar to the EIR Scoping Meeting held on January 7, 2025, this Scoping Meeting was held in the Permit Sonoma Hearing Room with an option to join remotely using Zoom.

The County received letters from the California Department of Toxic Substances Control and the California Department of Transportation in response to the original NOP, and letters from the California Department of Transportation, Sonoma County Transit, and one individual in response to the recirculation of the NOP. The County also received several verbal comments during each of the two EIR scoping meetings.

Both the original and the recirculated NOP are presented in Appendix A of this EIR along with the NOP responses received, Table 1-1 below summarizes the content of the letters and verbal comments and where the issues raised are addressed in the EIR.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request	How and Where It Was Addressed
Original NOP Comments		
Agency Comments		
California Department of Toxic Substances Control	Before demolishing any structures, surveys should be conducted for hazardous materials like lead-based paint, mercury, asbestos, and PCBs, with removal and disposal in compliance with California environmental regulations. Additionally, all imported soil and fill material should be tested for contaminants, documented for origin, and sampled as needed to ensure suitability for the intended land use, following DTSC's PEA Guidance Manual and Clean Imported Fill Material Fact Sheet.	Comments are addressed in Section 4.8, *Hazards and Hazardous Materials*.
California Department of Transportation (Caltrans)	Recommends preserving mature trees and incorporating landscaping around parking areas to reduce visual impacts and stray light from vehicles. Requests a comprehensive Traffic Impact Study to assess potential congestion, safety hazards, and Vehicle Miles Traveled (VMT) impacts on US-101 due to the project's proximity and scale and encourages consistency with the California Transportation Plan 2050, as well as consideration of affordable housing on excess state-owned land. The agency asks to be involved in coordination on a Transportation Management Plan to mitigate construction-related traffic impacts, and notes relevant permits and ADA standards.	Comments related to landscaping and tree preservation are addressed in Section 4.1, *Aesthetics* and Section 4.3, *Biological Resources.* Comments related to traffic and VMT impacts are addressed in Section 4.13, *Transportation and Traffic*. Comments related to project consistency with applicable plans and land use are addressed in Section 4.10, *Land Use and Planning*.

Commenter	Comment/Request	How and Where It Was Addressed
Recirculated NOP Comments		
Agency Comments		
California Department of Transportation (Caltrans)	Caltrans provided the same recommendations for the updated scope of the project.	Comments related to landscaping and tree preservation are addressed in Section 4.1, *Aesthetics* and Section 4.3, *Biological Resources.* Comments related to traffic and VMT impacts are addressed in Section 4.13, *Transportation and Traffic*. Comments related to project consistency with applicable plans and land use are addressed in Section 4.10, *Land Use and Planning*.
Sonoma County Transit	Sonoma County Transit notes that it maintains bus stops and passenger waiting shelters in the vicinity of the project and asks that impacts to this circulation at these locations are assessed.	Comments are addressed in Section 4.13, *Transportation and Traffic*.
Public Comments		
Sonia Taylor	The commenter recommends that the EIR evaluate issues such as traffic and circulation impacts, emergency evacuation capacity, wildfire and flood hazards, air quality, light pollution, and landscaping. They ask that the EIR assess the maximum number of residential units that could be permitted under state housing laws and the implications of recent school closures on transportation. They request that mitigation measures rely on clearly defined projects and call for transparency in the release of supporting technical reports.	Traffic and circulation impacts are addressed in Section 4.2, *Transportation and Traffic*. Emergency evacuation impacts are addressed in Section 4.8, *Hazards and Hazardous Materials*. Wildfire concerns are addressed in Section 4.8, *Hazards and Hazardous Materials* and Section 4.17, *Wildfire*. Flood hazards are addressed in Section 4.9, *Hydrology and Water Quality*. Air quality is addressed in Section 4.2, *Air Quality* and Section 4.7, *Greenhouse Gas Emissions*. Light pollution and landscaping are addressed in Section 4.1, *Aesthetics*. Increases in residential units and applicable permitting are addressed in Section 4.16, *Effects Found Not to be Significant*. Mitigation measures are implemented where applicable for specific environmental topics, including Section 4.4, *Cultural Resources*, Section 4.6, *Geology and Soils*, Section 4.8, *Hazards and Hazardous Materials*, and Section 4.11, *Noise*. Please refer to Section 1.2, below, for an explanation of the maximum residential buildout analyzed in this EIR.

1.2 Purpose and Legal Authority

The proposed project requires the discretionary approval of the Sonoma County Board of Supervisors; therefore, the project is subject to the environmental review requirements of CEQA. The Board has determined that review and recommendation by the Sonoma County Planning Commission is not required for this project; therefore, the Board of Supervisors will serve as the decision-making body for project approval and certification of the EIR. In accordance with Section

15121 of the *CEQA Guidelines* (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

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

This EIR has been prepared as a combination of a Project EIR pursuant to Section 15161 of the *CEQA Guidelines* and a Program EIR pursuant to Section 15168 of the *CEQA Guidelines*. A Project EIR is appropriate for a specific development project like the proposed County office building, ECC, and covered surface parking. As stated in the *CEQA Guidelines*:

> "This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation."

A Program EIR is appropriate for the residential component of the project because it is not yet a designed development project. As stated in *CEQA Guidelines* Section 15168(a), a program EIR can be prepared when a project consists of:

> "As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The housing evaluated within this EIR represents a conceptual program for future housing on the project site. The analysis within this EIR pertaining to residential development evaluates a conservative scenario for environmental impacts based on the assumption that the maximum buildout considered by the County (1,500 residential units and 20,000 square feet of retail/commercial) would occur.

This EIR is to serve as an informational document for the public and Sonoma County decision makers. The process will include public hearings before the Board of Supervisors to consider certification of a Final EIR and approval of the proposed project.

1.3 Scope and Content

This EIR addresses the associated environmental impacts from the proposed project. The following impact areas have been studied in detail in this EIR:

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

Section 6.0, *Alternatives*, of the EIR was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the environmentally superior alternative among the alternatives assessed. The alternatives evaluated include the CEQA required No Project Alternative and alternative development scenarios for the project site, including Alternative 1: No Project Alternative, Alternative 2: 200 Unit Buildout, Alternative 3: 650 Unit Buildout, and Alternative 4: Retention of the Administration Building.

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

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

This EIR is informed by pertinent County policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7.0, *References*.

1.4 Issues Not Studied in Detail in the EIR

Table 1-2 summarizes the environmental checklist topics for which the project was determined to have either no impact or a less than significant impact. Therefore, these issues are not discussed in detail in the EIR and are instead addressed in Section 4.16, *Effects Found Not to be Significant*.

Table 1-2 Issues Not Studied in the EIR

Issue Area	Initial Study Findings
Agricultural Resources	The project site is within an urbanized area of Santa Rosa that lacks agricultural lands or forests. No impact to these resources would occur.
Mineral Resources	The project involves redevelopment of land that is already developed and is located in an urbanized area of Santa Rosa. No mineral resources of value to the region or the residents of the state have been identified within the project area and the project area is not suited for resource extraction given the urban location. No impact would occur.
Population and Housing	The proposed project would involve the development of a mixed-use site, including office buildings, an Emergency Coordination Center, and residential units. The project would introduce up to 1,500 residential units, including approximately 70 percent affordable units. However, this growth is within range of what was previously planned for the City and County.
	There are no housing units on the project site or people residing on the project site in any form of temporary housing. Therefore, the project would not displace any existing housing units or people. No impact would occur.

1.5 Lead, Responsible, and Trustee Agencies

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

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. The California Department of Fish and Wildlife acts as both a responsible and trustee agency for the project.

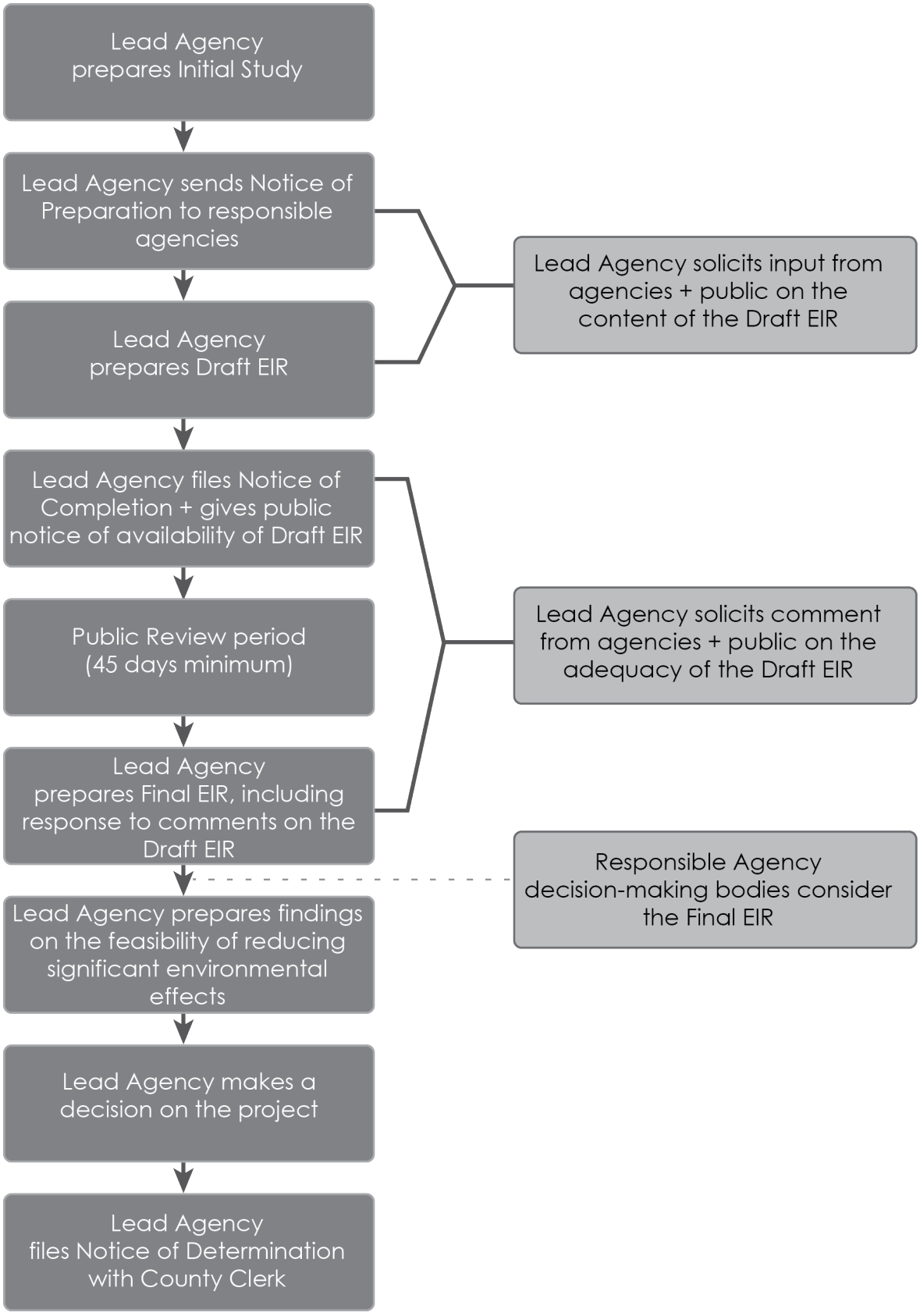
1.6 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation (NOP) and Initial Study**. After deciding that an EIR is required, the lead agency (Sonoma County) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the project could create significant environmental impacts.
2. **Draft EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion (NOC).** The lead agency must file a NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).
4. **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments on the Draft EIR.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).

6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations**. For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1-1 Environmental Review Process



2 Project Description

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

2.1 Project Sponsor

Sonoma County Public Infrastructure
2300 County Center Drive, Suite B 100
Santa Rosa, California 95403
(707) 565-2231

2.2 Lead Agency Contact Person

C. Warren Sattler, Special Projects Director
Sonoma County Public Infrastructure
County of Sonoma
400 Aviation Blvd., Suite 100 Santa Rosa, California 95403
(707) 565-3915

Chris Seppeler, Senior Environmental Specialist
Sonoma County Public Infrastructure
County of Sonoma
400 Aviation Blvd., Suite 100
Santa Rosa, California 95403
(707) 565-8353

Rob Aguero, Senior Environmental Specialist
Sonoma County Permit and Resource Management Department
County of Sonoma
2550 Ventura Avenue
Santa Rosa, California 95403
(707) 565-3718

2.3 Project Location

The project would occur on a portion of the existing County Administration Center (CAC), located on Sonoma County Assessor's Parcel Number (APN) 180-030-012, which is bounded by Bicentennial Way to the north, Steele Lane to the south, Mendocino Avenue to the east, and State Highway 101 (Highway 101) to the west. The project site includes the portion of the existing CAC that covers the areas north and east of Administration Drive and west of Ventura Avenue, referred to hereinafter as the "office site." The project site also includes the area east of Ventura Ave, north of Administration Drive, west of Mendocino Avenue and south of Fiscal Drive referred to hereinafter as the "residential site." The project site is regionally accessible via State Highway 101 and locally

accessible via Administrative Drive, Professional Drive, Ventura Avenue, County Center Drive, and Mendocino Avenue. The site is currently developed with County buildings; refer to Section 2.4, *Existing Conditions*, below. The site is in an urban area, has been previously graded and developed, and is surrounded by roads and office buildings. The project's regional location is shown in Figure 2-1, with the specific site location shown in Figure 2-2.

2.4 Existing Site Characteristics

2.4.1 Existing Conditions

The CAC site is currently developed with five low-rise County-used government office buildings and surface parking. Buildings on the CAC site and other adjacent County government buildings include Permit Sonoma (2550 Ventura Avenue), Human Services (2550 Paulin Drive), Administration Building (575 Administration Drive), Fiscal Building (585 Fiscal Drive), Redwood Building (370 Administration Drive), Hall of Justice (600 Administration Drive)[1], Main Adult Detention Facility (2777 Ventura Avenue), Sherriff's Complex (2796 Ventura Avenue), Light Fleet (709 Russell Avenue), Central Mechanical Plant (2680 Ventura Avenue), Family Justice Center (2755 Mendocino Avenue), Information Systems/Programming and Probation Administration (2615 Paulin Drive), and Agriculture Building (2604 Ventura Avenue) (see square footage of CAC site buildings in Table 2-1).

2.4.2 Current Land Use Designation and Zoning

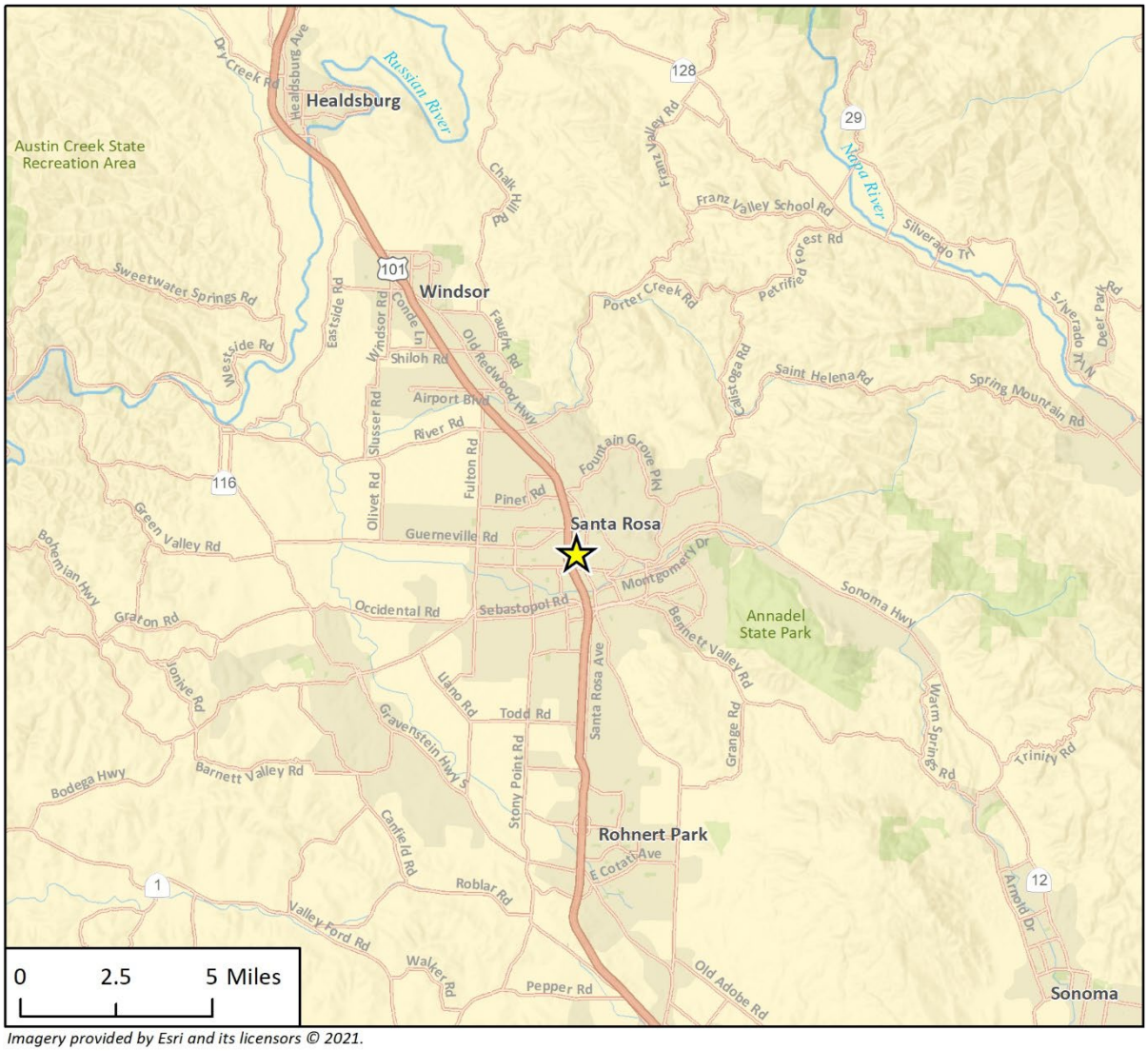
Under California Government Code Sections 53090 and 53091, cities and counties are exempt from complying with each other's building codes and zoning ordinances.[2] As such, even though the County-owned property is located within the City of Santa Rosa, the City's General Plan and zoning ordinances do not apply to the project site.[3] The project site is not currently designated under the County's General Plan.

While the County is not subject to the City's building and zoning laws, the County does intend, where appropriate and feasible, to work with the City to avoid land use conflicts. The office site has a City of Santa Rosa General Plan land use designation of Public/Institutional and is zoned Public and Institutional (PI). Sites with land use designations of Public/Institutional are areas or clusters of governmental or semi-public facilities. According to the City General Plan, new facilities may be appropriate in any land use category based on need and subject to environmental review. PI zoning permits uses such as public facilities, utilities, and hospitals. The PI zoning district is consistent with and implements the Public/Institutional General Plan land use designation. Thus, even though the County and the project are exempt from the City's General Plan and zoning ordinance, the project at the office site would be consistent with both.

The residential site also has a City of Santa Rosa General Plan land use designation of Public/Institutional and is zoned Public and Institutional (PI). The proposed project at the residential site would not comply with the City's land use and zoning requirements; however, as discussed above, the City's General Plan and zoning ordinances do not apply to the project site. Furthermore, the project site has been identified in the County's Housing Element to accommodate housing units that would be developed consistent with a governmental purpose of the County (Sonoma County 2023).

[1] The Hall of Justice (a state facility) is currently under construction and is estimated to be completed in July 2024.
[2] See also 40 Ops.Cal. Atty.Gen. 243 (1962)
[3] *Lawler v. City of Redding* (1992) 7 Cal.App.4th 778

Figure 2-1 Regional Location



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Project Location

N

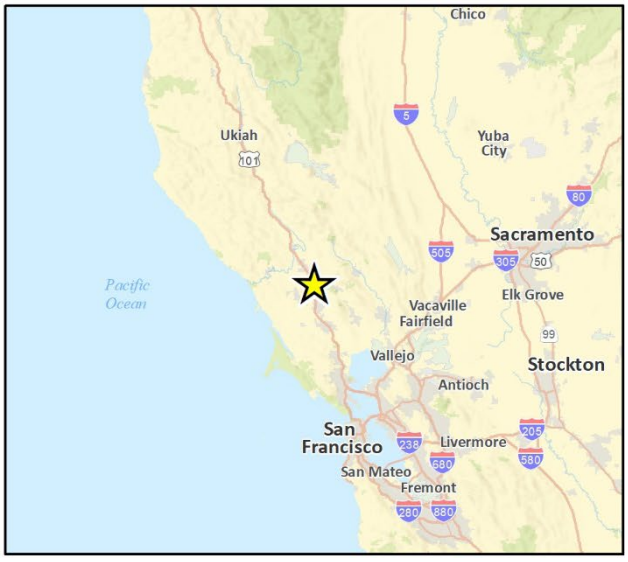


Figure 2-2 Project Site Location



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21-11603 EPS
Fig 2-2 Project Location

The proposed project would not require amendments to the County's General Plan or Zoning Code, as the parcels have no County land use and zoning designations.

2.4.3 Surrounding Land Uses

The project site is bordered by Administration Drive to the west and south; Mendocino Avenue to the east; and the Central Mechanical Plant (CMP) to the north. The Superior Court of California and Santa Rosa Municipal Court buildings are to the west of the project site adjacent to Administration Drive. A bank facility and single-family residential development is located approximately 50 feet south of the project site. Commercial uses along Mendocino Avenue border are located to the west of the project site. An apartment complex is located approximately 410 feet north of the project site on Ventura Avenue. The site is immediately surrounded by surface parking and low-rise buildings.

2.5 Project Characteristics

2.5.1 Background

Most of the current CAC was constructed in the 1950s and has remained largely unchanged since then. The operating cost of the existing buildings along with deferred maintenance obligations have outpaced County resources. The low-rise buildings represent an inefficient land use, inhibiting the effective delivery of public services. Due to these existing inefficiencies, the County currently leases market-rate commercial offices to accommodate employees; refer below to Section 2.5.2 regarding the number of existing employees. Without updates to existing buildings, deferred maintenance cost backlog is expected to grow to over $750 million by 2035.

Program 4c in the County's current Housing Element (August 2023), one of the elements in the County General Plan, identifies the CAC as an area that could accommodate future housing that would be developed consistent with a governmental purpose of the County, in order to maintain an inventory of sites to meet its Regional Housing Needs Allocation (RHNA). Program 4c reads: "As an additional strategy to address its RHNA shortfall, the has [*sic]* County identified the existing County Administrative Center campus in the City of Santa Rosa to accommodate development of 200 housing units that would be developed consistent with a governmental purpose of the County, including but not limited to at least 180 units affordable to lower-income households including special needs populations and County employees. These units would be developed through an RFP process; sites would be ground leased and would remain County-owned. City land use and zoning regulations would not apply. The County would retain authority to approve entitlements and issue permits on this County-owned site pursuant to the County's sovereign immunity under Government Code §§ 53090-53091. The County will monitor progress toward development of housing on the County Administrative Center campus and will identify and rezone backup sites for housing if there is inadequate progress to ensure compliance with no net loss laws and maintain adequate sites to meet the County's RHNA."

2.5.2 Description of Project

The County proposes to replace portions of the CAC to include one office site consisting of up to 263,000 square feet of development, including an approximately 250,000-square-foot office building and a 7,000 to 13,000-square-foot Emergency Coordination Center (ECC), as well as a covered surface parking lot with a solar microgrid. The project would also include approximately 20,000 square feet of retail/commercial uses, and up to 1,500 residential units. The office building

would house an approximately 3,500 gross square foot Board of Supervisors chamber. The office building would collectively house up to approximately 1,200 full-time employees. The office component would accommodate approximately 18 additional employees over existing conditions (see Table 2-1). The building would be no more than five stories.

The ECC would be housed in an approximately 7,000 to 13,000 gross square foot single-story structure, of which up to 5,000 gross square feet would be dedicated to emergency operations, while the remainder would function as conference rooms during non-emergencies. During emergencies, the entire building would function to respond to disasters. Walls between conference rooms would be foldable to allow the building to operate as a single space during emergencies. The proposed location of the surface parking (see Section 2.5.4, *Parking and Site Access*), office building, and ECC are shown in Figure 2-3. Throughout this EIR, the project on the office site is analyzed at a project level.

The project would also include up to approximately 1,500 residential units and 20,000 square feet of retail/commercial space over 14.6 acres. The retail/commercial component would accommodate approximately 32 additional employees at the project site (see Table 2-1). It is estimated that the residential buildings would have a maximum height of seven stories. Throughout this EIR, the residential component of the project (which also includes the retail/commercials space) is analyzed on a programmatic level.

Features would be incorporated into the project design to ensure the office site and residential and retail/commercial site are integrated across the project site. Amenities including common open space, pedestrian walkways, and covered parking with a solar microgrid would be provided for future office employees and residents.

Project characteristics as compared to existing conditions are shown in Table 2-1.

Table 2-1 Project Characteristics

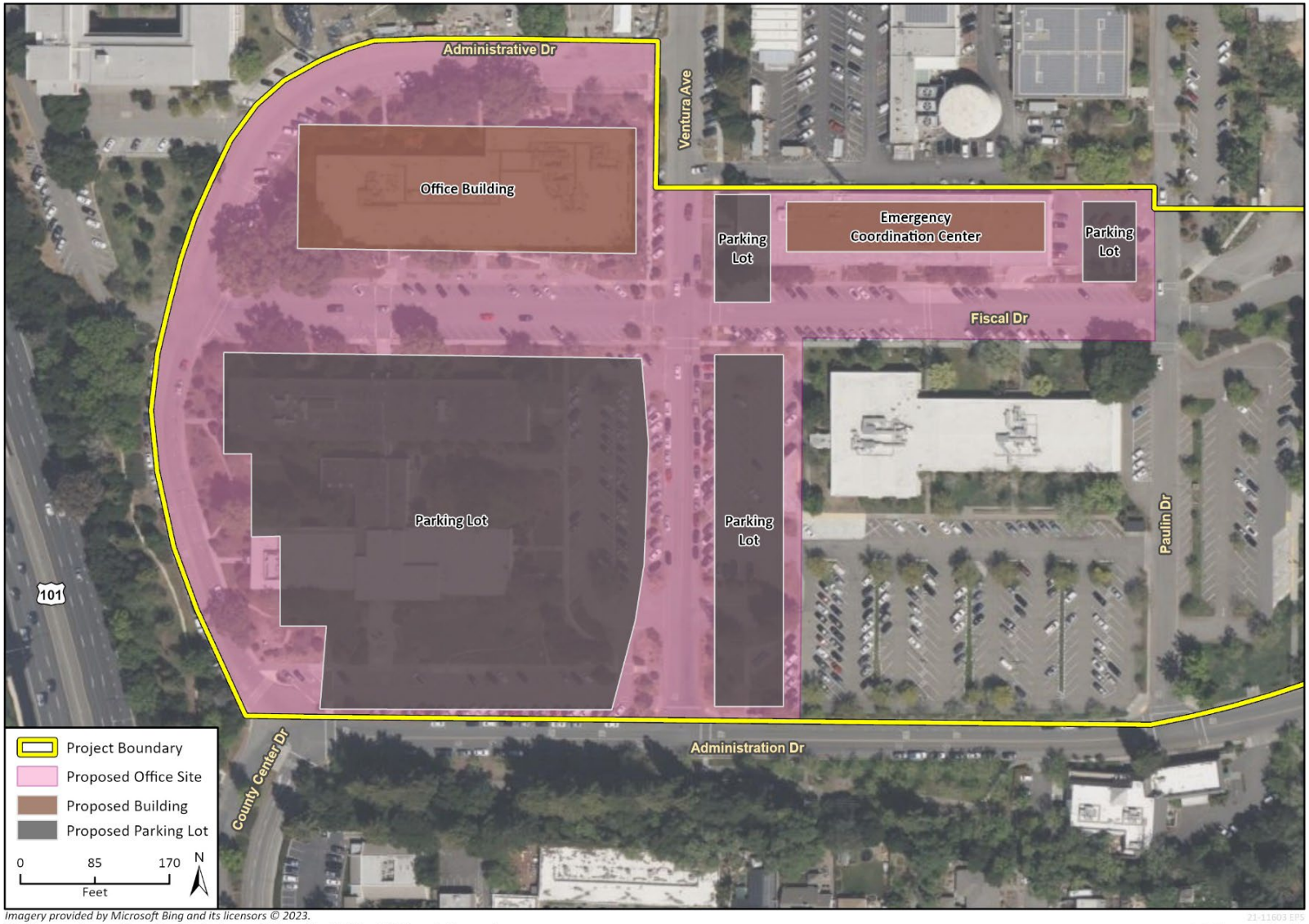
Project Feature	Existing[1]	Proposed
Building Square Footage	185,500	up to 263,000
Permit Sonoma	*31,400*	*N/A*
Human Services	*42,000*	*N/A*
Administration Building	*46,900*	*N/A*
Fiscal Building	*35,600*	*N/A*
Law Library / Registrar of Voters Building	*29,600*	*N/A*
Office Building	*N/A*	*250,000*
Emergency Coordination Center	*N/A*	*7,000 to 13,000*
Total Commercial Uses	N/A	20,000
Total Office Buildings	6	1
Total Residential Buildings	N/A	25
Maximum Building Height (stories)	2	7
Full-Time Employees Accommodated		
Office Site[3]	1,182	Up to 1,200
Retail/Commercial Component	N/A	32
Residential Units	N/A	1,500
Office Parking Stalls	1,417	1,050

[1] Includes only buildings slated for demolition

[2] Includes 220,000 to 250,000 square feet for the main office building and 7,000 to 13,000 square feet for the Emergency Coordination Center. This EIR will analyze the highest numbers in the range to provide the most conservative analysis.

[3] Includes 882 employees currently at CAC buildings to be demolished, 300 employees at CAC buildings that would remain, and up to 515 employees that would move from leased properties off-site.

Figure 2-3 Proposed Office Site



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Site Plan georeferenced from New County Campus Options - One Building, CGC Presentation, pg. 8.

21-11603 EPS
Fig 2-3 Proposed Office Site

Figure 2-4 Proposed Residential Site



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21-11603 EPS
Fig 2-5 Proposed Residential Site

2.5.3 Demolition and Construction

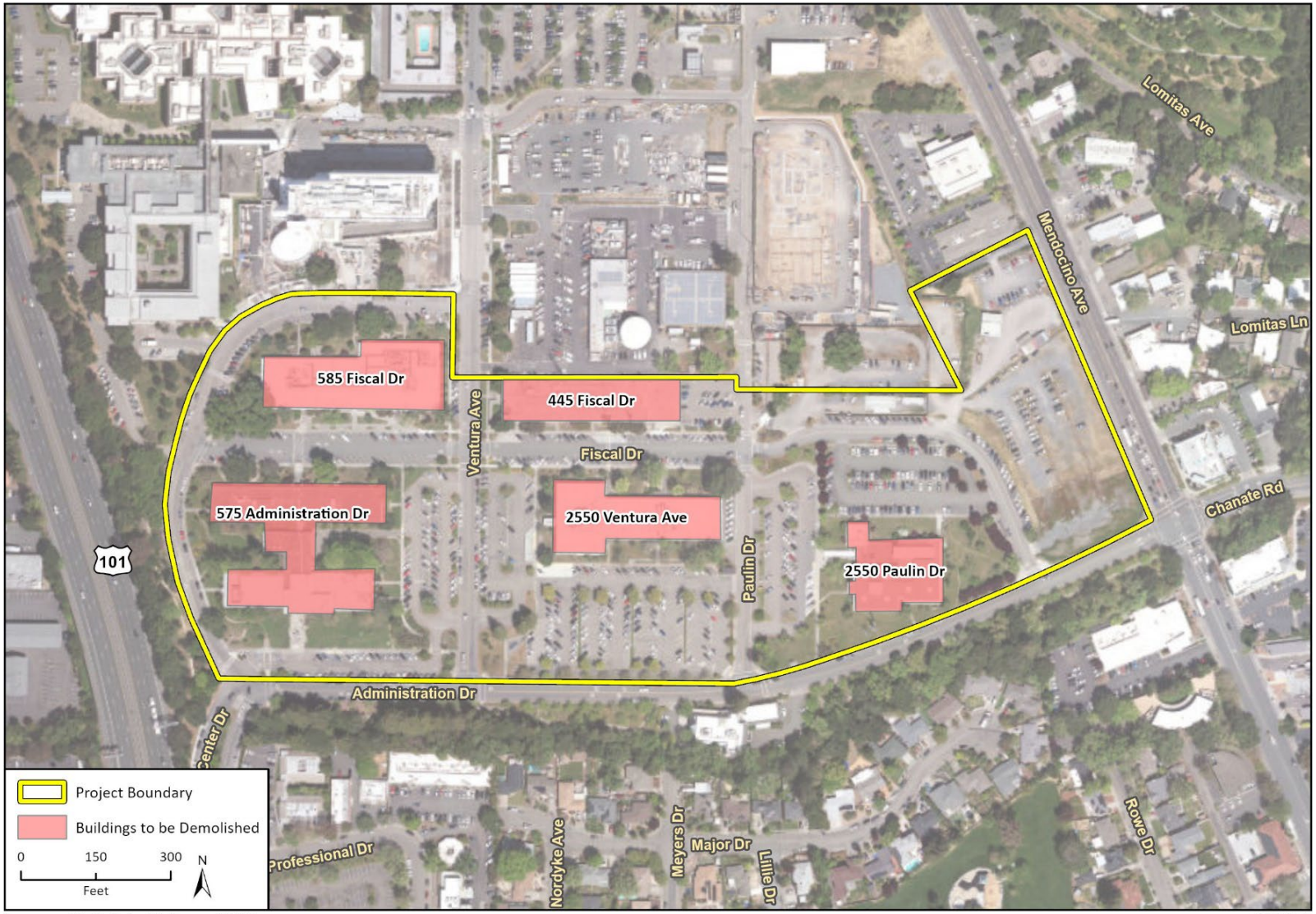
Construction would commence in 2027 at the earliest. The proposed project would involve the demolition of five existing buildings on the project site, including Permit Sonoma at 2550 Ventura Avenue (31,400 gross square feet, single story), Human Services Building at 2550 Paulin Drive (42,000 gross square feet, two stories), Administration Building at 575 Administration Drive (46,900 gross square feet, single story), Fiscal Building at 585 Fiscal Drive (35,600 gross square feet, single story), the Law Library and the Registrar of Voters Building at 2604 Ventura Ave and 435 – 455 Fiscal Drive (29,600 gross square feet). Buildings to be demolished are shown in Figure 2-5. The existing buildings were constructed in the 1950s. The 12 buildings located on the northern portion of the CAC, including the Sheriff's Office, Evidence Storage, Main Adult Detention Facility, and Central Mechanical Plant, are not part of the project site. No changes are proposed to these buildings, and they are not included in the scope of the proposed project. The project would not involve pile driving for foundation work.

Construction would be phased to construct new facilities on unoccupied property and minimize disruption to ongoing County operations. No temporary office space will be needed for those buildings to be demolished. Phased construction may follow the proposed order or a similar order:

1. Demolish the Fiscal Building
2. Build an approximately 250,000 square foot office building
3. Demolish Administration Building and replace with parking
4. Demolish Law Library / ROV Building and replace with parking.
5. Demolish Permit Sonoma and Human Services buildings
6. Build a one-megawatt solar micro-grid over covered parking area
7. Build Emergency Coordination Center

In addition to the construction schedule for County facilities described above, construction on the residential site would occur in phases dependent on the timing of development applications for the residential site. The phased approach to residential construction on the residential site is anticipated to result in the development of all 1,500 residential units and 20,000 square feet of retail/commercial space by 2031.

Figure 2-5 Buildings to be Demolished



2.5.4 Parking and Site Access

The project would include approximately 5.5 acres of surface parking, comprising approximately 1,050 parking stalls. The project site west of Ventura Avenue, south of Fiscal Drive and the east and north sides of Administration Drive would be devoted to surface parking, while a smaller parking lot would be east of the proposed buildings, east of Ventura Avenue. A solar micro-grid with on-site battery storage would be constructed over the entirety of the surface parking lot. The project would be regionally accessible via Highway 101 and locally accessible via Administration Drive, County Center Drive, Professional Drive, Mendocino Avenue, and Ventura Avenue.

2.5.5 Utilities

The City of Santa Rosa provides the following utility services to the project site: water, wastewater, and stormwater. Pacific Gas and Electric (PG&E) provides natural gas and electricity, and the project would include a one MW microgrid to supplement energy demand. Recology Sonoma Marin provides solid waste services. Sonic, Vista Broadband Networks, CDS Wireless Inc./CDS Enterprise, Integra Telecom of California, Net10 Internet Services, Pacific Online, AT&T, Comcast, Dish, and Verizon Wireless offer telecommunications services.

Water (eight-inch mains) and sanitary sewer are available along Ventura Avenue. An existing 12 kilovolt loop serves Administration Drive, Paulin Avenue, and Ventura Avenue. Natural gas is available through existing gas lines along Ventura Avenue.

2.5.6 Stormwater

The project would include stormwater design features consistent with requirements of the County's MS4 permit, and Low Impact Development. Stormwater features may include but are not limited to: bioretention methods, such as rain gardens, green roofs, tree boxes, vegetated planters, and swales; non-mechanical landscape/soil filtration-based methods such as porous pavement, modular treatment controls, detention ponds. Any existing Caltrans MS4 features, currently located in the Permit and Resource Management Department (PRMD) parking lot, would be replaced or mitigated to the extent required.

2.6 Project Objectives

The County has identified the following objectives for the project:

- Design and construct a new County Administration Center to use County resources more efficiently;
- Provide housing opportunities for County employees;
- Provide housing opportunities for a variety of income levels, with an emphasis on affordable housing opportunities for low and very low-income households;
- Provide housing consistent with Program 4c in the County's adopted Housing Element;
- Provide housing near jobs, transit, services, schools, and community-serving retail and/or commercial establishments;
- Provide access to public transportation and SMART from County Administration Center;
- Implement goals, objectives, and policies of the Sonoma County General Plan focused on growth in established Urban Service Areas; and
- Modernize and improve workplace accessibility, seismic safety, and efficiency.

2.7 Required Approvals

The proposed project would require the following permits and/or approvals:

Required approvals by the County of Sonoma include:

- Certification of the EIR
- Adoption of the EIR Findings and Statement of Overriding Considerations
- Adoption of a Mitigation, Monitoring, and Reporting Program in conjunction with the EIR
- Adoption of the Sonoma County Government Center Project
- Demolition, grading, and building permits from PRMD

In addition, approvals that may be required by other agencies include:

- **City of Santa Rosa** – Issuance of a Will Serve letter for utility connections.
- **California Department of Fish and Wildlife** – Fish and Game Code Section 1602 Agreement for work proposed in the California Department of Fish and Wildlife jurisdictional area.
- **United States Army Corps of Engineers** – Clean Water Act Section 404 permit for work proposed in the United States Army Corps of Engineers jurisdictional area, if needed.
- **North Coast Regional Water Quality Control Board** – Clean Water Act Section 401 permit for work proposed in the North Coast Regional Water Quality Control Board jurisdictional area, if needed.

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4.0, *Environmental Impact Analysis*.

3.1 Regional Setting

The project site is located in the City of Santa Rosa. It is located directly adjacent to the east of the US 101 Highway (Highway 101). The project site is currently occupied by the existing Sonoma County Administration Center campus. Figure 2-1 in Section 2, *Project Description*, shows the location of the project site in the region. Figure 2-2 shows the location of the project site in relationship to the surrounding neighborhood.

A grid system of east-west and north-south roadways, including arterials, collectors, and local streets, provides vehicular access throughout the City and County. The major roadways include Mendocino Avenue, Bicentennial Way, Cleveland Avenue, and Fountaingrove Parkway. The closest freeway is the Highway 101, which is located directly adjacent to the project site's west side.

The Mediterranean climate of the region and the coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months. Although air quality in the area has steadily improved in recent years, Sonoma County remains a nonattainment area for ozone (urban smog). The City of Santa Rosa is located approximately 17 miles inland from the coastline of the Pacific Ocean.

3.2 Project Site Setting

As shown in Figure2-3 in Section 2, *Project Description,* the project site is bordered by Highway 101 to the west, Mendocino Avenue to the east, Russell Avenue to the north, and Administration Drive to the south. There are existing office and commercial buildings to the west of the project site across Highway 101, office and residential buildings east across Mendocino Avenue and south across Administration Drive, and office buildings and residential buildings to the north across Russell Avenue.

The project site is currently occupied by the existing Sonoma County Administration Center campus and has a City General Plan land use designation of Public/Institutional. The site is zoned PI (Public/Institutional), as defined by the City's Zoning Ordinance and the Land Use Element of the City's General Plan. Uses permitted in the PI designation include public facilities, utilities, hospitals, and public assembly facilities such as public schools, libraries, and government offices. As described in Section 2.4.2, *Current Land Use Designation and Zoning*, of Section 2, *Project Description*, under California Government Code Sections 53090 and 53091, cities and counties are exempt from complying with each other's building codes, general plans and zoning ordinances. As such, even though the County-owned property is located within the City of Santa Rosa, the City's building codes, General Plan and zoning ordinances do not apply to the project site. The site has no County land use designation or zoning. Further, according to County Code Section 26.02.070, the County zoning regulations do not apply to public projects of the County.

3.3 Cumulative Development

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

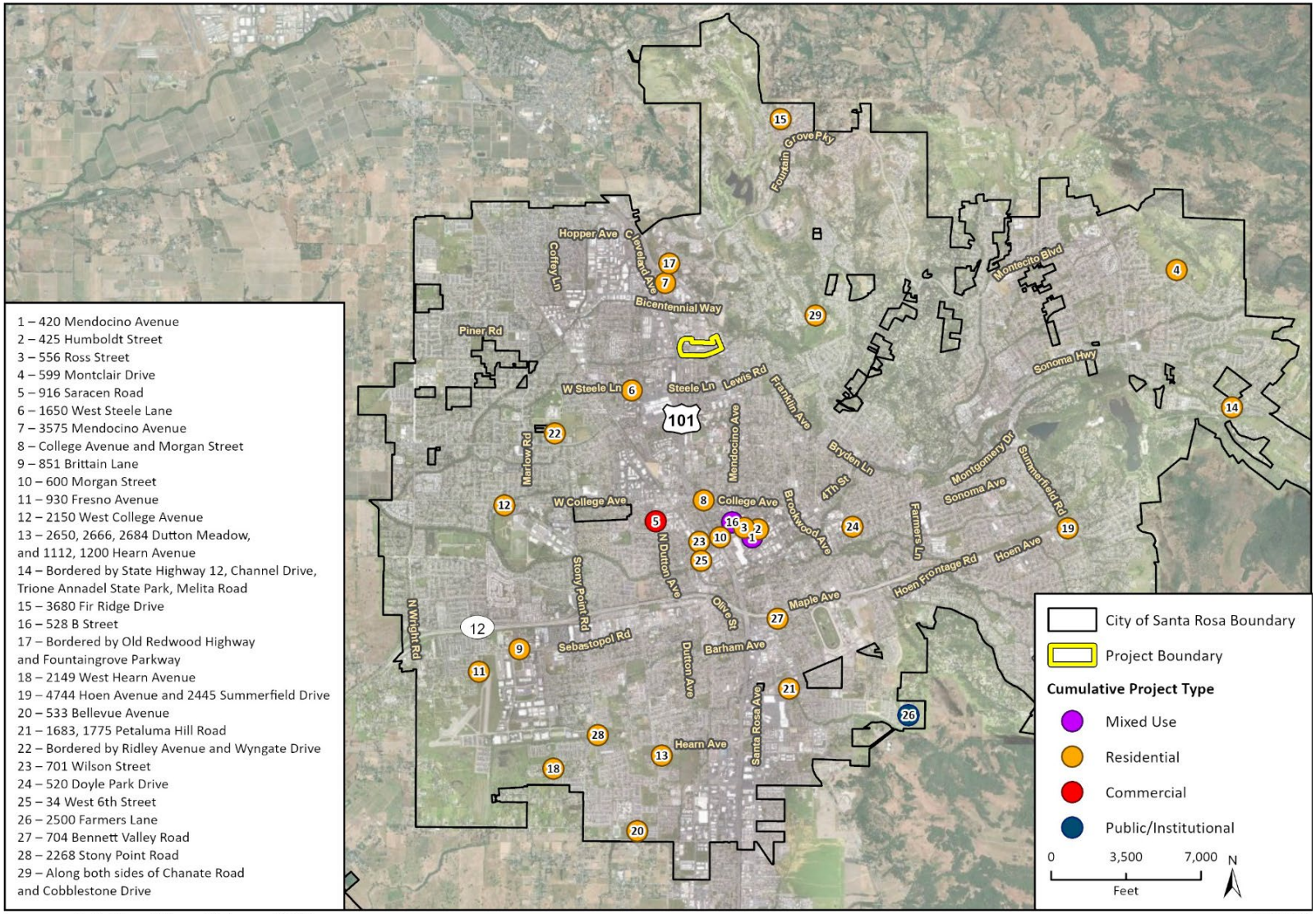
CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Currently planned and pending projects in Santa Rosa and surrounding areas are listed in Table 3-1. In particular, the 1650 West Steele Lane Project, 3575 West Mendocino Avenue Project, the project located on the corner of Morgan Street and College Avenue, 528 B Street Project, the Ridley Avenue and Wyngate Drive Project, and the Chanate Road and Cobblestone Drive Project are either located in close proximity or along the same major arterial as the project site and construction schedules may overlap. These projects are considered in the cumulative analyses in Section 4.0, *Environmental Impact Analysis*.

Table 3-1 Cumulative Projects List

Project No.	Project Location	Land Use
City of Santa Rosa		
1	420 Mendocino Avenue	Mixed-Use
2	425 Humboldt Street	Residential
3	556 Ross Street	Residential
4	599 Montclair Drive	Residential
5	916 Saracen Road	Commercial
6	1650 West Steele Lane	Residential
7	3575 Mendocino Avenue	Residential
8	College Avenue and Morgan Street	Residential
9	851 Brittain Lane	Residential
10	600 Morgan Street	Residential
11	930 Fresno Avenue	Residential
12	2150 West College Avenue	Residential
13	2650, 2666, 2684 Dutton Meadow, 1112, 1200 Hearn Avenue	Residential
14	Bordered by State Highway 12, Channel Drive, Trione Annadel State Park, Melita Road	Residential
15	3680 Fir Ridge Drive	Residential
16	528 B street	Mixed Use
17	Bordered by Old Redwood Highway and Fountaingrove Parkway	Residential
18	2149 West Hearn Avenue	Residential
19	4744 Hoen Avenue and 2445 Summerfield Drive	Residential
20	533 Bellevue Avenue	Residential
21	1683, 1775 Petaluma Hill Road	Residential
22	Bordered by Ridley Avenue and Wyngate Drive	Residential
23	701 Wilson Street	Residential
24	520 Doyle Park Drive	Residential
25	34 West 6th Street	Residential
26	2500 Farmers Lane	Public/Institutional
27	704 Bennett Valley Road	Residential
28	2268 Stony Point Road	Residential
30	Along both sides of Chanate Road and Cobblestone Drive	Residential

Source: City of Santa Rosa 2025

Figure 3-1 Cumulative Projects



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21-11603 EPS
Fig X Cumulative Projects

4.1 Aesthetics

This section identifies and evaluates issues related to aesthetics in the context of the proposed project. The section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to aesthetics; and potential impacts related to aesthetics that would result from implementation of the proposed project.

4.1.1 Setting

The following subsections discuss the existing setting of the project site as it pertains to scenic vistas, scenic highways, scenic resources, visual character and quality, and light and glare. The California Environmental Quality Act (CEQA) and the CEQA Guidelines focus on addressing effects to public views (defined as those experienced from publicly accessibly vantage points); therefore, public views are the focus of this discussion.

a. Scenic Vistas

For the purposes of analysis, given that the project site is in Santa Rosa, a scenic vista is a view from a public place (roadway, designated scenic viewing spot, etc.) that is expansive and considered by the City of Santa Rosa to be important. It can be obtained from an elevated position (such as from a trail near the top of a hillside) or it can be seen from a roadway with a longer-range view of the landscape.

The project site is located in the northern portion of the city of Santa Rosa which is an urbanized area surrounded by urban development to the north, south, east, and west. Highway 101 is directly west of the project site. A creek with trees and natural vegetation is on the opposite side of Administration Drive on the south side of the project site.

The city has several view corridors of ridgelines such as Taylor Mountain and Bennett Mountain which are along the southeastern edge of the city (City of Santa Rosa 2024). The city is also surrounded by hillsides to the north and east. The project site is not within or adjacent to any scenic vistas nor does it provide views of any existing vistas due to surrounding development and landscaping. Furthermore, the project site is not within any scenic resource areas as identified in the Sonoma County General Plan 2020 (County of Sonoma 2016).

b. Scenic Highways

The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been officially designated. A highway may be designated scenic depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. Scenic highways must have an approved Corridor Protection Program and remain in compliance to maintain scenic highway status. According to the California Department of Transportation (Caltrans) State Scenic Highway Mapping System, the nearest designated scenic highway is a portion of SR 12 which is approximately 6.4 miles east of the project site (Caltrans 2019). The nearest eligible scenic highway is a portion of Route 101 which is approximately two miles south of the project site (Caltrans 2019).

Additionally, the City of Santa Rosa defines scenic roadways as "a highway, road, drive, or street that, in addition to its transportational function, provides opportunities for the enjoyment of natural and man-made scenic resources" (City of Santa Rosa 2025). The Santa Rosa General Plan designates the following as scenic roadways within the city (City of Santa Rosa 2025):

- Melita Road
- Los Alamos Road
- Calistoga Road (north of Badger Road)
- Highway 12 (from Highway 101 west to Fulton Road)
- Highway 12 (from Farmers Lane to Calistoga Road)
- Montecito Avenue (north of Norte Way)
- Brush Creek and Wallace Roads
- Fountaingrove Parkway
- Bennet Valley Road (south of Farmers Lane)
- Montgomery Drive (from Mission Boulevard to Melita Road)
- Chanate Road (from Mendocino Avenue to Fountaingrove Parkway)
- Petaluma Hill Road (from Colgan Avenue to UGB)
- Highway 101 (contiguous from northern to southern city limit)
- Los Olivos Road
- Manzanita Road
- Newanga Avenue
- Francisco Avenue
- Channel Drive
- Wright Road South
- Ludwig Avenue
- Burbank Avenue

The City-designated scenic roadway that is closest to the project site is Highway 101 which is approximately 100 feet west of the westernmost edge of the site. Chanate Road, at its terminus with Mendocino Avenue, is also close to the project site, approximately 125 feet to the east of the easternmost edge of the site. Administration Drive, which is not a scenic roadway, lies between Highway 101 and the project site. Additionally, there are existing trees, vegetation, and fencing which provide a buffer between Highway 101 and Administration Drive.

c. Scenic Resources

Scenic resources are important visual assets that contribute to community identity. These resources can include landforms, trees, water features, and the built environment insofar as they enhance and define the visual character of a landscape. Scenic resources include natural and open spaces, as well as the built environment, particularly if certain architecture is of historic or artistic value.

Designated scenic resources within the city include natural waterways, hillsides, and distinct districts. The project site is not within any scenic resource areas as identified in the Sonoma County General Plan (County of Sonoma 2016). The Santa Rosa General Plan designates Taylor Mountain, Bennet Mountain, Old Courthouse Square, De Turk Round Barn, Railroad Square water tower, St. Rose School, Hotel La Rose, Santa Rosa Creek, Luther Burbank Home and Gardens, and views to the hills surrounding the city as scenic resources (City of Santa Rosa 2025).

There are no designated scenic resources within or adjacent to the project site. The Mayacamas Mountain range lies along the eastern edge of the city, approximately 6 miles east of the project site.

d. Light and Glare

In the context of the CEQA Guidelines, light is nighttime illumination that stimulates sight and makes things visible. Glare is a visual condition in which the presence of bright light, such as direct or

reflected sunlight, reduces visibility. Typical sources of light include streetlights, exterior building lighting, and interior building lighting shining through widows. Typical sources of glare include reflective building materials such as large windows or reflective coatings.

Light conditions in the vicinity of the project site are typical of those found in urban areas (e.g., roadway lighting, commercial parking lot and building lighting, residential buildings, headlights from motor vehicles). Sources of daytime glare near the project site include direct beam sunlight and reflections from the windows, architectural coatings, glass, and other reflective surfaces on nearby buildings and cars parked along nearby roadways. Sources of nighttime light near the project site include lighted signs, streetlights, and vehicle headlights, particularly from Highway 101 and Mendocino Avenue.

4.1.2 Regulatory Setting

a. Federal Regulations

No existing federal plans, policies, regulations, or laws related to aesthetics are applicable to the proposed project.

b. State Regulations

California Scenic Highway Program

The California Department of Transportation manages the State Scenic Highway Program. The program was created in 1963 with the goal of protecting the aesthetic significance of scenic highways throughout California. According to California Streets and Highways Code Sections 260 through 263, a highway may be designated as scenic based on its scenic quality, how much of the natural landscape can be seen by travelers, and the extent to which development intrudes on the traveler's enjoyment of the view. The State Scenic Highway Program's Scenic Highway System List identifies scenic highways that are either eligible for designation or have already been designated as such.

California Code of Regulations Title 24 - Building Lighting Characteristics

The California Building Standards Code (California Code of Regulations [CCR] Title 24) includes the Building Energy Efficiency Standards (included in Parts 6 and 12 of CCR Title 24). Section 6.3 of the Nonresidential and Multifamily Compliance Manual of the Building Energy Efficiency Standards regulates lighting characteristics (i.e., maximum power/brightness, shielding, light sensor controls).

Different lighting standards are set by classifying areas by lighting zone. The classification is based on 2010 United States Census population estimates. Areas can be designated as LZ0 (very low), LZ1 (low), LZ2 (moderate), LZ3 (moderately high), and LZ4 (high). Lighting requirements for dark and rural areas are stricter in order to protect the areas from new sources of light pollution and light trespass.

The project site falls within the LZ3 zone because it is within Santa Rosa which is designated as an urbanized area under CEQA Guidelines Section 21071 due to the population of the city being over 100,000 people.

c. Local Regulations

Sonoma County General Plan 2020

As described in Section 2, *Project Description*, the project site is not governed by the City of Santa Rosa's General Plan since it is County-owned property. The Land Use Element of the Sonoma County General Plan, which was adopted in 2008 and amended in 2016, includes the goals and policies related to aesthetics. The goals generally pertain to protecting or enhancing the scenic resources that characterize much of unincorporated Sonoma County. Although the project site is located within the City of Santa Rosa, it is not identified as a scenic resource area in the County General Plan (County of Sonoma 2016). As a result, the County's scenic resource-related policies would not apply to the project site.

Sonoma County Municipal Code

The project site is a public project of the County and, pursuant to Sonoma County Municipal Code Section 26.02.070, the provisions of Chapter 26 do not apply to County public projects. Accordingly, the project site has no designations under the Sonoma County Municipal Code, and therefore development standards for specific zones which include regulations on lighting and other aesthetic impacts, would not be applicable to the proposed project.

Sonoma County Visual Assessment Guidelines

Developed in January 2019, the Sonoma County Visual Assessment Guidelines are an administrative procedure for the assessment of visual impacts in the preparation of Initial Studies and Environmental Impact Reports. The guidelines provide procedures to guide staff and consultants in preparing and analyzing visual impacts pursuant to CEQA. While the analysis of visual impacts involves qualitative judgements, the guidelines provide procedure intended to define a methodology that utilizes to the extent practicable, objective standards that can be described and utilized in a consistent manner.

Santa Rosa General Plan 2050

As described in Chapter 2, *Project Description*, the project site is not governed by the City of Santa Rosa's General Plan since it is County owned property. However, for informational purposes, the Santa Rosa General Plan includes several policies that address aesthetics through urban design, scenic preservation, and the visual character of the city. These include:

- **Policy 4-1.1:** Preserve and enhance the visual beauty and value of the city's natural waterways, hillsides, historic districts, buildings, structures, and landscapes.
- **Policy 4-1.2:** Strengthen and emphasize community focal points, visual landmarks, and features that contribute to the identity of Santa Rosa by applying the design concepts and standards of the Zoning Code, Design Guidelines, Historic Combining Districts, Bicycle and Pedestrian Plan, and the Citywide Creek Master Plan.
- **Policy 4-1.3:** Enhance and strengthen the visual quality of major entry routes into the city and major corridors that link neighborhoods with downtown.

Santa Rosa Municipal Code

As described in Chapter 2, *Project Description*, the project site is not governed by the City of Santa Rosa's Municipal Code since it is County-owned property. However, for informational purposes the Santa Rosa City Code (SRCC) includes several sections that regulate aesthetics in development, focusing on visual quality, compatibility, and environmental sensitivity. The SRCC includes various directives to minimize adverse impacts to visual resources in Santa Rosa. Provisions related to aesthetics and visual resources are included in Title 13, Streets, Sidewalks, and Public Places; Title 17, Environmental Protection; Title 18, Buildings and Construction; and Title 20, Zoning. Specifically, Section 20-30.080 provides regulations on outdoor lighting to minimize light trespass and ensure energy efficiency of fixtures while ensuring frequently-traveled areas are lit for safety.

4.1.3 Impact Analysis

a. Methodology and Significance Criteria

Methodology

The methodology described in the Sonoma County Visual Assessment Guidelines were used to analyze the potential aesthetic impacts of the project. Sonoma County prepared its Visual Assessment Guidelines to provide specific steps and criteria for evaluating aesthetic impacts of development throughout the County (County of Sonoma 2019). In brief, the procedure involves determining public viewing points and describing the existing setting for each site, reviewing photographs of the site to understand potential impacts, characterizing the site's sensitivity following the matrix offered in Table 4.1-1, and determining the potential visual dominance of the proposed project based on criteria described in table 4.1-2 below. As addressed in this analysis, aesthetics refers to visual impacts to the environment, both natural and built, and includes adverse changes that reduce visual quality along with potential increases in glare or light in a project area. Aesthetics or visual resource analysis assesses the visible change and anticipated viewer response to that change.

Visual simulations were prepared for the office site showing a conservative maximum size of six stories and massing of the proposed County buildings to help with the analysis. The simulations also show conceptual landscaping, the proposed surface parking and solar canopy, as well as removal of existing buildings on the project site.

Site Sensitivity

The visual sensitivity of the project site is rated based on the County's criteria in the Visual Assessment Guidelines that generally characterizes a site relative to its aesthetic value to the surrounding community (County of Sonoma 2019). This determination, then, considers both the site itself and the setting in which the site occurs. Criteria used to determine site sensitivity is presented in Table 4.1-1.

Table 4.1-1 Site Sensitivity

Sensitivity	Characteristics
Low	The site is within an urban land use designation and has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by urban development or the site is surrounded by urban zoning designations and has no historic character and is not a gateway to a community. The project site terrain has visible slopes less than 20 percent and is not on a prominent ridgeline and has no significant natural vegetation of aesthetic value to the surrounding community.
Moderate	The site or portion thereof is within a rural land use designation or an urban designation that does not meet the criteria above for low sensitivity, but the site has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by rural or urban development but may include historic resources or be considered a gateway to a community. This category includes building or construction sites with visible slopes less than 30 percent or where there is significant natural features of aesthetic value that is visible from public roads or public use areas (i.e. parks, trails etc.).
High	The site or any portion thereof is within a land use or zoning designation protecting scenic or natural resources, such as General Plan designated scenic landscape units, coastal zone, community separators, or scenic corridors. The site vicinity is generally characterized by the natural setting and forms a scenic backdrop for the community or scenic corridor. This category includes building and construction areas within the SR designation located on prominent hilltops, visible slopes less than 40 percent or where there are significant natural features of aesthetic value that are visible from public roads or public use areas (i.e. parks, trails etc.). This category also includes building or construction sites on prominent ridgelines that may not be designated as scenic resources but are visible from a designated scenic corridor.
Maximum	The site or any portion thereof is within a land use or zoning designation protecting scenic resources, such as General Plan designated scenic landscape units, coastal zone, community separators, or scenic corridors. The site vicinity is generally characterized by the natural setting and forms a scenic backdrop for a designated scenic corridor. This category includes building or construction sites within the scenic resource designation on or near prominent ridgelines, visible slopes greater than 40 percent or where there are significant natural features of aesthetic value that are visible from a designated scenic corridor.

Source: Sonoma County Visual Assessment Guidelines (County of Sonoma 2019)

OFFICE SITE

The office site is located within an urbanized area and contains a structure eligible for historic listing (see Section 4.4, *Cultural Resources)*. The site's urban context and lack of scenic protections generally align with a low sensitivity rating. However, a low sensitivity rating does not typically include historic resources. Therefore, the moderate sensitivity rating is used for this analysis as seen in Table 4.1-1

RESIDENTIAL SITE

The residential site is also located in an urbanized area and does not contain designated scenic resources. It does not contain historic structures but fronts Mendocino Avenue, a major public corridor. Based on the Visual Assessment Guidelines, the residential site has moderate sensitivity as seen in Table 4.1-1.

Visual Dominance

After the site sensitivity is determined, visual dominance is determined based on how prominent a project would be when developed. The development dominance criteria used in this analysis are based on the Sonoma County Visual Assessment Guidelines, as follows in Table 4.1-2.

Table 4.1-2 Visual Dominance

Sensitivity	Characteristics
Dominant	Project elements are strong – they stand out against the setting and attract attention away from the surrounding landscape. Form, line, color, texture, and night lighting contrast with existing elements in the surrounding landscape.
Co-dominant	Project elements are moderate – they can be prominent within the setting, but attract attention equally with other landscape features. Form, line, color, texture, and night lighting are compatible with their surroundings.
Subordinate	Project is generally not visible from public view because of intervening natural land forms or vegetation.
Inevident	Project is generally not visible from public view because of intervening natural land forms or vegetation.

Source: Sonoma County Visual Assessment Guidelines (County of Sonoma 2019)

OFFICE SITE

Visual simulations show the proposed five-story office building would be visible from multiple public viewpoints. The office building would be taller than existing structures but similar in scale to nearby civic buildings, including the state courthouse and the bank building near Bicentennial Way. Neutral colors and landscaping reduce contrast with the surrounding setting. Based on the dominance ratings in Table 4.1-2, the office site would appear co-dominant.

RESIDENTIAL SITE

Future residential development could include buildings up to seven stories along Mendocino Avenue, making them visible from public viewpoints. The scale and massing of these structures could alter the visual character of the corridor. Because design details are unknown, visual dominance cannot precisely be determined. However, taller buildings along a prominent street would result in a co-dominant presence.

Impact Determination

Based on the Visual Assessment Guidelines, the visual impact significance is determined by combining the sensitivity with the visual dominance evaluations such that higher levels of sensitivity and dominance combine to create significant impacts and lesser ones to create less than significant impacts, as seen in Table 4.1-3.

Table 4.1-3 Significance Matrix

Sensitivity	Dominant	Co-dominant	Subordinate	Inevident
Maximum	Significant	Significant	Significant	Less than significant
High	Significant	Significant	Less than significant	Less than significant
Moderate	Significant	Less than significant	Less than significant	Less than significant
Low	Less than significant	Less than significant	Less than significant	Less than significant

Source: Sonoma County Visual Assessment Guidelines (County of Sonoma 2019)

OFFICE SITE

Visual simulations show the proposed five-story office building would be visible from multiple public viewpoints. The office building would be taller than existing structures but similar in scale to nearby civic buildings, including the state courthouse and the bank building near Bicentennial Way. Neutral colors and landscaping reduce contrast with the surrounding setting. Based on the dominance ratings in Table 4.1-2, the office site would appear co-dominant.

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Significance Criteria

In accordance with Appendix G of the CEQA Guidelines, an impact related to aesthetics would be significant if the proposed project would:

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

b. Impact Analysis and Mitigation Measures

Threshold 1: Would the project have a substantial adverse effect on a scenic vista?

Impact AES-1 THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.1.1(a) and 4.1.1(c), the project site is not located within or adjacent to any scenic views or vistas, nor is it within any County-designated scenic resource areas (County of Sonoma 2016). Although the City of Santa Rosa General Plan identifies Highway 101 as a scenic roadway (City of Santa Rosa 2025), this designation is acknowledged for informational purposes only and does not constitute a significance criterion for this analysis. Nevertheless, views from and along the Highway 101 corridor were considered to evaluate the potential for the project to substantially degrade scenic resources visible from public viewpoints.

Office Site

The proposed office site would introduce a five-story office building and a single-story Emergency Coordination Center on a site that is currently developed and surrounded by existing urban uses. Although the proposed office building would be taller than most nearby structures, public views of

scenic resources (i.e., Taylor Mountain, Bennett Mountain) from the project site and its vicinity are already blocked by existing development and landscaping.

Highway 101 is located approximately 100 feet east of the easternmost edge site, separated by Administration Drive and stands of existing trees that provide a visual buffer between the site and the highway. The proposed office building would be up to five stories, which is substantially taller than the existing low-rise structures that would be removed as part of the project. However, the overall number of buildings on the site would decrease, and the new office building would appear visually consistent with other large civic structures nearby, including the recently constructed State courthouse, which is six stories tall and is currently the visually dominant building in the area. From Highway 101, the new office building would be partially visible but generally screened by existing trees along Administration Drive, which would remain unaffected by the proposed project. The proposed solar canopy over the site parking lots would have a lower profile than the proposed building and would thereby be obscured from view from the highway. Thus, views from Highway 101 would not be degraded by the proposed project.

The project would be viewed within an urbanized context where views of scenic resources are generally obscured by existing development and vegetation, and large civic and institutional buildings are common. Therefore, the proposed office site would not obstruct or degrade scenic views or vistas. This impact would be less than significant.

Residential Site

The proposed residential site would include the development of up to 1,500 units and approximately 20,000 square feet of retail/commercial uses on approximately 14.6 acres. Similar to the proposed office site described above, although the proposed residential development would be taller than most nearby structures, public views of scenic resources (i.e., Taylor Mountain, Bennett Mountain) from the project site and its vicinity are already blocked by existing development and landscaping. Residential buildings would be prominently visible from proximate areas to the north and west of the project site, such as Mendocino Avenue. However, Mendocino Avenue is an urban corridor characterized by institutional and commercial development and multi-story buildings, which is consistent with the proposed development.

Highway 101 is located approximately 750 feet west of the residential and retail/commercial site, separated by the office site, Administration Drive, and stands of existing trees that provide a visual buffer between the residential site and the highway. Existing development along Administration Drive and mature vegetation obscure potential views of the residential site from Highway 101. Thus, views from Highway 101 would not be degraded by the proposed project.

Therefore, the proposed residential site would not obstruct or degrade scenic views or vistas. This impact would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact AES-2 THE PROJECT SITE IS NOT LOCATED WITHIN A DESIGNATED STATE SCENIC HIGHWAY. THEREFORE, NO IMPACT WOULD OCCUR.

Overall Project (Office and Residential Sites)

As discussed in Section 4.1.1(b), the nearest State designated scenic highway is State Route 12, located approximately 6.4 miles east of the project site. Highway 101, located approximately 100 and 750 feet east of the office and residential sites, respectively, is eligible for listing but is not officially designated (Caltrans 2019). Intervening features (i.e., distance, development, topography, vegetation) obscure views of the project site from both highways. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

Threshold 3:	Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact AES-3 THE PROJECT WOULD NOT CONFLICT WITH APPLICABLE ZONING AND OTHER REGULATIONS GOVERNING SCENIC QUALITY, BUT MAY RESULT IN POTENTIALLY SIGNIFICANT IMPACTS RELATED TO VISUAL CHARACTER AS DEFINED BY THE COUNTY'S VISUAL ASSESSMENT GUIDELINES. IMPACTS ASSOCIATED WITH THE OFFICE SITE WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION MEASURE AES-1. HOWEVER, EVEN WITH IMPLEMENTATION OF MITIGATION MEASURE AES-1, IT IS CONSERVATIVELY ASSUMED THAT IMPACTS ASSOCIATED WITH THE RESIDENTIAL SITE WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.

As discussed in Section 4.1.3(b), *Methodology,* the project site is located in an urbanized area. Therefore, this analysis considers whether the project would conflict with applicable zoning and other regulations governing scenic quality. Additionally, consistent with the Sonoma County Visual Assessment Guidelines, this analysis also considers potential impacts to visual character and public views.

Consistency with Zoning and Scenic Quality Regulations

As discussed in Chapter 2, *Project Description*, under California Government Code Sections 53090 and 53091, cities and counties are exempt from complying with each other's building codes and zoning ordinances. Although the site is located within the City of Santa Rosa, the City's General Plan and zoning ordinances do not apply, and the site has no land use designation under the County's General Plan and is not part of a scenic resource area. Therefore, no conflicts with applicable zoning or other regulations governing scenic quality would occur.

Visual Character and Quality of Public Views

Office Site

As shown in Table 4.1-1, the office site has moderate visual sensitivity. Based on simulations included in Figure 4.1-1, the proposed office building would be co-dominant in Views 1 and 5 because the height and scale is similar to other large civic structures nearby, including the recently constructed state courthouse and a bank building near Bicentennial Way. Due to proximity and the size of the proposed structure, the proposed office building would be the dominant feature visible from View 2. The proposed office building would be taller than existing structures but would reduce the overall number of buildings on the site. As shown in Views 3 and 4, intervening vegetation would obscure most of the building, making it a subordinate feature of the view.

Based on the Visual Assessment Guidelines significance matrix shown in Table 4.1-3, the combination of moderate sensitivity and co-dominant or subordinate dominance results in a less than significant impact on public views. However, as shown in View 2, the massing and design of the proposed office building would potentially alter the visual character in the immediate surroundings of the project site. Therefore, impacts are considered potentially significant and Mitigation Measure AES-1 would be required.

Residential Site

Because the design and architectural details of the residential site are unknown at this time, visual simulations do not include these elements. The residential site would be highly visible from proximate areas to the north and east of the site and Mendocino Avenue. Future housing could include buildings up to seven stories, and while the Mendocino corridor is urbanized, the scale and massing of new residential structures could affect the visual character of the area. Future residential and retail/commercial development on the project site would be subject to project-specific environmental review which would include alignment with the Sonoma County Visual Assessment Guidelines. However, without completed project design, this analysis conservatively assumes that the residential site could substantially alter the visual character in the project vicinity. Therefore, impacts are considered potentially significant and Mitigation Measure AES-1 would be required.

Figure 4.1-1 Project View Simulations



View 1: Existing view from Mendocino Avenue at Chanate Road looking west.



View 1: Simulated view of proposed project.



View 2: Existing view from County Center Drive looking north.



View 2: Simulated view of proposed project.



View 3: Existing view from Nordyke Avenue near Young Drive looking northwest.



View 3: Simulated view of proposed project.



View 4: Existing view from Highway 101 looking northeast.



View 4: Simulated view of proposed project.



View 5: Existing view from Highway 101 looking southeast.



View 5: Simulated view of proposed project.

Mitigation Measures

AES-1 Context-Sensitive Design

The proposed office and the residential development shall be designed to maximize visual compatibility with surrounding land uses through context-sensitive massing, appropriate setbacks, and architectural articulation (e.g., varied rooflines, recessed façades, balconies, and material changes) that add texture and depth to publicly visible elevations. The design shall avoid large, unbroken wall planes facing public streets or open spaces.

To soften the visual impact of new structures, the proposed development shall incorporate perimeter setbacks, landscaping, and streetscape amenities (e.g., pedestrian-scale lighting, seating, and shade trees). Building placement and height shall be configured to preserve and frame public views of scenic features, where feasible. All exterior building materials, including glass and metal panels, shall have low reflectivity finishes (e.g., matte or textured surfaces, non-mirrored glass). Glazing shall incorporate low-emissivity (low-e) coatings or fritted glass to reduce solar reflectance, to the extent feasible.

A visual analysis shall be submitted to the Permit Sonoma Natural Resources Division with the final design package to demonstrate compliance with the Sonoma County Visual Assessment Guidelines.

Significance After Mitigation

Implementation of Mitigation Measure AES-1 would reduce visual impacts associated with the office site to a less-than-significant level. Because the office building has been conceptually designed and evaluated through visual simulations, incorporation of context-sensitive design features would ensure compatibility with surrounding development and avoid substantial degradation of public views or visual character. Impacts associated with the office site would be less than significant with mitigation.

For the residential site, Mitigation Measure AES-1 would require adherence to the Sonoma County Visual Assessment Guidelines and the use of design features intended to minimize visual effects. However, the absence of specific project design details introduces uncertainty regarding building massing, height, and visual prominence. Given that future development could include structures up to seven stories in height, there remains the potential for substantial changes to visual character and public views that cannot be fully mitigated at this stage. Accordingly, Mitigation Measure AES-1 would reduce impacts of the residential site of the project to the extent feasible; however, impacts would remain significant and unavoidable.

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

Impact AES-4 **THE OFFICE SITE WOULD NOT CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE THAT WOULD ADVERSELY AFFECT DAYTIME OR NIGHTTIME VIEWS IN THE AREA WITH IMPLEMENTATION OF MITIGATION MEASURES AES-1 AND AES-2. HOWEVER, LIGHT AND GLARE IMPACTS RESULTING FROM THE RESIDENTIAL SITE WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.**

As discussed in Section 4.1.1 (d), the project site is located in an urbanized area and experiences existing light and glare from roadway lighting, parking lot lighting, headlights from vehicles, and reflections from the windows, architectural coatings, glass, and other reflective surfaces on nearby buildings and cars parked along nearby roadways.

Office Site

While lighting details for the proposed office building are not available at this time, it is assumed that the proposed development would include interior and exterior lighting, safety lighting, and parking lot lighting typical of similar developments in the vicinity. As final lighting details are not complete at this time, it is conservatively assumed that the proposed office building could present a substantial additional source of light, and mitigation would be required.

The proposed office building would be up to five stories tall, substantially taller than the existing one-story structures to be removed. Increased building height could introduce additional glare, particularly from windows and building facades, visible from Highway 101 and proximate areas along Mendocino Avenue. The project would also include solar panels over the parking area, which may present additional sources of glare in the vicinity. Solar panels are designed to absorb sunlight and as a result they reflect the same amount of sunlight as water and less than soil or wood (National Renewable Energy Laboratory [NREL] 2018). Additionally, most commercial solar panels include anti-reflective coatings that further reduce glare (Law et al. 2023). Further, the solar panels would shade parked cars, reducing glare from vehicle surfaces and windshields. As final surfacing details are not complete at this time, it is conservatively assumed that the proposed office building could present a substantial additional source of glare, and mitigation is required.

With implementation of Mitigation Measures AES-1 and AES-2, the office site would have less than significant impacts related to light and glare.

Residential Site

The residential site would be similar in scale, massing, architectural character, and site layout to existing multifamily housing in the surrounding area. While the site is urbanized, the scale of new residential structures could introduce noticeable changes in light and glare.

Because detailed design information is not available at this time, this analysis conservatively assumes that the proposed residential site could present substantial additional sources of light and glare, and mitigation is required. However, even with implementation of Mitigation Measures AES-1 and AES-2, it is conservatively assumed that impacts would remain significant and unavoidable pending project-specific environmental review.

Mitigation Measures

AES-1 Context-Sensitive Design

See Mitigation Measure AES-1, ***Context-Sensitive Design***, under Impact AES-3, above.

AES-2 Lighting Design and Glare Minimization

Lighting for the proposed development shall be designed to utilize energy-efficient fixtures/lamps, such as high pressure sodium, hard-wired compact fluorescent, or other lighting technology that is of equal or greater energy efficiency. For safety and security, during business hours, all commercial areas shall be equipped with a lighting device providing a minimum one-foot candle of light at ground level during the hours of darkness. Lighting fixtures shall be shielded or recessed to reduce light trespass to adjoining properties, by:

1. Ensuring that the light source (e.g., bulb, etc.) is not visible from off the site; and
2. Confining glare and reflections within the boundaries of the site to the maximum extent feasible.

Each light fixture shall be directed downward and away from adjoining properties and public rights-of-way, so that no on-site light fixture directly illuminates an area off the site. No permanently installed lighting shall blink, flash, or be of unusually high intensity or brightness. Fixtures shall be controlled by timers or motion sensors to reduce unnecessary nighttime lighting, to the extent feasible.

Significance After Mitigation

Implementation of Mitigation Measures AES-1 and AES-2 would reduce light and glare impacts associated with the office site to a less-than-significant level. With implementation of these measures, the office site would be required to construct shielded, downward-directed lighting, reduce reflectivity of building materials, and incorporate energy-efficient fixtures and controls. Together, these requirements would minimize light spillover, glare visibility, and skyglow, ensuring that new sources of light and glare are consistent with the existing urban lighting environment and do not substantially affect surrounding land uses or public views. Impacts to light and glare associated with the office site would be less than significant with mitigation.

For the residential site, Mitigation Measures AES-1 and AES-2 would reduce potential light and glare effects through design standards and compliance with County lighting regulations. However, the lack of specific design details known at this time, coupled with the potential scale of residential development and proximity to sensitive receptors and public viewpoints, there remains the potential for substantial increases in nighttime lighting and glare which cannot be fully mitigated at this programmatic stage. Accordingly, impacts associated with the residential site are conservatively determined to be significant and unavoidable pending future project-specific environmental review.

Mitigation Measures AES-1 and AES-2 would reduce impacts to the extent feasible; however, impacts would remain significant and unavoidable.

4.1.4 Cumulative Impacts

Cumulative impacts consider impacts at the project site together with similar impacts of existing development, ambient growth, and the reasonably anticipated projects listed in Table 3-1 in Chapter 3, *Environmental Setting*. The projects listed in Table 3-1, in Chapter 3, *Environmental Setting,* represent development and redevelopment that will physically change the visual environmental setting in Santa Rosa, contributing to cumulative impacts. Cumulative impacts regarding aesthetics may occur if any of the related cumulative projects are located in close enough proximity to the project site to combine with the project and result in significant adverse changes in the aesthetics of the surrounding area.

Scenic Vistas

Cumulative development could result in substantial impacts to public views in the project vicinity. In particular, the 1650 West Steele Lane Project, 3575 West Mendocino Avenue Project, the project located on the corner of Morgan Street and College Avenue, 528 B Street Project, the Ridley Avenue and Wyngate Drive Project, and the Chanate Road and Cobblestone Drive Project could result in cumulative impacts due to their proximity to the project site or their location along the same major

arterial as the project site. As described in Impact AES-1, the project site is not near any scenic vistas, and the only public views in the area are of distant hillsides to the north and east. Due to the development of the area surrounding the project site, views of these hills are intermittent and fully obscured in some areas. Future development within the city in proximity to the project site would be required to comply with the Santa Rosa Design Guidelines, and General Plan policies which aim to preserve views of hillsides within the city and which would reduce impacts to scenic vistas. Therefore, cumulative impacts to scenic vistas would be less than significant, and as described in Impact AES-1, the proposed project would not result in a significant impact and would not contribute to any cumulative impact. As such, the proposed project would not result in a considerable contribution to a significant cumulative impact.

Scenic Highways

As discussed in Impact AES-2, the nearest designated state scenic highway is a portion of SR 12 which is approximately 6.4 miles east of the project site (Caltrans 2019). The nearest eligible scenic highway is a portion of Highway 101 which is approximately two miles south of the project site (Caltrans 2019). Additionally, the City of Santa Rosa designates Highway 101 as a locally designated scenic roadway within city boundaries. However, the City of Santa Rosa General Plan does apply to the proposed project and therefore does not establish applicable significance criteria for the proposed project. While the proposed project, and other nearby projects could result in a cumulative impact to Highway 101, none of the projects in proximity to the project site would be visible from a designated or eligible state scenic highway. Due to existing vegetation which acts as a screen between Highway 101 and the project site, the project would not significantly impact views from this roadway. Therefore, cumulative impacts to scenic highways would be less than significant, and as discussed in Impact AES-2, the proposed project would not result in a significant impact and would not contribute to any cumulative impact.

Compliance with Scenic Quality Regulations

Cumulative development would be constructed in compliance with regulations included in the Santa Rosa General Plan, the Santa Rosa Municipal Code, and the Santa Rosa Design Guidelines, which pertain to community character, design, and aesthetics. Existing regulations provide a framework for future development to enhance community cohesion and visual identity and ensure design compatibility. These existing regulations and design review processes would guide compatible design of cumulative development and ensure cumulative development has less than significant impacts related to conflict with applicable zoning and other regulations governing scenic quality. As discussed in Impact AES-3, the proposed project would comply with Sonoma County General Plan and the Sonoma County Visual Assessment Guidelines, which govern scenic quality and incorporate context-sensitive design (Mitigation Measure AES-1) to reduce scenic quality impacts to a less than significant level. However, it is conservatively assumed that potential visual character impacts associated with the future housing development would remain significant and unavoidable even with implementation of Mitigation Measure AES-1 and Mitigation Measure AES-2. All cumulative projects would be developed in accordance with their applicable local regulations and design guidelines related to community character, design, and aesthetics. Thus, while the proposed project would have significant and unavoidable impacts to visual character, the project's contribution to cumulative impacts would not be cumulatively considerable.

Light and Glare

Cumulative development within the City of Santa Rosa would contribute to an increase in light and glare. The Santa Rosa Municipal Code includes specific requirements related to light and glare, developed to minimize cumulative lighting and glare impacts. All projects in the area would be required to adhere to their applicable zoning and development regulations, General Plan and Santa Rosa Municipal Code, and design review to reduce impacts related to lighting and glare, or otherwise mitigate impacts on a project-by-project basis. As discussed in Impact AES-4, the proposed project is a County public project and is not subject to the City of Santa Rosa General Plan, Municipal Code, or design review requirements. Accordingly, light and glare impacts for the proposed project were evaluated based on project-specific design features, to the extent that information is currently available, and implementation of Mitigation Measures AES-1 and AES-2. With implementation of these measures, impacts related to light and glare associated with the office site would be reduced to less than significant levels. However, consistent with the project-level analysis, it is conservatively assumed that light and glare impacts associated with the future residential site could remain potentially significant and unavoidable due to the absence of detailed project design. Even if other cumulative projects in the area do not independently result in significant light and glare impacts, they would still contribute incremental light and glare effects in the surrounding area. When added to those incremental effects, the project's significant and unavoidable light and glare impact would be cumulatively considerable.

4.2 Air Quality

This section describes the affected environment and the regulatory setting for air quality and impacts on air quality from construction and operation of the proposed project, including impacts to nearby sensitive receptors and contributions to cumulative impacts. Construction and operational emissions associated with project buildout were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1 and proposed and net daily vehicle trips provided by Fehr and Peers in their Transportation Impact Analysis for the proposed project (Appendix B) as reported in Section 4.13, *Transportation*. Results of the calculations (refer to Appendix C) were compared to Bay Area Air District (Air District) thresholds to determine impacts. A construction health risk assessment (HRA) was conducted to estimate both off-site health risks to sensitive receptors, in accordance with the revised guidelines from the Office of Environmental Health Hazard Assessment (OEHHA) and the Air District guidelines. For health risk calculations, refer to Appendix D.

4.2.1 Setting

Climate and Topography

The project site is in the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of Air District. The SFBAAB is characterized by complex terrain, consisting of coastal mountain ranges, inland valleys, and bays, which distort normal wind flow patterns. The Coast Range splits resulting in a western coast gap, Golden Gate, and an eastern coast gap, Carquinez Strait, which allow air to flow in and out of the SFBAAB and the Central Valley. The climate is dominated by the strength and location of a semi-permanent, subtropical high pressure cell. During the summer, the Pacific high pressure cell is centered over the northeastern Pacific Ocean resulting in stable meteorological conditions and a steady northwesterly wind flow. Upwelling of cold ocean water from below to the surface because of the northwesterly flow produces a band of cold water off the California coast. The cool and moisture-laden air approaching the coast from the Pacific Ocean is further cooled by the presence of the cold water band resulting in condensation and the presence of fog and stratus clouds along the Northern California coast. In the winter, the Pacific high-pressure cell weakens and shifts southward resulting in wind flow offshore, the absence of upwelling, and the occurrence of storms. Weak inversions coupled with moderate winds result in a low air pollution potential (Air District 2022).

The nearest meteorological monitoring station to the project site is the Santa Rosa monitoring station. The warmest month of the year is August, and the coldest month of the year is January. The annual average maximum temperature is 71.4 degrees Fahrenheit (°F), while the annual average minimum temperature is 43.8°F. Rainfall is concentrated in the winter months. Local climate conditions are summarized below in Table 4.2-1.

Table 4.2-1 Santa Rosa Climate Conditions

Temperature Condition	Amount
Average annual rainfall	30.13 inches
Annual average maximum temperature	71.4°F
Annual average minimum temperature	43.8°F
Warmest month	August
Coolest month	January

°F = degrees Fahrenheit
Note: Averages are based on the record period from June 1, 1902 to January 31, 2013 at the Santa Rosa station.
Source: WRCC 2026

Air pollutant emissions in the SFBAAB are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are distributed widely and include those such as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be operated legally on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment such as when high winds suspend fine dust particles (Air District 2022).

Air Pollutants of Primary Concern

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, volatile organic compounds (VOC)/reactive organic gases (ROG),[1] nitrogen oxides (NO_X), particulate matter with diameters of up to ten microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO_X. Secondary pollutants include oxidants, ozone, sulfate and nitrate particulates (smog). The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

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

Ozone

Ozone (O_3) is a highly oxidative unstable gas produced by a photochemical reaction (triggered by sunlight) between NO_X and ROG. ROG is composed of non-methane hydrocarbons (with specific exclusions), and NO_X is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and NO_2. NO_X is formed during the combustion of fuels, while ROG is formed during the combustion and evaporation of organic solvents. As a highly reactive molecule, O_3 readily combines with many different atmosphere components. Consequently, high O_3 levels tend to exist only while high ROG and NO_X levels are present to sustain the O_3 formation process. Once the precursors have been depleted, O_3 levels rapidly decline. Because these reactions occur on a regional rather than local scale, O_3 is considered a regional pollutant. In addition, because O_3 requires sunlight to form, it mainly occurs in concentrations considered serious between April and October. People most at risk from O_3 include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers. In addition, people with reduced intake of certain nutrients, such as vitamins C and E, are at greater risk from O_3 exposure. Depending on the level of exposure, O_3 can cause coughing and a sore or scratchy throat; make it more difficult to breathe deeply and vigorously and cause pain when taking a deep breath; inflame and damage the airways; make the lungs more susceptible to infection; aggravate lung diseases such as asthma, emphysema, and chronic bronchitis; and increase the frequency of asthma attacks (USEPA 2026a).

Carbon Monoxide

Carbon monoxide (CO) is a localized pollutant found in high concentrations only near its source. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic's incomplete combustion of petroleum fuels. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. When CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease. These people already have a reduced ability to get oxygenated blood to their hearts in situations where they need more oxygen than usual. As a result, they are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina (USEPA 2026b).

Nitrogen Dioxide

The primary sources of NO_x are motor vehicles, industrial boilers, and furnaces. The principal form of NO_x produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2, commonly called NO_x. NO_2 is a reactive, oxidizing gas and an acute irritant capable of damaging cell linings in the respiratory tract. Breathing air with a high concentration of NO_2 can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases leading to respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma and children and the elderly are generally at greater risk for the health effects of NO_2. The nitrate particles that result from NO_X make the air hazy and difficult to see though. It can also contribute to the formation of O_3, smog, and acid rain (USEPA 2026c).

Sulfur Dioxide

SO_2 is the component of greatest concern and is used as the indicator for the larger group of gaseous sulfur oxides (SO_x). Other gaseous SO_x (such as SO_3) are found in the atmosphere at concentrations much lower than SO_2. The largest source of SO_2 in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities. Smaller sources of SO_2 emissions include: industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content. Short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult. People with asthma, particularly children, are sensitive to these effects of SO_2 (USEPA 2026d).

Particulate Matter

Suspended atmospheric PM_{10} and $PM_{2.5}$ are comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mist. Both PM_{10} and $PM_{2.5}$ are emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. The atmosphere, through chemical reactions, can form particulate matter. The characteristics, sources, and potential health effects of PM_{10} and $PM_{2.5}$ can be very different. PM10 is generally associated with dust mobilized by wind and vehicles. In contrast, $PM_{2.5}$ is generally associated with combustion processes and formation in the atmosphere as a secondary pollutant through chemical reactions. PM_{10} can cause increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling. For $PM_{2.5}$, short-term exposures (up to 24-hours duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases (USEPA 2026e).

Lead

Lead (Pb) is a metal found naturally in the environment, as well as in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial. However, due to the USEPA ’s regulatory efforts to remove Pb from gasoline, atmospheric Pb concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred before 1990 due to the removal of Pb from gasoline sold for most highway vehicles. Pb emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least partly due to national emissions standards for hazardous air pollutants (USEPA 2025). As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest Pb level in the air is generally found near Pb smelters. Other stationary sources include waste incinerators, utilities, and Pb-acid battery manufacturers. Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and cardiovascular system depending on exposure. Pb exposure also affects the oxygen-carrying capacity of the blood. The Pb effects most likely encountered in current populations are neurological in children. Infants and young children are susceptible to Pb exposures, contributing to behavioral problems, learning deficits, and lowered IQ (USEPA 2026f).

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, Toxic Air Contaminants (TAC) are a diverse group of airborne substances/air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. CARB has formally identified over 200 substances and groups of substances as TACs, including contaminants such as benzene, formaldehyde, lead, and asbestos (CARB 2026a). One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about $1/70^{th}$ the diameter of a human hair) and thus is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2026a). TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2026g).

Current Air Quality

The Air District operates a network of air quality monitoring stations throughout the SFBAAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and to determine whether ambient air quality meets the NAAQS and CAAQS.

The monitoring station closest to the project site is the Sebastopol monitoring station, located at 103 Morris Street in Sebastopol, approximately 6.6 miles northeast of the project site. The Sebastopol station collected 1-hour and 8-hour O_3, NO_2, and $PM_{2.5}$ concentrations between 2022 and 2024, which comprises the most current set of data for this monitoring station. There is no representative air monitoring station that collects PM_{10} data near the project site; therefore, it has been excluded from the table below.

Table 4.2-2 indicates the number of days that each of the federal and State standards has been exceeded at the monitoring station near the project site in each of the last three years for which data is available. As shown, the $PM_{2.5}$ federal standard was exceeded in 2023. No other State or federal standards were exceeded at the Sebastopol monitoring station.

Table 4.2-2 Annual Ambient Air Quality Data from Nearest Monitoring Stations

Pollutant	2022	2023	2024
Ozone (ppm), Worst 1-Hour	0.064	0.067	0.047
Number of days above CAAQS (>0.09 ppm)	0	0	0
Number of days above NAAQS (>0.12 ppm)	0	0	0
Ozone (ppm), Worst 8-Hour Average	0.055	0.051	0.043
Number of days above CAAQS (>0.070 ppm)	0	0	0
Number of days above NAAQS (>0.070 ppm)	0	0	0
Carbon Monoxide (ppm), Highest 8-Hour Average	0.8	0.7	0.7
Number of days above CAAQS or NAAQS (>9.0 ppm)	0	0	0
Nitrogen Dioxide (ppm), Worst 1-Hour	0.031	0.027	0.023
Number of days above CAAQS (>0.180 ppm)	0	0	0
Number of days above NAAQS (>0.100 ppm)	0	0	0
Particulate Matter <2.5 microns ($\mu g/m^3$), Worst 24 Hours	25.5	42.0	10.0
Number of days above NAAQS (>35 $\mu g/m^3$)	0	2	0

ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard

Note: Data sourced from the CARB at the Sebastopol monitoring station.

Source: CARB 2026b

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with a margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14, the elderly (over the age of 65), people engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. According to CARB, sensitive receptors include children, the elderly, and those with preexisting serious health problems. Land uses where sensitive receptors are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers and preschools, hospices, dormitories, prisons, nursing homes, hospitals, and residential communities (CARB 2005). Sensitive receptors nearest to the project site consist of single-family residences to the south side of the project site and Administration Drive, located along Major Drive and to the north along Russell Avenue; single-family residences along Lomitas Lane, as close as approximately 280 feet east of the eastern project boundary; multi-family residences to the north on Ventura Avenue and to the east of the project site along Chanate Road; Steele Lane Elementary School located approximately 1,200 feet to the south of the project site; and Rhio's Casa de Bambini Montessori Preschool & Daycare approximately 220 feet south of the project site.[2]

4.2.2 Regulatory Setting

The federal and state governments have authority under the federal and State CAA to regulate emissions of airborne pollutants and have established ambient air quality standards (AAQS) for the protection of public health. An air quality standard is defined as “the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without

[2] These distances are from property line to property line.

harming public health" (CARB 2026c). The USEPA is the federal agency designated to administer air quality regulation, while CARB is the state equivalent in California. Federal and state AAQS have been established for six criteria pollutants: O_3, CO, nitrogen dioxide, SO_2, PM_{10}, $PM_{2.5}$, and Pb, which can be harmful to public health and the environment. The CAA identifies two types of national ambient air quality standards. Primary standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings (USEPA 2026h). In addition, the State of California has established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards (CARB 2026d). The federal and California Clean Air Acts are described in more detail below.

a. Federal Regulations

The CAA was enacted in 1970 and amended in 1977 and 1990 (42 United States Code [USC] 7401) for the purpose of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, to achieve the purposes of Section 109 of the CAA [42 USC 7409], the USEPA developed primary and secondary NAAQS.

The primary NAAQS "in the judgment of the Administrator[3], based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health," and the secondary standards are to "protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" (42 USC 7409[b][2]). The USEPA classifies specific geographic areas as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with the NAAQS. States are required to adopt enforceable plans, known as a State Implementation Plan (SIP), to achieve and maintain air quality meeting the NAAQS. State plans also must control emissions that drift across state lines and harm air quality in downwind states. Table 4.2-3 lists the current federal standards for regulated pollutants.

To derive the NAAQS, the USEPA reviews data from integrated science assessments and risk/exposure assessments to determine the ambient pollutant concentrations at which human health impacts occur, then reduces these concentrations to establish a margin of safety (USEPA 2024h). As a result, human health impacts caused by the air pollutants discussed above may affect people when ambient air pollutant concentrations are at or above the concentrations established by the NAAQS. The closer a region is to attainting a particular NAAQS, the lower the human health impact is from that pollutant (San Joaquin Valley Air Pollution Control District 2015). Accordingly, ambient air pollutant concentrations below the NAAQS are considered to be protective of human health (CARB 2026e). The NAAQS and the underlying science that forms the basis of the NAAQS are reviewed every five years to determine whether updates are necessary to continue protecting public health with an adequate margin of safety (USEPA 2015).

[3] The term "Administrator" means the Administrator of the USEPA.

Table 4.2-3 Federal and State Ambient Air Quality Standards

Pollutant	NAAQS	CAAQS
Ozone	0.070 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.070 ppm (8-hr avg)
Carbon Monoxide	35.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)	20.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.100 ppm (1-hr avg) 0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.030 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg) 0.5 ppm (3-hr avg) 0.14 ppm (24-hr avg) 0.030 ppm (annual avg)	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)
Lead	0.15 μg/m^3 (rolling 3-month avg) 1.5 μg/m^3 (calendar quarter)	1.5 μg/m^3 (30-day avg)
Particulate Matter (PM_{10})	150 μg/m^3 (24-hr avg)	50 μg/m^3 (24-hr avg) 20 μg/m^3 (annual avg)
Particulate Matter ($PM_{2.5}$)	35 μg/m^3 (24-hr avg) 9 μg/m^3 (annual avg)	12 μg/m^3 (annual avg)
Visibility-Reducing Particles	No Federal Standards	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07 - 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape. (8-hr avg)
Sulfates	No Federal Standards	25 μg/m^3 (24-hr avg)
Hydrogen Sulfide	No Federal Standards	0.03 ppm (1-hr avg)
Vinyl Chloride	No Federal Standards	0.01 ppm (24-hr avg)

NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; ppm = parts per million; avg = average; μg/m^3 = micrograms per cubic meter

Source: USEPA 2025h

b. State Regulations

California Clean Air Act

The California Clean Air Act (CCAA) was enacted in 1988 (California Health & Safety Code [H&SC] §39000 et seq.). Under the CCAA, the State has developed the CAAQS, which are generally more stringent than the NAAQS. Table 4.2-3 lists the current State standards for regulated pollutants. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to the federal CAA, the CCAA classifies specific geographic areas as either “attainment” or “nonattainment” areas for each pollutant, based on the comparison of measured data within the CAAQS.

Toxic Air Contaminants

A TAC is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or which may pose a present or potential hazard to human health. TACs may result in long-term health effects such as cancer, birth defects, neurological damage, asthma, or genetic damage, or

short-term acute effects such as eye watering, respiratory irritation, runny nose, throat pain, and headaches. TACs are considered either carcinogenic or non-carcinogenic based on the nature of the health effects associated with exposure. For carcinogenic TACs, potential health impacts are evaluated in terms of overall relative risk expressed as excess cancer cases per one million exposed individuals. Non-carcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

TACs include both organic and inorganic chemical substances. One of the main sources of TACs in California is diesel engines that emit exhaust containing solid material known as DPM; however, TACs may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities.

In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: Health and Safety Code Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures, and provisions for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, California Senate Bill (SB) 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air quality monitoring network, and develop any additional air toxic control measures needed to protect children's health.

State Implementation Plan (SIP)

The SIP is a collection of documents that set forth a state’s strategies for achieving the AAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, and permitting), district rules, State regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under State law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the USEPA for approval and publication in the Federal Register. The items included in the California SIP are listed in the Code of Federal Regulations at 40 Code of Federal Regulations 52.220.

As the regional air quality management district, the Air District is responsible for preparing and implementing the portion of the SIP applicable to the portion of the SFBAAB within its jurisdiction. The air pollution control district for each county adopts rules, regulations, and programs to attain federal and State air quality standards and appropriates money (including permit fees) to achieve these objectives.

California Code of Regulations

The California Code of Regulations is the official compilation and publication of the regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act. They are compiled into Titles and organized into Divisions containing the regulations of state agencies. The following California Code of Regulations would be applicable to the proposed Project:

- **Engine Idling.** In accordance with section 2485 of Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- **Emission Standards.** In accordance with section 93115 of Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

NAAQS and CAAQS Attainment Status

California is divided geographically into 15 air basins for managing the air resources of the State on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality. If an air basin is not in either federal or State attainment for a particular pollutant, the basin is classified as a nonattainment area for that pollutant. Under the federal and State CAA, once a nonattainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant. To be redesignated, the area must meet air quality standards and have a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. Areas that have been redesignated to attainment are called maintenance areas.

The project site is within Sonoma County, which currently exceeds the NAAQS for 8 and 1-hour O_3, and $PM_{2.5}$. The SFBAAB, including Sonoma County, is currently classified as a nonattainment area under the CAAQS for O_3, $PM_{2.5}$, and PM_{10} (CARB 2023).

c. Local Regulations

Air Quality Management Plan

The Air District is responsible for assuring that the federal and State ambient air quality standards are attained and maintained in the Bay Area. The Air District is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, as well as many other activities.

The Air District adopted the 2017 Clean Air Plan (2017 Plan) as an update to the 2010 Clean Air Plan in April 2017. The 2017 Plan provides a regional strategy to protect public health and the climate. Consistent with the GHG reduction targets adopted by the state, the 2017 Plan lays the groundwork for a long-term effort to reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050 (Air District 2017). To fulfill state ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors—ROG and NO_X—and reduce transport of ozone and its precursors to neighboring air basins. The 2017 Plan builds upon and enhances the Air District's efforts to reduce emissions of fine particulate matter TACs (Air District 2017).

Air District Rules

The Air District implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects. Rules and regulations relevant to the project include the following:

- **Regulation 2 Permits, Rule 2 (New Source Review)**: This rule applies to all new or modified sources requiring a permit. This rule requires the analysis of new or modified sources to ensure that if emissions do exceed specific applicable thresholds that "Best Available Control Technology" is installed to limit the emissions to the greatest extent possible.
- **Regulation 8, Rule 3 (Architectural Coatings):** This rule limits the quantity of volatile organic compounds that can supplied, sold, applied, and manufactured within the Air District region.
- Regulation 9, Inorganic Gaseous Pollutants, Rule 8 (Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines): This rule limits the emissions of NOx and CO from stationary internal combustion engines with an output rated by the manufacturer at more than 50 brake horsepower. In addition, Section 9-8-330 states that an emergency standby engine cannot be operated for more than 50 hours in a calendar year for testing and maintenance purposes.

County of Sonoma General Plan

The County of Sonoma General Plan 2020 was amended in August 2016 and contains the following goals, objectives, and policies applicable to air quality issues related to the proposed project (County of Sonoma 2016):

Goal OSRC-16: Preserve and maintain good air quality and provide for an air quality standard that will protect human health and preclude crop, plant and property damage in accordance with the requirements of the Federal and State Clean Air Acts.

Objective OSRC-16.1: Minimize air pollution and greenhouse gas emissions.

Objective OSRC-16.2: Encourage reduced motor vehicle use as a means of reducing resultant air pollution.

Policy OSRC-16b: Encourage public transit, ridesharing and van pooling, shortened and combined motor vehicle trips to work and services, use of bicycles, and walking. Minimize single passenger motor vehicle use.

Policy OSRC-16i: Ensure that any proposed new sources of toxic air contaminants or odors provide adequate buffers to protect sensitive receptors and comply with applicable health standards. Promote land use compatibility for new development by using buffering techniques such as landscaping, setbacks, and screening in areas where such land uses abut one another.

Goal CT-1: Provide a well integrated and sustainable circulation and transit system that supports a city and community centered growth philosophy through a collaborative effort of all the Cities and the County.

Objective CT-1.4: Reduce the need for future automobile use by a combination of improvements and land development policies that give equal favor to alternate modes as to automobile use.

Objective CT-1.7: Reduce travel demand countywide by striving to provide a jobs/housing balance of approximately 1.5 jobs per household, and encourage creation of jobs and housing in urbanized areas along the SMART passenger rail corridor and other transit centers.

Policy CT-1b: Focus commute and through traffic onto Highway 101. Designate major arterial routes to serve primarily as connectors between urban areas.

Policy CT-1d: Work with the Cities to provide jobs, housing, shopping, and coordination of local transit along the SMART passenger rail corridor in order to reduce the need for automobile travel to and from work and shopping centers.

Policy CT-1d: Provide east west connectivity within each community, including interchange improvements, transit/rail stops, and pedestrian, bicycle, and other alternative transportation mode improvements that will improve access to Highway 101 and the rail/transit system.

Policy CT-1k: Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability.

Goal CT-2: Increase the opportunities, where appropriate, for transit systems, pedestrians, bicycling and other alternative modes to reduce the demand for automobile travel.

Objective CT-2.8: Provide bicycle and pedestrian links from bus stops and other transit facilities to residential areas, employment centers, schools, institutions, parks, and the greater roadway system in general, especially focusing on short trips that could result in a mode shift away from automobile travel.

Policy CT-2f: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system.

County of Sonoma Climate Resilience Comprehensive Action Plan

The County of Sonoma Climate Resilience Comprehensive Action Plan (Climate Plan) was approved in August 2024, which outlines the County intended path to reduce energy consumption from the County's operations and increase resilience to climate hazards that threaten Sonoma County. This Climate Plan aims to enable the County to achieve carbon neutrality by the year 2030. The following strategies and measures are applicable to the project (County of Sonoma 2024).

Energy

Measure E-CO-5: Minimize energy use and maximize resilience in new County Facilities by developing energy policies.

Measure E-CO-6: Minimize energy use and maximize resilience in the new County Government Center by following approved building energy design policies (E-CO-5), or by achieving LEED certification.

Measure E-CO-8: Reduce energy use and increase resilience in the mid-term by completing public lighting upgrades to high-efficiency systems.

Measure E-CO-9: Promote electric vehicle readiness.

Transportation

Measure T-CO-1: Decarbonize the County fleet of light duty vehicles by 2040.

Measure T-CO-5: Deploy zero emission vehicle infrastructure in number and locations to support the decarbonization schedule for light and heavy-duty fleets.

4.2.3 Impact Analysis

A project-level analysis is appropriate for the office site, as the specific planning, construction, and operational details can be evaluated. The project-level analysis evaluates the office buildings, including the Emergency Coordination Center and the Board of Supervisors chamber, with construction anticipated to begin as early as 2027.[4] A programmatic EIR analysis is suitable for the residential site because it is not yet a designed development project. Development of the residential site would occur in phases based on future applications and is expected to construct up to 1,500 units and 20,000 square feet of retail/commercial space. The residential site represents a conceptual program for future housing and is analyzed on a programmatic level.

a. Significance Thresholds

To determine whether a project would result in a significant impact to air quality, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would do any of the following:

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

Air District Regional Significance Thresholds

As stated in Section 2.0, *Project Description*, throughout this EIR, the project on the office site is analyzed at a project level. The project would also include up to approximately 1,500 residential units and 20,000 square feet of commercial space over 14.6 acres. Throughout this EIR, the Residential site is analyzed on a programmatic level.

Office Site

The Air District's *2022 CEQA Air Quality Guidelines* are used in this analysis to evaluate air quality. Table 4.2-4 shows the significance thresholds for construction and operational-related criteria air pollutant and precursor emissions being used for the purposes of this analysis. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions. For the purposes of this analysis, the project would result in a significant impact if construction or operational emissions exceed thresholds as shown in Table 4.2-4.

[4] Modeling was based on preliminary data and assumes that construction would start in 2026, which is conservative because the model assumes that construction equipment and vehicles become more efficient over time.

Table 4.2-4 Air District Air Quality Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (pounds per day)	Average Daily Emissions (pounds per day)	Maximum Annual Emissions (tons per year)
ROG	54	54	10
NO_X	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10

ROG = reactive organic gases, NO_X = nitrogen oxides, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter;

Source: Air District 2023

Residential Site

The Air District's quantitative thresholds would apply directly only to the project-level office development. However, emissions associated with both the project-level office development and the program-level residential and retail/commercial uses were modeled together to evaluate the maximum potential emissions associated with full buildout of the project site. This approach provides a conservative estimate of emissions from the proposed project.

Carbon Monoxide

Air District provides a preliminary screening methodology to conservatively determine whether a proposed project would exceed carbon monoxide thresholds. If the following criteria are met, a project would result in a less than significant impact related to local carbon monoxide concentrations:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Toxic Air Contaminants

Air District has established the following thresholds of significance for local community risks and hazards associated with TACs and $PM_{2.5}$ for assessing individual project-level impacts at a local level (Air District 2023):

- Not to exceed an increased cancer risk of >10 in one million.
- Not to exceed increased non-cancer (i.e., Chronic or Acute) risk of >1.0 Hazard Index.
- Not to exceed ambient $PM_{2.5}$ concentration increase >0.3 micrograms per cubic meter ($\mu g/m^3$) annual average.

A project would have a cumulatively considerable impact if the aggregate total of current and proposed TAC sources within a 1,000 feet radius of the project fence line in addition to the proposed project would exceed the following thresholds of significance:

- Not to exceed an increased cancer risk of >100 in one million.
- Not to exceed increased non-cancer (i.e., Chronic or Acute) risk of >10 Hazard Index.
- Not to exceed ambient $PM_{2.5}$ concentration increase >0.8 $\mu g/m^3$ annual average.

Alternatively, a project that demonstrates compliance with an adopted Qualified Community Risk Reduction Plan may be found to have a less than significant impact, even if the above thresholds are met. Conversely, for projects in areas where a Community Risk Reduction Plan has been adopted, inconsistency with the Community Risk Reduction Plan would demonstrate a significant impact.

Odor Sources

The Air District provides minimum distances for siting of new odor sources as shown in Table 4.2-5. A significant impact would occur if the project would result in other emissions (such as odors) affecting substantial numbers of people or would site a new odor source within the specified distances of existing receptors.

Table 4.2-5 Air District Odor Source Thresholds

Odor Source	Minimum Distance for Less than Significant Odor Impacts (in miles)
Wastewater treatment plant	2
Wastewater pumping facilities	1
Sanitary Landfill	2
Transfer Station	1
Composting Facility	1
Petroleum Refinery	2
Asphalt Batch Plant	2
Chemical Manufacturing	2
Fiberglass Manufacturing	1
Painting/Coating Operations	1
Rendering Plant	2
Coffee Roaster	1
Food Processing Facility	1
Confined Animal facility/feed lot/diary	1
Green Waste and Recycling Operations	1
Metal Smelting Plants	2

b. Methodology

The following section describes the methodologies used in this technical analysis to conduct emissions calculations as well as air dispersion modeling and health risk assessment calculations for offsite sensitive receptors. Impacts from the U.S. Highway 101 (Highway 101) on potential future residences are also analyzed in this report, with methodology details provided in this section.

Criteria Pollutant Emissions

The project's construction and operational emissions were estimated using CalEEMod Version 2022.1. CalEEMod uses project-specific information, including the project's land uses, square footages for different uses, and location, to estimate a project's construction and operational emissions. Detailed modeling assumptions and modeling outputs are included in Appendix E.

Construction Emissions

The project includes one office building, a single-story structure to house the Emergency Coordination Center (ECC), covered surface parking with a solar microgrid, and up to 1,500 residential units and 20,000 square feet of retail/commercial space. The project would involve the construction of an approximately 250,000 square foot office building. The office building would collectively house up to approximately 1,200 full-time employees and result in a net new 18 employees, and the retail/commercial component would result in roughly 32 new employees to the project site. In total, the project would accommodate only approximately 50additional employees over existing conditions. An additional single-story structure would house the 7,000 to 13,000 gross square foot ECC. Throughout this EIR, the project on the office site is analyzed at a project level. The project would also include up to approximately 1,500 residential units and 20,000 square feet of retail/commercial space over 14.6 acres. The residential site is analyzed on a programmatic level throughout this EIR.

Features would be incorporated into the project design to ensure the office site and residential site are integrated across the project site. Amenities including common open space, pedestrian walkways, and covered parking with a solar microgrid would be provided for future office employees and residents.

The proposed project would involve the demolition of five existing buildings on the project site (which were constructed in the 1960s), including Permit Sonoma at 2550 Ventura Avenue (31,400 gross square feet, single story), Human Services Building at 2550 Paulin Drive (42,000 gross square feet, two stories), Administration Building at 575 Administration Drive (46,900 gross square feet, single story), Fiscal Building at 585 Fiscal Drive (35,600 gross square feet, single story), and the Law Library/Registrar of Voters Building at 2604 Ventura Ave and 435 – 455 Fiscal Drive (29,600 gross square feet).[5]

Construction of the office site would be phased to construct new facilities on unoccupied property and minimize disruption to ongoing County operations. No temporary office space will be needed for those buildings to be demolished. Phased construction may follow the proposed order or a similar order:

1. Demolish the Fiscal Building
2. Build an approximately 250,000 square foot office building
3. Demolish Administration Building and replace with parking
4. Demolish Law Library / ROV Building and replace with parking.
5. Demolish Permit Sonoma
6. Build one megawatt solar micro-grid over covered parking area
7. Demolish Human Services building
8. Build a 7,000-13,000 square foot Emergency Coordination Center

[5] Modeling also included demolition of the Redwood Building at 370 Administration Drive based on preliminary data received.

In addition to the construction schedule for County facilities described above, construction on the Residential site would occur in phases dependent on the timing of development applications for the residential site. The phased approach to residential construction on the residential site is anticipated to result in the development of 1,500 residential units by 2029 and 20,000 square feet of retail/commercial space.

Construction emissions modeled include emissions generated by construction equipment used on-site and emissions generated by vehicle trips associated with construction, such as worker and truck delivery trips. CalEEMod estimates construction emissions by multiplying the amount of time equipment is in operation by emission factors. Construction would commence in 2027 at the earliest.[6] Construction is anticipated to occur Monday through Friday, with equipment operating for up to 8 hours per day. CalEEMod defaults for horsepower and load factors were used.

Project construction assumes that any excavated soils would be balanced on-site (i.e., no export of materials). This analysis assumes that the project would comply with all applicable regulatory standards. In particular, the project would comply with Air District Regulation 8 Rule 3 for architectural coatings.

Operational Emissions

The proposed project would include development of an office building, with buildout anticipated to occur by 2029, and residential and retail/commercial components, with buildout anticipated to occur by 2031.[7] The project would generate operational emissions from both indirect and direct sources, including building energy usage, area sources (like consumer products) and mobile sources. The project is assumed to include one 2,000 kilowatt (kW) backup diesel generator on-site, which would be operated in the event of a utility failure. Stationary source emissions associated with the operation of the backup diesel generator were calculated based on CalEEMod defaults and Air District's annual operation of the generator limit. Generator emissions are quantified in an in-house spreadsheet.

Operational stationary source modeling relied on the following assumptions:

- **Maintenance Testing**. The generator would have maintenance testing performed throughout the year. To account for criteria pollutant emissions generated during maintenance testing activities, it was assumed that the backup diesel generator would be operated for up to 100 hours per year, the maximum allowed operational time under Air District stationary source permits and pursuant with Air District Regulation 9, Rule 8. Per Air District guidance, daily emissions were calculated based on a maximum usage of two hours per day and 100 hours per year for maintenance testing and emergency use.
- **Emergency Usage.** Criteria pollutant emissions were not calculated for emergency use scenarios such as a power failure, as Air District stationary source permitting exempts emergency use.

[6] Modeling assumes that construction would start in 2026, based on preliminary data received. Construction activities with a later start date than 2026 would generate lower emissions, due to CalEEMod emissions factors accounting for the state's initiative for cleaner equipment fleet (i.e., each subsequent year assumes lower emission factors for each construction equipment). Therefore, because construction would occur at a later date than 2026, this analysis and the CalEEMod modeling upon which it is based provide a conservative assumption.

[7] The operational modeling assumes buildout of the residential site, commercial uses, and the office building in 2029, the year of completion of the office building. Because CalEEMod operational emission factors account for progressively cleaner vehicle fleets, energy sources, and regulatory standards over time, project operations commencing after the buildout year of 2029 would result in lower operational emissions.

Toxic Air Contaminants

Construction Phase

CARB's Air Quality and Land Use Handbook: A Community Health Perspective (April 2005) recommends against siting sensitive receptors within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. While these siting distances are not particular to construction activities, the primary source of TAC emissions from both freeways and construction equipment is DPM. Therefore, for projects within 1,000 feet of sensitive receptors a refined health risk would be conducted. The nearest sensitive receptor is a single family residence located approximately 150 feet south of the project boundary; therefore, an HRA was prepared to evaluate construction TAC impacts. Construction emissions rates were based on anticipated maximum daily emissions modeled using the CalEEMod version 2022.1. CalEEMod differentiates between particulate matter emitted from engine exhaust (i.e., DPM) and particulate matter emitted from ground disturbing activities (i.e., fugitive dust, which does not constitute DPM) (CAPCOA 2022). DPM concentration was estimated based on the PM_{10} exhaust emissions (not including fugitive PM_{10}) provided by CalEEMod, which are DPM emissions resulting from combustion of diesel-fueled vehicles and off-road equipment during construction. PM_{10} exhaust is composed of DPM and other air toxics; therefore, PM_{10} exhaust is a conservative estimate for DPM emissions estimates.

The purpose of this HRA is to determine the potential for construction to pose health risks to nearby sensitive receptors. This HRA estimates health risks associated with temporary emissions of TACs during construction of the project; specifically, construction activities would require the use of diesel-fueled heavy equipment and trucks, which would result in emissions of DPM. Dispersion modeling was performed using the USEPA-approved American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) with meteorological data from the representative Air District monitoring station located near the project site. Sonoma County Airport is the nearest representative air monitoring station with meteorological data and is approximately 5 miles northwest of the project site. The project used NED GeoTiff digital terrain files for terrain data at resolution of 1 arc-second (10 meters). Vehicle exhaust emissions sources for the project were located on the project site corresponding to the areas of construction. The project would be constructed in a single phase and modeled as one area source in AERMOD, with an assumed release height of five meters, corresponding to the approximate height of off-road equipment mufflers from which exhaust emissions would be released (SCAQMD 2008). Line volume sources were used to represent the construction haul route. The presence of buildings and other structures disturbs downwind air flow. However, building downwash is only calculated for point sources and not appropriate to include in AERMOD for this HRA because there are no point sources in the analysis. AERMOD provides the concentration estimated by the air quality model based on an emission rate of one gram per second (OEHHA 2015). Construction emissions would not be generated during nighttime hours; therefore, the dispersion modeling allocates the emissions during active construction hours, approximately 9 hours per day between Monday to Friday. Following Air District guidance, the urban dispersion option was applied using an estimated population of 485,375 for Sonoma County (Census Reporter 2024). AERMOD was used to model 611 receptors representing existing sensitive receptors within 1,000 feet of the project site.

Operational Phase

Health impacts associated with TACs are generally due to long-term exposure. Typical sources of TACs include industrial processes such as petroleum refining operations, commercial operations such as gasoline stations and dry cleaners, and diesel exhaust. Air District recommends that lead agencies should review risks from nearby roadways, freeways, and stationary sources for new receptor projects (Air District 2022a). The project would include one backup diesel generator, which is considered a typical source of TAC emissions and is analyzed for its potential health risk impacts on nearby sensitive receptors. Furthermore, the receptors of the proposed Residential site are within 1,000 feet of the Highway 101 Freeway.

STATIONARY SOURCE HEALTH RISK IMPACTS

Per guidance in Appendix E of Air District's *CEQA Air Quality Guidelines* (2022a), for new sources there is no project radius recommended. Rather the location of the maximum risk, hazard, and $PM_{2.5}$ concentration from the new source affecting a receptor should be identified. Air District considers sensitive receptors to be people occupying or residing in residential dwellings, schools, daycares, hospitals, and senior-care facilities. The nearest sensitive receptors to the stationary source located within the ECC are the residences along Major Drive located approximately 650 feet south of the ECC. As recommended by the Air District *CEQA Air Quality Guidelines*, the estimated risk associated with sources permitted by Air District, such as the assumed backup diesel generator, should be evaluated first using a screening-level analysis. Air District *Health Risk Calculator* (Version 5) was used to calculate cancer risk, chronic hazard index, and $PM_{2.5}$ concentrations (Air District 2025) using the emissions data for the operation of the backup diesel generator for 100 hours per year.

A 2,000-kilowatt diesel generator is assumed to be used during emergency events. For emissions estimation purposes, it is conservatively assumed to operate for approximately 100 hours per year. Daily average DPM emissions and $PM_{2.5}$ emissions would be approximately 0.03 lbs./day. The emissions data was entered into the Health Risk Calculator and resulting risk was adjusted based on the maximum allowable distance modeled within the spreadsheet, which is limited to 300 feet (Appendix E).

FREEWAY OPERATIONAL HEALTH RISK IMPACTS

Although not required by CEQA, a Freeway HRA was included in this EIR to conduct a comprehensive evaluation of potential health impacts from freeway emissions on nearby residents. This approach aligns with CEQA's intent to identify and mitigate potential health risks, ensuring transparent communication of health impacts to the community. The traffic volume for Highway 101 was based on the California Department of Transportation (Caltrans) Performance Measurement System (PeMS) for the year 2024 for the freeway segment link nearest to the project site. The nearest northbound Highway 101 link is ID 409674 at the intersection of Steele Lane, and the nearest southbound Highway 101 link is ID 409720 at the intersection of Bicentennial Way. The PeMS data provides hourly flow rates aggregated for the freeway segments. The flow rates are presented as total traffic and total truck traffic values by hour for each day of 2024. The data was then aggregated to obtain average hourly flow rates for 2024.[8]

[8] Average hourly flow and other health risk calculations may be seen in Appendix D.

Diesel particulate matter (DPM) is the primary TAC of concern from mobile sources. Even though there are TACs associated with gasoline combustion from passenger vehicle traffic, health risk impacts are generally largely dominated from DPM emissions. Therefore, DPM was quantified using PM_{10} exhaust emission rates as the driver for potential cancer risk impacts. Similarly, $PM_{2.5}$ emissions were quantified for air dispersion modeling and comparison to the corresponding Air District thresholds; however, it also included fugitive dust $PM_{2.5}$ emissions.

Emission rates were obtained using CARB's onroad emission rates from the Emission Factor (EMFAC) 2025 model. Emission rates were obtained to match with the first year of each age bin associated with a health risk assessment (3rd Trimester, Ages 0-2, Ages 2-16, and Ages 16-30). The first operational year is expected to be in late 2028, with emission factors from this year used for the 3rd Trimester. Year 2029, year 2031, and year 2045 EMFAC2025 emission rates were used for the Ages 0-2, Ages 2-16, and Ages 16-30 age bins, respectively. Truck and passenger vehicle flow was estimated to grow at an annual rate of 1 percent and were estimated for each of the age bin years analyzed.

Emission rates for heavy-heavy duty (HHD) trucks travelling 55 miles per hour (mph) and passenger cars travelling 65 mph on Highway 101 near the project vicinity were obtained (CARB 2025). Trucks are required to travel at a maximum of 55 mph on California Highways, based on the California Vehicle Code (Caltrans 2025).

With all of the above information, DPM and $PM_{2.5}$ emission rates (in grams per second [g/s]) were calculated for each hour for each age bin for the freeway segments identified. The maximum emission rates for each were identified for use in air dispersion modeling. Hourly emission rates were then divided by the maximum hourly emission rate to develop hourly "scalars" for use as variable emission rates in air dispersion modeling. This expresses lower emission rates at hours when vehicles are traveling in much smaller amounts, like the middle of the night, when winds and air dispersion are also typically lower.

The segments of Highway 101 within half a mile of the project site were modeled as line-volume sources in AERMOD. The line-volume source is a line segment with adjacently configured volume sources to represent vehicle travel along the mainlines. The widths of the roadway segments were measured in Google Earth for the mainlines using guidance from the Air Districts' *Air Quality Guidelines Appendix E* (Air District 2023), diesel trucks traveling along Highway 101 were modeled at a height of four meters and a plume height (i.e., highest point exhaust emissions would reach before drifting downwind) of 6.8 meters. For $PM_{2.5}$, each source was duplicated with a release height of zero meters to account for emissions of fugitive dust, like from brake wear and tire wear.

AERMOD provides X/Q (CHI/Q = chi/q = χ/q) values, which are the unitized concentrations estimated by the air quality model based on an emission rate of one gram per second. This was used for cancer risk calculations. Actual emission rates of $PM_{2.5}$ were input into AERMOD. Variable Emissions for "By Hour-Of-Day" were implemented using the scalars calculated as discussed above.

Please refer to Appendix D for more information related to air dispersion modeling.

Risk Assessment Calculations

The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has to the substance. Dose is positively correlated with time, and a more extended exposure period would result in a higher exposure level for the maximally exposed individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure

occurs over a more extended period. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period. Health risk was calculated using in-house spreadsheets and is consistent with the *OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines: The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA 2015) and the Air District *Health Risk Assessment Modeling Protocol* (Air District 2020b). In accordance with the OEHHA Guidance, the inhalation pathway was evaluated for construction and operational related projects. For the inhalation pathway, the dose is directly proportional to the breathing rate. Air District recommends using high end breathing rates (95th percentile) for children from the 3rd trimester through age two, and 80th percentile breathing rates for all other ages for residential exposures (Air District 2020b). Once dose is calculated, cancer risk is calculated by accounting for cancer potency of the specific pollutant, age sensitivity, exposure duration, averaging time for lifetime cancer risk, and fraction of time spent at home (sensitive receptor). The cancer potency factor (CPF) is specific for each pollutant and is determined through peer-reviewed scientific studies. For example, the Scientific Review Panel recommends a CPF for DPM of 3.0×10^{-4} $(\mu g/m^3)^{-1}$ and a slope factor of 1.1 $(ppmday\text{-})^{-1}$.[9] The age sensitivity factors account for greater susceptibility in early life as compared to adult exposure, starting from the third trimester of pregnancy to 16 years. The fraction of time at home (FAH) takes into account the time actually residing at the sensitive receptor location. FAH also considers time spent at home for various age groups. For example, newborns are expected to reside at home for longer periods of time compared to school-age children, and the elderly (retirees) are expected to spend more time at home compared to people of working age. FAH consistent with OEHHA guidelines were used for the analysis. There is a school, Rhio's Casa de Bambini Montessori Preschool & Daycare, located within an isopleth of one in a million cancer risk. As a result, FAH was applied after 16 years old.

Outputs from the air dispersion modeling were used with the emission rates to determine ground level concentrations of DPM. Exposure durations for each age category, or age bin, were determined.[10] The exposure durations, in conjunction with the calculated ground level concentrations, inhalation dose risk factors and cancer potency factors DPM were used to calculate 30-year lifetime health risk as the modeled receptors. The maximally exposed individual resident (MEIR) is described below.

$PM_{2.5}$ concentrations are modeled and then compared to the Air District threshold for significance determinations. Figure 3 depicts the sources, sensitive receptors, and location of the MEIR to unmitigated $PM_{2.5}$ impacts. Additional post-processing was performed to account for the removal efficiency of DPM and $PM_{2.5}$ via MERV filtration to calculate mitigated health risk for cancer, chronic and $PM_{2.5}$ impacts to onsite sources.

Please refer to Appendix D for more information related to health risk assessment calculations.

Cumulative Health Risk

Appendix E of Air District's CEQA Air Quality Guidelines (2022a) also recommends assessing cumulative impacts of a new source or sources in combination with existing sources located within 1,000 feet of the project site. Because health risk focuses on sensitive receptors, cumulative impacts to the maximally exposed impacted receptor (MEIR), the residences adjacent to the southern boundary of the project site, were analyzed. The cumulative risk analysis addresses the construction

[9] CPF and slope factors are built into the HARP2 model used for quantifying risk.
[10] Age bins for this analysis are 3rd trimester through 0, ages 0 through 2, and ages 2 through 16.

and operation of the proposed project, all existing sources within a 1,000-foot radius of the MEIR and the health risk and $PM_{2.5}$ concentration associated with roadway traffic on the Highway 101. Within 1,000 feet of the MEIR, there are four stationary sources, which are identified with their facility name, number, and distance from the MEIR (Air District 2026):

- Inmate Connector (202490; ~415 feet north);
- Safeway Inc #1576 (23113; ~800 feet southeast);
- Kaiser Foundation Hospital (5178, ~975 feet north);
- Steele Lane Shell (112306-1; ~1,000 feet southwest)

c. Project Impacts and Mitigation Measures

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

Impact AQ-1 THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE 2017 CLEAN AIR PLAN WITH IMPLEMENTATION OF MITIGATION MEASURES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

The California CAA requires that air districts create a Clean Air Plan that describes how the jurisdiction will meet air quality standards. The most recently adopted air quality plan is the Air District 2017 Clean Air Plan (2017 Plan). The 2017 Plan builds upon and enhances the Air District's efforts to reduce emissions of fine particulate matter and TACs. The 2017 Plan does not include control measures that apply directly to individual development projects. Instead, the control strategy includes control measures related to stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants.

The 2017 Plan focuses on two paramount goals, both consistent with the mission of Air District:

- Protect air quality and health at the regional and local scale by attaining all national and state air quality standards and eliminating disparities among Bay Area communities in cancer health risk from TACs.
- Protect the climate by reducing Bay Area GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.

Under Air District's methodology, a determination of consistency with the 2017 Plan should demonstrate that a project:

- Supports the primary goals of the air quality plan.
- Includes applicable control measures from the air quality plan.
- Does not disrupt or hinder implementation of any air quality plan control measures.

A project that would not support the 2017 Plan's goals would not be consistent with the 2017 Plan.

Overall Project

On an individual project basis, consistency with Air District quantitative thresholds is interpreted as demonstrating support for the Clean Air Plan's goals. As described above, the Air District's quantitative thresholds apply directly to the project-level office development. However, emissions from both the project-level office component and the program-level residential component were

modeled together to represent full buildout conditions at the project site. This approach ensures that the analysis captures the maximum potential emissions that could result from the proposed project.

As shown in the response to Threshold 2 (Table 4.2-7 and Table 4.2-8), construction of the proposed project would not exceed Air District thresholds for criteria pollutants. However, as shown in Table 4.2-8, operation of the proposed project would result in an exceedance of Air District thresholds for ROG.

As shown in Table 4.2-6, both the office site and the residential site would include applicable control measures from the 2017 Plan and would not disrupt or hinder implementation of such control measures. However, as shown in Table 4.2-8, project operations would result in an exceedance of the Air District threshold for ROG and project impacts related to consistency with the 2017 Plan would be potentially significant.

Table 4.2-6 Project Consistency with Applicable Control Measures of 2017 Plan

Control Measure	Evaluation
TR9: Bicycle and Pedestrian Access and Facilities. Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	**Consistent**. Both the office site and the residential site would be required to incorporate both short-term and long-term bicycle parking facilities on-site to comply with CALGreen standards. These features will be confirmed and integrated into the project once the design details are finalized.
EN2: Decrease Electricity Demand. Work with local governments to adopt additional energy-efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.	**Consistent**. Both the office site and residential site would be required to comply with all energy efficiency standards of the latest Title 24 (including the California Energy Code and CALGreen). The Title 24 standards are updated every three years, however, AB 130 places a six year pause on new state and local residential building code updates, effective January 1, 2026. Because the project's building permit will occurr after January 1, the proposed project is subject to the 2022 California Building Standards. These standards would incorporate energy efficient measures such as efficient lighting, heating, and solar photovoltaic systems, which supports the 2017 Plan control measure to decrease electricity demand.
BL1: Green Buildings. Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for on-site renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	**Consistent**. The proposed project would include covered surface parking with a solar microgrid. In addition, both the office site and the residential site would be required to comply with the latest iteration of the Title 24 Building Efficiency Standards. The CALGreen standards are also updated every three years and become increasingly more stringent over time. However, AB 130 places a six year pause on new state and local residential building code updates, effective January 1, 2026. Because the project's building permit will occurr after January 1, the proposed project is subject to the 2022 California Building Standards. Thus, the residential uses would be required to comply with the 2022 California Building Standards, which would still support reduced building emissions as a result of the proposed project. For example, the proposed project would also include all-electric appliances for the residential and retail/commercial land uses. In addition, the proposed project would require a minimum 65 percent diversion of construction/demolition waste, use of low pollutant emitting exterior and interior finish materials, and dedicated circuitry for electric vehicle charging stations.

Control Measure	Evaluation
BL2: Decarbonize Buildings. Explore potential Air District rulemaking options regarding the sale of fossil fuel-based space and water heating systems for both residential and commercial use. Explore incentives for property owners to replace their furnace, water heater or natural-gas powered appliances with zero-carbon alternatives. Update Air District guidance documents to recommend that commercial and multi-family developments install ground source heat pumps and solar hot water heaters.	**Consistent**. Both the office site and residential site would involve development of all-electric buildings, which prohibits the use of natural gas-powered appliances. In addition, the office site and residential site are required to comply with all energy efficiency standards of the latest Title 24 (including the California Energy Code and CALGreen). The Title 24 standards are updated every three years and become increasingly more stringent over time. However, AB 130 places a six year pause on new state and local residential building code updates, effective January 1, 2026. Because the project's building permit will occur after January 1, the proposed project is subject to the 2022 California Building Standards. The residential uses would be required to comply with the 2022 California Building Standards and would include all-electric appliances for the residential and retail/commercial land uses. Furthermore, the project site is also equipped with Sonoma Clean Power (SCP) infrastructure, allowing tenants to choose CleanStart or EverGreen service options, which provide approximately 88 percent or 100 percent carbon free electricity, which supports the 2017 Plan control measure to decarbonize buildings.
WR2: Support Water Conservation. Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	**Consistent**. Both the office site and residential site would be required to comply with all water conservation standards of CALGreen that are in effect at that time, by installing water-efficient features, including high-efficiency low-flow fixtures, efficient water-heating systems, drought-tolerant landscaping, and high-efficiency irrigation.

Source: Air District 2017b

Mitigation Measure

Implementation of Mitigation Measure AQ-1 would reduce ROG emissions below the Air District thresholds for operation.

AQ-1 Operational Emissions Reduction

Prior to issuance of a certificate of occupancy, the following measures shall be incorporated into the project design and noted on all building and landscape maintenance plans:

- All interior and exterior paints, coatings, primers, and sealants used for the proposed project shall be zero-VOC with a maximum VOC concentration of 5 g/L to reduce VOC emissions. Documentation verifying VOC content shall be maintained and made available upon request.
- All janitorial and facility maintenance activities shall utilize zero or low-VOC cleaning supplies. These requirements shall be incorporated into building operations and maintenance procedures and included in janitorial service contracts.
- All landscape maintenance equipment utilized for ongoing operation of the project shall be electric-powered or battery-operated. The use of gasoline-powered landscaping equipment shall be prohibited for routine landscape maintenance activities including, but not limited to, lawn mowers, weed whackers, and leaf blowers.

These requirements shall be incorporated into the project's operational policies and any applicable service contracts. Documentation demonstrating compliance with these requirements shall be made available upon request.

Significance After Mitigation

Implementation of Mitigation Measure AQ-1 would reduce the proposed project's ROG emissions through project design features. Accordingly, impacts would be less than significant with mitigation.

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

Impact AQ-2 PROJECT CONSTRUCTION AND OPERATION WOULD RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE FOR ROG, WHICH THE PROJECT REGION IS IN NON-ATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD. HOWEVER, WITH MITIGATION INCORPORATED, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The office site and residential site were modeled together to evaluate the maximum potential emissions associated with full buildout of the project site. Modeling the combined development program provides a conservative estimate of emissions from the proposed project.

Overall Project

Construction Emissions

Construction activities associated with development of the office building, emergency coordination center, surface parking with a solar micro-grid, retail/commercial uses, and residential portions of the project would temporarily generate emissions associated with equipment and fugitive dust. Construction emissions modeled include emissions generated by construction equipment used on the site and emissions generated by vehicle trips associated with construction, such as worker and vendor trips. Table 4.2-7 summarizes the estimated maximum daily average emissions of ROG, NO_X, CO, PM_{10} exhaust, $PM_{2.5}$ exhaust, and sulfur oxide (SO_x) during project construction. As shown in Table 4.2-7, project construction emissions for all criteria pollutants would be below the Air District average daily thresholds and therefore would be less than significant.

Table 4.2-7 Project Construction Emissions

	Average Daily Emissions (pounds per day)[1]					
	ROG	NO_X	CO	SO_X	PM_{10} (exhaust)	$PM_{2.5}$ (exhaust)
Construction Year 2026	8	7	8	<1	<1	<1
Construction Year 2027	3	11	27	<1	<1	<1
Construction Year 2028	51	8	23	<1	<1	<1
Maximum Daily Emissions	51	11	27	<1	<1	<1
Air District Thresholds	54	54	N/A	N/A	82	54
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**No**	**No**

Source: See CalEEMod worksheets in Appendix E Numbers may not add up due to rounding.

N/A = not applicable (no Air District threshold for CO or SO_X)

[1] Construction modeling assumes implementation of Air District BMPs.

The Air District does not have quantitative thresholds for fugitive dust emissions during construction. Instead, the Air District recommends Best Management Practices (BMPs) be implemented to reduce construction-related fugitive dust emissions. Sonoma County requires projects to implement BMPs consistent with the Air District *Basic Best Management Practices for Construction-Related Fugitive Dust Emissions*, which are included in Mitigation Measure AQ-2. With the implementation of Mitigation Measure AQ-2, construction air quality impacts would be less than significant.

Operational Emissions

Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment) and mobile sources (i.e., vehicle trips to and from the project site). Long-term emissions associated with project operation, including the office building, emergency coordination center, retail/commercial uses, and residential portions, are shown in Table 4.2-8.

As seen in Table 4.2-8, the net project operational emissions would exceed the Air District's ROG emissions thresholds. Therefore, the project would potentially violate an air quality standard or result in a cumulatively considerable net increase in criteria pollutants and impacts would be potentially significant.

Table 4.2-8 Project Operational Emissions

	Average Daily Emissions (pounds per day)					
Sources	**ROG**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Existing Emissions						
Mobile[1]	0	0	0	0	0	0
Area	6	<1	4	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Total Existing Emissions	6	1	5	<1	<1	<1
Proposed Project Emissions						
Mobile[1]	23	16	127	<1	<1	<1
Area	47	1	48	<1	<1	<1
Energy	<1	6	3	<1	<1	<1
Stationary	1	1	3	<1	<1	<1
Total Project Emissions	72	24	181	<1	1	1
Net Project Emissions	**66**	22	176	<1	1	1
Air District Thresholds	54	54	N/A	N/A	82	54
Threshold Exceeded?	**Yes**	**No**	**N/A**	**N/A**	**No**	**No**
	Annual Emissions (tons per year)					
Existing Uses	1	<1	1	<1	<1	<1
Proposed Project	13	4	33	<1	<1	<1
Net Project Emissions	12	4	32	<1	<1	<1
Air District Thresholds	10	10	N/A	N/A	15	10
Threshold Exceeded?	**Yes**	**No**	**N/A**	**N/A**	**No**	**No**

Source: See CalEEMod worksheets in Appendix E. Numbers may not add up due to rounding.

N/A = not applicable (no Air District threshold for CO or SO_X)

[1] 7,267 net new trips were assigned to the operational model.

Mitigation Measure

Implementation of Mitigation Measure AQ-1 (see Impact AQ-1, above) and AQ-2 (below) would address operational emissions and construction emissions associated with all future development under the proposed project.

AQ-2 Construction Fugitive Dust Reduction

The general contractor(s) for the proposed project shall implement the following measures to reduce fugitive dust emissions from construction per the Air District's guidelines for *Basic Best Management Practices for Construction-Related Fugitive Dust Emissions*:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- 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.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

These requirements shall be incorporated into the project's construction plans and any applicable service contracts.

Significance After Mitigation

Implementation of Mitigation Measure AQ-1 would require the use of zero-VOC paints and coatings, low-VOC cleaning products, and electric-powered landscape maintenance equipment during operation of the proposed project. Mitigation Measure AQ-2 would require implementation of Air District best management practices to reduce fugitive dust emissions from construction. As seen in Table 4.2-9, this mitigation measure would reduce ROG emissions below the Air District thresholds for operation. Therefore, the project would not violate an air quality standard or result in a cumulatively considerable net increase in criteria pollutants and impacts would be less than significant with mitigation incorporated.

Table 4.2-9 Project Operational Emissions with Mitigation Incorporated

Sources	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
	Average Daily Emissions (pounds per day)					
Existing Emissions						
Mobile[1]	0	0	0	0	0	0
Area	6	<1	4	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Total Existing Emissions	6	1	5	<1	<1	<1
Proposed Project Emissions with Mitigation Incorporated						
Mobile[1]	23	16	127	<1	<1	<1
Area	34	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Stationary	1	1	3	<1	<1	<1
Total Project Emissions	59	17	130	<1	1	1
Net Project Emissions	**53**	16	125	<1	1	1
Air District Thresholds	54	54	N/A	N/A	82	54
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**No**	**No**
	Annual Emissions (tons per year)					
Existing Uses	1	<1	1	<1	<1	<1
Proposed Project	11	3	24	<1	<1	<1
Net Project Emissions	**9.7**	3	23	<1	<1	<1
Air District Thresholds	10	10	N/A	N/A	15	10
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**No**	**No**

Source: See CalEEMod worksheets in Appendix E. Numbers may not add up due to rounding.

N/A = not applicable (no Air District threshold for CO or SO_X)

[1] 7,267 net new trips associated with the proposed project were assigned to the operational model.

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

Impact AQ-3 THE PROJECT WOULD NOT INCREASE CARBON MONOXIDE CONCENTRATIONS SUCH THAT IT WOULD CREATE CARBON MONOXIDE HOTSPOTS, AND CONSTRUCTION OF THE PROJECT WOULD NOT RESULT IN EMISSIONS OF TACS SUFFICIENT TO EXCEED APPLICABLE HEALTH RISK CRITERIA. THE PROJECT WOULD INVOLVE THE SITING OF A PERMITTED STATIONARY SOURCE OF TACS; HOWEVER, THIS WOULD NOT RESULT IN NEARBY SENSITIVE RECEPTORS BEING EXPOSED TO HEALTH RISKS IN EXCESS OF AIR DISTRICT THRESHOLDS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Carbon Monoxide Hotspots

A carbon monoxide hotspot is a localized concentration of carbon monoxide that is above a carbon monoxide ambient air quality standard. Localized carbon monoxide hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local carbon monoxide concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm (CARB 2016).

The Air District recommends comparing project's attributes with the following screening criteria as a first step to evaluating whether the project would result in the generation of carbon monoxide concentrations that would substantially contribute to an exceedance of the thresholds of significance. The project would result in a less than significant impact to localized carbon monoxide concentrations if:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads of highway, the regional transportation plans, and local congestion management agency plans.
2. Project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
3. Project-generated traffic would not increase traffic volumes at the affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass).

Overall Project (Office and Residential Components)

The proposed project would replace the existing office uses with a new office building, Emergency Coordination Center, surface parking with a solar micro-grid, 20,000 square feet of retail/commercial space, and 1,500 residential units. The project would generate 7,267 net daily trips. The closest major intersection to the project site is the west-side intersection of Guerneville Road and Highway 101 SB Ramps, which has a combined cumulative and project PM peak hour traffic count of 9,743 vehicles per hour (Fehr and Peers 2026). The intersection of Guerneville Road and Highway 101 SB Ramp is a bridge underpass and would be considered a roadway where vertical and/or horizontal mixing would be substantially limited. The project would not increase vehicle traffic at affected intersections to 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal mixing is limited. In addition, the SFBAAB has been designated attainment under both the national and California AAQS for CO. Therefore, the project would not have the potential to increase CO hotspots at nearby affected intersections.

Toxic Air Contaminants

Construction Impacts

Construction-related activities would result in temporary project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for demolition, site preparation, grading, building construction, paving, and other construction activities. DPM was identified as a TAC by CARB in 1998 (CARB 2022b).

Generation of DPM from construction projects typically occurs in a single area for a short period of time. Construction of the project would occur over approximately 2 years and 9 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual (MEI). The risks estimated for an MEI are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of

proposed construction activities (i.e., 33 months) is approximately nine percent of the total exposure period used for 30-year health risk calculations. Current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities, resulting in difficulties in producing accurate estimates of health risk (Air District 2022a).

The maximum daily PM_{10} emissions would range from less than 0.01 to 0.04 lbs/day of exhaust (DPM), with the maximum emissions occurring during site preparation and grading activities. These activities would last for approximately 76 days. PM emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less intensive construction equipment. While the maximum DPM emissions associated with site preparation and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. This would represent less than one percent of the total 30-year exposure period for health risk calculation.

In addition, the project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these requirements would minimize emissions of TACs during construction. Regardless, construction health risk is quantified in Table 4.2-10; as shown in the table, potential health risk for the MEIR would be below Air District significance thresholds. Therefore, project construction would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant.

Table 4.2-10 Construction Health Risk Assessment

Source	Excess Cancer Risk (per million)	Chronic Health Risk[1]	$PM_{2.5}$ µg/m^3 annual average
Residences along Major Drive	7.26	0.042	0.10
Air District Significance Threshold	>10	>1	>0.3
Threshold Exceeded?	No	No	No

$PM_{2.5}$ = particulate matter less than 2.5 microns in size; µg/m^3 = micrograms per cubic meter

[1] Noncancer health impacts are determined by dividing the airborne concentration at the receptor by the appropriate Reference Exposure Level (REL) for that substance. A REL is defined as the concentration at which no adverse noncancer health effects are anticipated. Because noncancer health impacts are assessed as the ratio of airborne concentration versus the REL, the resulting hazard index is unitless.

[2] There is no acute reference exposure level for diesel exhaust to calculate acute health risk. Furthermore, except for unusual circumstances of high exposure, Office of Environmental Health Hazard Assessment does not recommend acute analysis for DPM.

Source: Air District 2024, Rincon Consultants 2025. For health risk calculations, see Appendix D.

Operational Impacts

STATIONARY SOURCE IMPACTS

Project operation would include one backup diesel generator, which is considered a typical source of TAC emissions. Therefore, a screening analysis was conducted to determine the potential for health risk to nearby sensitive receptors located approximately 650 feet south of where the Emergency Coordination Center and generator would be located. The residences south of the project site along Major Drive are considered the MEI in this analysis.

Table 4.2-11 summarizes the results associated with operation of the generator for 100 hours at the nearest sensitive receptor considered the MEI in this analysis. As shown in Table 4.2-11, operation of the diesel generator for 100 hours per year would not result in an exceedance of Air District single source significance thresholds for excess cancer risk, chronic risk, and ground level $PM_{2.5}$ concentrations at the nearest sensitive receptors. Therefore, operational impacts would be below Air District's single-source significance thresholds, and the project's health risk impacts would be considered less than significant.

Table 4.2-11 Health Risks from Generator Operation (100 Hours Per Year at 650 feet)

Scenario	Excess Cancer Risk (per million)	Chronic Health Risk[1]	$PM_{2.5}$ µg/m³ annual average
Residences along Major Drive	3.3	0.001	0.004
Air District Significance Threshold	>10	>1	>0.3
Threshold Exceeded?	No	No	No

$PM_{2.5}$ = particulate matter less than 2.5 microns in size; µg/m³ = micrograms per cubic meter

[1] Noncancer health impacts are determined by dividing the airborne concentration at the receptor by the appropriate Reference Exposure Level (REL) for that substance. A REL is defined as the concentration at which no adverse noncancer health effects are anticipated. Because noncancer health impacts are assessed as the ratio of airborne concentration versus the REL, the resulting hazard index is unitless.

[2] There is no acute reference exposure level for diesel exhaust to calculate acute health risk. Furthermore, except for unusual circumstances of high exposure, the Office of Environmental Health Hazard Assessment does not recommend acute analysis for DPM.

Source: Air District 2023. For health risk calculations, see Appendix D.

HIGHWAY 101 HEALTH RISK ASSESSMENT

Health risks for 153 sensitive receptor locations distributed throughout the residential area of the project site were modeled. Each of these receptors represents a proposed location of residential structures to analyze potential health risk impacts to future onsite residents. Cancer, chronic, and $PM_{2.5}$ risks were determined for a 30-year residency scenario at all receptor locations. The highest risk level within the residential area was identified at the ground-level at a flagpole height of 1.5 meters. The highest risk level across the residential area is shown in Table 4.2-12. As shown in Table 4.2-12, the MEIRs would be exposed to a 30-year excess cancer risk that would not exceed the Air District recommended single source health risk thresholds for cancer, chronic, and $PM_{2.5}$.

Table 4.2-12 Potential Health Risks from Highway 101 at the Future Residences

Unmitigated Scenario	Highest Risk Level Location[1]
Cancer Risk	
Incremental Excess Cancer Risk	3.8 in one million
Air District Threshold	10 in one million
Threshold Exceeded?	**No**
$PM_{2.5}$	
Annual $PM_{2.5}$ Concentration	0.04 µg/m^3
Air District Threshold	0.3 µg/m^3
Threshold Exceeded?	**No**
Hazard Index (Chronic Risk)	
Hazard Index	<0.1
Air District Threshold	1
Threshold Exceeded?	**No**

[1] Based on 30-year resident exposure.

[2] Cancer risk with MERV-13 filters would be approximately 1.9 in one million, assuming a 50 percent reduction of DPM.

$PM_{2.5}$ concentrations were obtained from the AERMOD outputs.

See Appendix E for model outputs.

Cumulative Impacts

CUMULATIVE CONSTRUCTION (OFFICE AND RESIDENTIAL COMPONENTS)

Health risk analysis focuses on sensitive receptors, and the proposed project is located adjacent to residences to the south along Major Drive. The cumulative risk analysis includes the risk from the proposed project, from all existing sources within a 1,000-foot radius of the MEIR, and from the Highway 101 roadway analysis. Three receptors were selected to represent construction-related cumulative impacts, and the analysis applied the same methodology used in the Freeway HRA. Cumulative impacts from project construction within 1,000 feet of the project site are reported in Table 4.2-13. As shown in Table 4.2-13, cumulative sources of TACs would not result in an exceedance of annual $PM_{2.5}$ concentration, chronic or cancer health risks. Therefore, cumulative construction impacts would be less than significant.

Table 4.2-13 Construction Cumulative Health Risks within 1,000 Feet of the MEIR

Source	Excess Cancer Risk (per million)	Chronic Health Risk[1]	$PM_{2.5}$ µg/m^3 annual average
Project Construction	7.26	0.042	0.10
Kaiser Foundation Hospital	7.42	0.02	0.14
The Home Depot Store #1379	0.30	0.00	0.00
State of California Dept of Justice	0.50	0.01	0.00
Inmate Connector	0.05	0.00	0.00
Roadway	3.8	0.1	0.04
Total Cumulative Risk	**19.1**	**0.17**	**0.28**
Air District Significance Threshold	>100	>10	>0.8
Threshold Exceeded?	No	No	No

$PM_{2.5}$ = particulate matter less than 2.5 microns in size; µg/m^3 = micrograms per cubic meter

[1] Noncancer health impacts are determined by dividing the airborne concentration at the receptor by the appropriate Reference Exposure Level (REL) for that substance. A REL is defined as the concentration at which no adverse noncancer health effects are anticipated. Because noncancer health impacts are assessed as the ratio of airborne concentration versus the REL, the resulting hazard index is unitless.

Source Air District 2025b, 2023. For health risk calculations, see Appendix D.

CUMULATIVE OPERATIONS (OFFICE AND RESIDENTIAL COMPONENTS)

Health risk analysis focuses on sensitive receptors, and the proposed project is located adjacent to residences to the south along Major Drive. The cumulative risk analysis includes the proposed project's 2,000 kilowatt backup diesel generator, located approximately 650 feet north of the sensitive receptors in the ECC, which would operate only during emergency utility outages and during limited routine testing and maintenance events. The cumulative risk analysis also includes exposure to DPM from trucks traveling along Highway 101, as well as stationary sources within a 1,000-foot radius of the MEIR. Cumulative impacts from project operation within 1,000 feet of the project site are reported in Table 4.2-14. As shown in Table 4.2-14, cumulative sources of TACs would not result in an exceedance of annual $PM_{2.5}$ concentration, chronic or cancer health risks cumulative significance thresholds with operation of the diesel generator for 100 hours per year. Therefore, cumulative operational impacts would be less than significant.

Table 4.2-14 Operational Cumulative Health Risks within 1,000 Feet of the MEIR

Source	Excess Cancer Risk (per million)	Chronic Health Risk[1]	$PM_{2.5}$ µg/m^2 annual average
Project Stationary Source Operation	3.3	<0.01	0.07
Sonoma County Facilities Development and Management Division	0.13	<0.01	0.0002
Sonoma County Refueling Facility	3.0	0.014	0
Roadway	20	0.01	0.3
Cumulative Total	**26.4**	**0.02**	**0.37**
Air District Significance Threshold	>100	>10	>0.8
Threshold Exceeded?	No	No	No

$PM_{2.5}$ = particulate matter less than 2.5 microns in size; µg/m^3 = micrograms per cubic meter

[1] Noncancer health impacts are determined by dividing the airborne concentration at the receptor by the appropriate Reference Exposure Level (REL) for that substance. A REL is defined as the concentration at which no adverse noncancer health effects are anticipated. Because noncancer health impacts are assessed as the ratio of airborne concentration versus the REL, the resulting hazard index is unitless.

Source Air District 2023, 2025. For health risk calculations, see Appendix D.

Mitigation Measure

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact AQ-4 THE PROJECT WOULD NOT GENERATE ODORS ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE DURING CONSTRUCTION OR OPERATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

The project would generate oil and diesel fuel odors during construction from equipment use. The odors would be limited to the construction period and would be temporary. With respect to operation, the Air District's *CEQA Air Quality Guidelines* (2022) identifies land uses associated with odor complaints which include, but are not limited to, wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. The proposed project would involve operation of office, retail/commercial, and residential uses, which are not identified on the list shown in Table 4.2-5. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people, and impacts would be less than significant.

Mitigation Measure

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.2.4 Cumulative Impacts

The geographic scope of the cumulative air quality analysis is the regional air basin, specifically the SFBAAB. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects within the County in addition to proposed plans. Because the SFBAAB is designated a nonattainment area for the federal and State one-hour and eight-hour ozone standards, State PM_{10} standards, and federal and State annual $PM_{2.5}$ standard, there is an existing adverse effect in the SFBAAB relative to these pollutants and additional, unplanned growth in the area has the potential to exacerbate the pollution and hinder the achievement of the NAAQS and CAAQS within the SFAAB. As identified in Table 3-1, *Cumulative Project List,* in Section 3.3, *Cumulative Development*, there are several planned and pending projects within one mile of the project site.

As described above under Impact AQ-1, both the office site and the residential site would be consistent with the 2017 Clean Air Plan. Specifically, as described in Impact AQ-2 above, the proposed project's daily emissions during construction and operation would not exceed Air District regional thresholds with mitigation incorporated. In addition, the proposed project would be consistent with the applicable control measures of 2017 Plan, by encouraging alternative modes of

transportation such as bicycling and walking, incorporating energy efficient appliances, and installing a solar microgrid onsite and water efficient appliances. Therefore, the project's contribution to cumulative air quality impacts due to a conflict with the 2017 Clean Air Plan would not be cumulatively considerable with implementation of Mitigation Measure AQ-1.

Each related project listed in Section 3, *Environmental Setting*, would generate emissions during construction and operation. However, Air District has determined that an individual project's contribution to the cumulative impact (non-attainment) is cumulatively considerable. As discussed above under Impact AQ-2, emissions from construction and operation of the proposed project, including those from the programmatic residential and commercial uses, would not exceed regional significance thresholds with mitigation incorporated. Therefore, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment.

Air District recommends evaluating cumulative impacts from TACs and $PM_{2.5}$ when a project is in areas with existing elevated background levels or near multiple emission sources. Projects may be considered to have a significant cumulative impact if the total cancer risk exceeds 100 in one million, a non-cancer hazard index that exceeds 10, or if $PM_{2.5}$ concentrations increase by more than 0.8 µg/m³ annually when combined with nearby sources. As shown under Impact AQ-3 and in Table 4.2-13 and Table 4.2-14, the proposed project and surrounding risk would not exceed Air District's cumulative threshold; therefore, the project's TAC emissions would not be cumulatively considerable.

As described under Impact AQ-4, construction of cumulative projects would result in construction equipment-related odors; however, the temporary nature of construction result in less than significant cumulative odor impacts. Operation of cumulative projects could adversely affect sensitive receptors from odor emissions if cumulative projects include typical odor-producing land uses. For the project, the uses at the office site and the Residential site would not be identified as odor producing facilities nor are there developments near the project site or included in the cumulative development list that would produce significant odors. Therefore, cumulative odors from the surrounding area from construction and operations would not combine at the same receptors, and the proposed project's cumulative contribution to cumulative odor emission impacts would not be considerable.

4.3 Biological Resources

This section evaluates the potential for significant impacts to biological resources resulting from the proposed project. The analysis in this section is based on a literature review and a site reconnaissance survey conducted by Rincon Consultants in August 2023.

4.3.1 Setting

The project site is currently developed and consists of County office buildings, paved parking lots, sidewalks, paths, a gravel parking lot, and landscaped areas. The project site is located within existing development and bounded by Highway 101 to the west, and commercial, industrial, and residential uses to the north and east. The project site is bounded to the south by Administration Drive, and Paulin Creek is located on the opposite side of Administration Drive.

a. Topography and Soils

The elevation of the site ranges from approximately 140 to 150 feet above mean sea level, and the topography is generally flat, and has been previously graded for development. The project site is within the *Santa Rosa, California* US Geologic Survey (USGS) 7.5-minute quadrangle.

The project site contains the following three soil map units (United States Department of Agriculture, Natural Resources Conservation Service [USDA, NRCS] 2023):

- **Alluvial land, Clayey:** A clay soil that occurs on floodplains and is formed in alluvium. A typical profile consists of clay loam from zero to 11 inches, stratified clay loam to clay from 10 to 30 inches, and stratified very gravelly sand to sand from 30 to 60 inches.
- **Clear Lake clay, sandy substratum, 0 to 2 percent slopes:** A poorly drained clay soil that occurs on basin floors. It is formed from basin alluvium derived from volcanic and sedimentary rock over fan alluvium derived from volcanic and sedimentary rock. A typical profile consists of clay from zero to 52 inches, clay loam from 52 to 60 inches, fine sandy loam from 60 to 72 inches, and stratified loamy coarse sand to clay loam from 72 to 84 inches.
- **Zamora silty clay loam, 0 to 2 percent slopes:** A well-drained soil that occurs on stream terraces and alluvial fans. It is formed from alluvium derived from volcanic and sedimentary rock. A typical profile consists of silty clay loam from zero to five inches, clay loam from five to 41 inches, sandy clay loam from 41 to 55 inches, and gravely clay from 55 to 60 inches.

These soils may be considered hydric where positive hydric soil indicators are present (e.g., redoximorphic concentrations, etc.).

b. Vegetation Communities and Land Cover Types

No natural vegetation communities were observed on the project site during the August 2023 field reconnaissance survey. The site is completely developed, with paved, gravel, and landscaped areas. Plant species observed during the reconnaissance survey are largely non-native and ornamental species such as amaryllis lily (*Amaryllis belladonna*), scarlet pimpernel (*Anagallis arvensis*), crape myrtle (*Lagerstroemia indica*), and glossy privet (*Ligustrum lucidum*).

c. Special-Status Biological Resources

Special-status biological resources include those plants, animals, vegetation communities, potentially jurisdictional aquatic features, and other sensitive biological resources that are governed under federal, State, and local laws and regulations. Information regarding the occurrences of special-status species in the vicinity of the project site was obtained from searching the California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database* (CDFW 2025a), the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) resource report (USFWS 2025a), and the California Native Plant Society (CNPS) *Online Inventory of Rare and Endangered Plants of California* (CNPS 2025). These database searches included the USGS 7.5-minute topographic quadrangle encompassing the project site (*Santa Rosa*), and the eight surrounding quadrangles (including *Healdsburg, Mark West Springs, Calistoga, Sebastopol, Kenwood, Two Rock, Cotati,* and *Glen Ellen*; 9-quad search).

Other resources included in the literature review include the *Technical Report – Sonoma County Habitat Conservation Plan: Preliminary Strategic Planning* (Sonoma 2020), *Biogeographic Information and Observation System* (CDFW 2025b), *Critical Habitat Portal* (USFWS 2025b), and the *National Marine Fisheries Service Critical Habitat Mapper* (NMFS 2025). These databases contain records of reported occurrences of federally or State listed endangered, threatened, rare, or proposed endangered or threatened species, state species of special concern, or otherwise sensitive species or habitat that may occur within the nine-quad search radius of the project site. This search range encompasses a sufficient distance to accommodate for regional habitat diversity and to overcome the limitations of the CNDDB, as the CNDDB is based on reports of positive detections and does not constitute an exhaustive inventory of every resource. Strictly marine, estuarine, and aquatic species were excluded from further analysis given the upland terrestrial nature of the project site. Plant species with specific habitat requirements absent at the site, such as vernal pools, alkali or serpentine soils, or higher elevation ranges, were also excluded from this analysis. The National Hydrography Dataset (NHD; USGS 2025) and National Wetlands Inventory (NWI; USFWS 2025c) were also reviewed to determine if any streams, wetlands, or other potentially jurisdictional aquatic features have been mapped on or adjacent to the project site. See Appendix F for detailed species lists.

Special-Status Species

Local, State, and federal agencies regulate special-status species and require an assessment of their presence or potential presence to be conducted prior to the approval of development of a property. Assessments of the potential for special-status species to occur included herein are based upon species known ranges, habitat preferences, occurrence records from the CNDDB in the project vicinity (CDFW 2025a). The potential for each special-status species to occur within the project site was evaluated according to the following criteria:

- **Not expected.** Habitat on and adjacent to the site is clearly unsuitable for the species' life history requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).
- **Low Potential.** Few of the habitat components meeting the species' requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site.

- **Moderate Potential.** Some of the habitat components meeting the species' requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found on the site.
- **High Potential.** All of the habitat components meeting the species' requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site.
- **Present.** Species is observed on the site or has been recorded (e.g., CNDDB, other reports) on the site recently (within the last 5 years).

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

- **Rank 1A:** Plants presumed extinct in California
- **Rank 1B.1:** Rare or endangered in California and elsewhere; seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
- **Rank 1B.2:** Rare or endangered in California and elsewhere; fairly endangered in California (20-80 percent occurrences threatened)
- **Rank 1B.3:** Rare or endangered in California and elsewhere; not very endangered in California (<20 percent of occurrences threatened, or no current threats known)
- **Rank 2:** Rare, threatened or endangered in California but more common elsewhere

Based on the query of the CNDDB (CDFW 2025a) and CNPS Online Inventory of Rare and Endangered Plants (CNPS 2025), there are 58 special-status plant species and 34 special-status wildlife species documented within the 9-quad/2-mile search radius of the project site (Appendix F).

Special-Status Plant Species

Fifty-eight special-status plant species documented in the CNDDB for the region were evaluated for their potential to occur within the project site (see Appendix F). None of these special-status plant species were observed during the site survey and none are expected to occur within the project site because the site is either outside of the species known range and/or elevation, there is a lack of natural vegetation communities on the site, the site is disturbed from development, or there is a lack of species-specific habitat requirements (e.g., vernal pools, native woodland, grassland and wetland communities, or serpentine or alkaline soil substrate).

Special-Status Wildlife Species

Thirty-four special-status wildlife species have been documented within the 9-quad/two-mile search radius in the CNDDB (see Appendix F). None of these special-status wildlife species were observed during the field reconnaissance survey. Special-status wildlife species in the vicinity of the project site are generally associated with grasslands, woodlands, riparian, and aquatic habitats. Because the site is developed and located within an urban area in the City of Santa Rosa, there is a lack of natural

habitat, high levels of human presence and developed areas surrounding the site; therefore, none of the 34 special-status wildlife species have more than a low potential to occur, and were eliminated from further evaluation.

Nesting Birds

Non-game migratory birds and native birds protected under section 3503 of the California Fish and Game Code (CFGC) and the federal Migratory Bird Treaty Act (MBTA) have the potential to breed and forage in the project site and vicinity. Species of birds that typically occur in the region, such as black phoebe (*Sayornis nigricans*), house finch (*Haemorhous mexicanus*), and mourning dove (*Zenaida macroura*) may nest in the vegetation and buildings in the project site, as well as on the ground.

Sensitive Natural Communities and Critical Habitat

Sensitive Natural Communities

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

Critical Habitat

No federally designated critical habitat occurs on the project site. The nearest critical habitat, for California tiger salamander (*Ambystoma californiense*), is approximately 2 miles northwest and southwest in the Santa Rosa Plain (USFWS 2025b, NMFS 2025).

Jurisdictional Waters and Wetlands

No potentially jurisdictional aquatic features are mapped by the NHD or NWI in the project site (USGS 2025, USFWS 2025c) and none were observed during the field survey. Paulin Creek flows just outside of the southern boundary of the site, on the opposite side of Administration Drive. In this area, Paulin Creek is a channelized creek that has been planted with natural vegetation to reestablish a relatively natural appearance (Santa Rosa 2013).

Wildlife Movement

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

Other corridors may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

Habitats within a habitat linkage do not necessarily need to be identical to those habitats being linked. Rather, the linkage needs only to contain sufficient cover and forage to allow temporary utilization by species moving between core habitat areas. Habitat linkages are typically contiguous strips of natural areas, though dense plantings of landscape vegetation can be used by certain disturbance-tolerant species. Some species may require specific physical resources (such as rock outcroppings, vernal pools, or oak trees) within the habitat link for the linkage to serve as an effective movement corridor, while other more mobile or aerial species may only require discontinuous patches of suitable habitat to permit effective dispersal and/or migration. Wildlife movement corridors may occur at either large or small scales. The California Essential Habitat Connectivity Project commissioned by the California Department of Transportation (Caltrans) and CDFW identifies "Natural Landscape Blocks" which support native biodiversity and the "Essential Connectivity Areas" which link them (Spencer et al. 2010).

No Natural Landscape Blocks or Essential Connectivity Areas occur within or in the immediate vicinity of the site and are largely restricted to undeveloped areas of the coastal range (CDFW 2025b). The project site is located adjacent to Paulin Creek; however, this waterway is not identified as a mapped wildlife migration corridor. Additionally, the project site is surrounded by development in the City of Santa Rosa and therefore does not function as a large- or small-scale corridor for wildlife migration.

4.3.2 Regulatory Setting

a. Federal Regulations

Endangered Species Act

Under ESA, authorization is required to "take" a listed species. Take is defined under ESA Section 3 as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Under federal regulation (50 Code of Federal Regulations sections 17.3, 222.102), "harm" is further defined to include habitat modification or degradation where it would be expected to result in death or injury to listed wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Critical habitat is a specific geographic area(s) that is essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. ESA Section 7 outlines procedures for federal interagency cooperation to conserve federally listed species and designated critical habitat.

Section 7(a)(2) of ESA and its implementing regulations require federal agencies to consult with USFWS or NMFS to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species, or result in the destruction or adverse modification of critical habitat. For projects where federal action is not involved and take of a listed species may occur, the project proponent may seek to obtain an incidental take permit under ESA Section 10(a). Section 10(a) allows USFWS and NMFS to permit the incidental take of listed species if such take is accompanied by a Habitat Conservation Plan that includes components to minimize and mitigate impacts associated with the take.

The USFWS and National Marine Fisheries Service share responsibility and regulatory authority for implementing ESA (7 United States Code [USC] section 136, 16 USC section 1531 et seq.).

Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act

The MBTA authorizes the Secretary of the Interior to regulate the taking of migratory birds. The act provides that it is unlawful, except as permitted by regulations, "to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, […] any migratory bird, or any part, nest, or egg of any such bird" (16 USC section 703[a]). In April 2025, the United States Department of the Interior issued Legal Opinion M-37085, which clarified that the intentional take of migratory birds is unlawful, but incidental take of migratory birds is not considered unlawful. The Bald and Golden Eagle Protection Act is the primary law protecting eagles, including individuals and their nests and eggs. USFWS implements the MBTA (16 USC section 703-711) and the Bald and Golden Eagle Protection Act (16 USC section 668). Under the Act's Eagle Permit Rule (50 Code of Federal Regulations section 22.26), USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

b. State Regulations

Endangered Species Act and Fully Protected Species

The CESA (CFGC section 2050 et seq.) prohibits take of State-listed threatened and endangered species without a CDFW incidental take permit. Take under CESA is restricted to direct harm of a listed species and does not prohibit indirect harm by way of habitat modification.

Protection of fully protected species is described in CFGC sections 3511, 4700, 5050 and 5515. These statutes prohibit take or possession of fully protected species. Incidental take of fully protected species may be authorized under an approved Natural Communities Conservation Plan or for select infrastructure related projects.

California Fish and Game Code Sections 3503, 3503.5 and 3511

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

California Fish and Game Code Sections 1360-1372

CFGC sections 1360 through 1372 comprise the Oak Woodlands Conservation Act. The act was enacted to protect oak woodland habitats that were being diminished by development, firewood harvesting, and agricultural conversions. The Oak Woodlands Conservation Program was established as a result of the act and is intended to provide project funding opportunities for private landowners, conservation organizations, and cities and counties to conserve and restore oak woodlands. The program authorizes the Wildlife Conservation Board to purchase oak woodland conservation easements and provide grants for land improvements and oak restoration efforts. *CEQA Guidelines* section 21083.4 requires counties to determine if a project within their jurisdiction may result in conversion of oak woodlands that would have a significant adverse effect on the environment. If the lead agency determines that a project would result in a significant adverse effect on oak woodlands, mitigation measures to reduce the significant adverse effect of converting oak woodlands to other land uses are required.

Native Plant Protection Act

The CDFW also has authority to administer the Native Plant Protection Act (CFGC section 1900 et seq.). The Native Plant Protection Act requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under Native Plant Protection Act section 1913(c), the owner of land where a rare or endangered native plant is growing is required to notify the department at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

Natural Communities Conservation Planning Act

The Natural Communities Conservation Planning (NCCP) Act was established by the California Legislature, is directed by the CDFW, and is implemented by the State, as well as public and private partnerships to protect habitat in California. The NCCP Act takes a regional approach to preserving habitat. An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. Once an NCCP has been approved, CDFW may provide take authorization for all covered species, including fully protected species, CFGC section 2835.

c. Local Regulations

Sonoma County General Plan 2020

The Sonoma County General Plan 2020 (Sonoma County 2008, amended 2016) includes policies to guide decisions on future growth, development, and conservation of resources through 2020. This includes the "Open Space and Resource Conservation Elements" which aims to preserve the natural and scenic resources that contribute to the general welfare and quality of life for the residents of the county and maintains its tourist industry. The Sonoma County General Plan contains the following goals and objectives related to biological resources:

Goal OSRC-7: Protect and enhance the County's natural habitats and diverse plant and animal communities.

Objective OSRC-7.1: Identify and protect native vegetation and wildlife, particularly occurrences of special-status species, wetlands, sensitive natural communities, woodlands, and areas of essential habitat connectivity.

Objective OSRC-7.7: Support use of native plant species and removal of invasive exotic species.

Policy OSRC-7k: Require the identification, preservation and protection of native trees and woodlands in the design of discretionary projects, and, to the maximum extent practicable, minimize the removal of native trees and fragmentation of woodlands, require any trees removed to be replaced, preferably on the site, and provide permanent protection of other existing woodlands where replacement planting does not provide adequate mitigation.

Policy OSRC-7o: Encourage the use of native plant species in landscaping. For discretionary projects, require the use of native or compatible non-native species for landscaping where consistent with fire safety. Prohibit the use of invasive exotic species.

Goal OSRC-8: Protect and enhance Riparian Corridors and functions along streams, balancing the need for agricultural production, urban development, timber and mining operations, and other land uses with the preservation of riparian vegetation, protection of water resources, flood control, bank stabilization, and other riparian functions and values.

Objective OSRC-8.3: Recognize and protect riparian functions and values of undesignated streams during review of discretionary projects.

Policy OSRC-8e: Prohibit, except as otherwise allowed by Policy OSRC-8d, grading, vegetation removal, agricultural cultivation, structures, roads, utility lines, and parking lots within any streamside conservation area. Consider an exception to this prohibition if:

(1) It makes a lot unbuildable and vegetation removal is minimized,

(2) The use involves the minor expansion of an existing structure where it is demonstrated that the expansion will be accomplished with minimum damage to riparian functions,

(3) The use involves only the maintenance or restoration of an existing structure or a nonstructural use,

(4) It can be clearly demonstrated through photographs or other information that the affected area has no substantial value for riparian functions, or

(5) A conservation plan is approved that provides for the appropriate protection of the biotic resources, water quality, flood management, bank stability, groundwater recharge, and other applicable riparian functions. Until the County adopts mitigation standards and procedures for specific uses and riparian functions, prior to approving the conservation plan, consult on areas of concern with the Resource Conservation District, Agricultural Commissioner, and resource agencies that are applicable to the proposed plan.

Policy OSRC-8i: As part of the environmental review process, refer discretionary permit applications near streams to CDFG and other agencies responsible for natural resource protection.

Sonoma County Code

Tree Protection Ordinance (Chapter 26)

The Sonoma County Tree Protection Ordinance, codified within Chapter 26 of the Sonoma County Code, establishes a regulatory framework to conserve native trees and woodland resources during development and land use activities. The ordinance applies to specified native tree species meeting minimum size thresholds (generally 6 inches diameter at breast height or greater) and requires discretionary approval for removal. Mitigation is required where removal cannot be avoided and may include on-site preservation, replacement planting, or payment of in-lieu fees based on the tree's value. Per section 26-02-070 of the County Code, Chapter 26 of the Sonoma County Code does not apply to this project.

Heritage and Landmark Tree Ordinance (Chapter 26D)

Chapter 26D of the Sonoma County Code provides additional protections for individual trees or groves that have been formally designated due to their historical, cultural, or biological significance. Under this ordinance, it is unlawful to remove, damage, or otherwise negatively affect a designated heritage or landmark tree without first obtaining a tree permit through a defined administrative

review process. Trees may be designated by the Board of Supervisors based on criteria such as age, size, rarity, or association with historic events, and the ordinance applies broadly to both public and private property within the County's jurisdiction. The ordinance defines actions that constitute "damage," including grading, soil compaction, or root disturbance within the dripline, thereby extending protection beyond direct removal. Per section 26-02-070 of the County Code, Chapter 26 of the Sonoma County Code does not apply to this project.

Water Efficient Landscape Ordinance (Sonoma County Code Chapter 7D3)

The Sonoma County Water Efficient Landscape Ordinance, codified in Chapter 7D3 of the County Code, establishes requirements for the design, installation, and maintenance of landscaping associated with development projects in order to promote water conservation and reduce waste. The ordinance implements the State Water Conservation in Landscaping Act and applies to new and rehabilitated landscape projects associated with discretionary approvals, including residential, commercial, industrial, and public development requiring building or grading permits. Projects subject to the ordinance must undergo a landscape plan check demonstrating compliance with standards for water use efficiency, including preparation of landscape and irrigation plans, verification of installation, and final inspection. The ordinance also requires soil preparation, mulching, and plant selection appropriate to site conditions, and prohibits invasive species.

City of Santa Rosa Municipal Code

While the County is not subject to the City's building and zoning laws, the County does intend, where appropriate and feasible, to work with the City to avoid land use conflicts. Accordingly, City of Santa Rosa regulations are provided for informational purposes.

Chapter 17-24 of the City of Santa Rosa Code contains requirements for the protection of heritage trees. The City of Santa Rosa requires a tree removal permit for the removal, pruning, or relocation of a heritage, protected, or street tree. A heritage tree is defined as a "tree or grove of trees so designated by a resolution of the Planning Commission" and "having a specific historical or cultural association or value due to its age, species, character, location, height and/or the circumstances of its planting or origin". The City further defines a heritage tree as trees native to the County which meet a species-specific diameter or circumference in size. The City identifies 16 native species and/or subspecies which are designated as heritage trees, including several subspecies of oaks (Quercus spp.). The City ordinance also requires that development plans include "the genus and species, the shape, the drip line and the trunk circumference of each tree and heritage tree", and must include trees where work is proposed under the dripline. Street trees are defined as tree growing within a planting strip or within any public right-of-way.

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds

The impact analysis below is based on the existing biological resources documented during the reconnaissance field survey and literature review described in Section 4.3.1 above.

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

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

b. Project Impacts and Mitigation Measures

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

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

Overall Project (Office and Residential Sites)

The literature review and database searches identified 58 special-status plant species and 34 special-status wildlife species that have the potential to occur within the nine-quad/two-mile search radius. None of these species are expected to occur within the project site because the site is either outside of the species known range and/or elevation, there is a lack of natural vegetation communities on the site to support the species, the site is disturbed from development, or there is a lack of species-specific habitat requirements. Therefore, the project site would not have a substantial adverse effect on special-status plant or wildlife species.

Non-game migratory birds and native birds protected by CFGC section 3503 and the MBTA could nest within existing trees, shrubs, and on buildings within or proximate to the office site and residential site. Some trees would be removed as a result of project implementation, which would impact nesting birds if active nests are present on site, through nest abandonment or destruction. Impacts could also occur if active nests are present in landscaped areas adjacent to active construction or staging through disturbance and nest abandonment. Destruction of nests or abandonment of nests by adult birds would be a potentially significant impact, and mitigation measures would be required.

Mitigation Measures

BIO-1 Nesting Bird Survey

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

Significance After Mitigation

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

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

Impact BIO-2 THE PROJECT WOULD NOT HAVE ADVERSE EFFECTS ON ANY SENSITIVE NATURAL COMMUNITY. THIS IMPACT WOULD LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

Results of the CNDDB query included four sensitive natural communities that occur in the 9-quad search radius; however, Coastal and Valley Freshwater Marsh, Northern Hardpan Vernal Pool, Northern Vernal Pool, and Valley Needlegrass Grassland are not present within or adjacent to the project site. Therefore, the overall project would not result in direct impacts to sensitive natural communities.

Although no sensitive natural communities occur within or adjacent to the project site, the project site's southern border is located adjacent to Paulin Creek. No project elements are planned within the riparian corridor of Paulin Creek and no riparian vegetation would be removed under the project. The creek and its riparian corridor are on the opposite side of Administration Drive from the project site. As described in Section 4.9, *Hydrology and Water Quality,* impacts associated with stormwater runoff would be minimized with adherence to existing state and local regulations. Therefore, the project would have a less than significant impact to riparian habitats or other sensitive natural communities.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant.

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

Impact BIO-3 THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON STATE OR FEDERALLY PROTECTED WETLANDS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

Based on the literature review and field visit conducted in August 2023, no wetlands or other potentially jurisdictional aquatic features occur within the project site. The nearest known wetland or other potentially jurisdictional aquatic feature is Paulin Creek, which is outside of the project site on the opposite side of Administration Drive from the project site.

No project elements are proposed within potentially jurisdictional areas of Paulin Creek. However, impacts to water quality could occur if stormwater runoff, sedimentation, and pollutants from construction were allowed to enter the creek. These impacts could degrade water quality and alter hydrologic conditions, potentially affecting sensitive aquatic habitats. As discussed in section 4.9 *Hydrology and Water Quality* the County would be required to comply with the *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), and Chapters 11 and 11A of the Sonoma County Code, which requires measures to reduce and eliminate stormwater pollutants, installation of appropriate Best Management Practices (BMP) to control stormwater runoff from construction sites, maintain or reduce stormwater runoff volumes and rates, and that grading and drainage permits be obtained prior to construction. The proposed project must comply with the low impact development (LID) Manual, which satisfies Order R1-2015-0030, NPDES Permit CA0025054 through the requirement of various low impact development measures. The NPDES permit for stormwater discharges also requires a Storm Water Pollution Prevention Plan (SWPPP). Grading and drainage plans accompanying the permit application must include BMPs for erosion prevention and sediment control, silt fencing at waterways and in sensitive areas, and limitation of disturbed areas through temporary features. The permit applications must also demonstrate compliance with NPDES MS4 permit provisions.

Compliance with the required regulations and policies above would reduce the potential for impacts to water quality from stormwater and other pollutants related to construction activities. Because violations of water quality standards would be minimized through existing regulations, impacts to potentially jurisdictional features from the project would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts would be less than significant.

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

Impact BIO-4 THE PROJECT WOULD NOT INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITE. THERE WOULD BE NO IMPACT.

Overall Project (Office and Residential Sites)

The project site is located within a developed and disturbed area with primarily landscaped ornamental vegetation. Land use in the vicinity is primarily residential or industrial with limited connectivity to natural habitats and is therefore not expected to support large-scale wildlife movement.

Although Paulin Creek could support movement of local species (i.e., deer, coyotes, non-special status fish species, etc.) between similar habitats, the project site itself does not contain natural areas that would serve as a migratory corridor or nursery site for wildlife. Temporary effects due to construction noise and increased human presence would not interfere substantially with these species ability to reproduce or forage over time. No impacts to wildlife movement corridors would occur as a result of project activities.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

No impact would occur.

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

Impact BIO-5 THE PROJECT WOULD NOT CONFLICT WITH ANY APPLICABLE LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES. NO IMPACT WOULD OCCUR.

Overall Project (Office and Residential Sites)

The project site is not subject to the County's Zoning Code and therefore would not result in conflict with the County's Zoning Code protecting trees. Sonoma County's Water Efficiency Landscape Ordinance (County Code Chapter 7D3) applies to projects with 5,000 square feet or more of new or modified landscaping or turf areas greater than 600 feet. Given that the overall project would include over 5,000 square feet of new/modified landscaping, the proposed project would be required to comply with this ordinance. The project would be required to prepare and implement water-efficient landscape design that meets County standards for plant selection, irrigation efficiency, and overall water use, including but not limited to installing efficient irrigation systems and limiting the use of high-water-demand landscaping features. Additionally, compliance would involve landscape plan review, inspection, and verification to ensure proper installation and ongoing adherence to water conservation measures.

With compliance with applicable existing County regulations, the overall project would not conflict with any applicable local policies or ordinances protecting biological resources. No impact would occur.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

No impact would occur.

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

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

Overall Project (Office and Residential Sites)

The project site is not located within the Santa Rosa Plain Conservation Strategy Area or any other Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan. Sonoma County is currently in the process of developing a County-wide HCP. However, the HCP is in the early initial phase of development to identify the HCP strategy and scope. Development of the HCP over four phases is expected to take up to three years but may take longer (Sonoma 2020). Therefore, there would be no impact.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

No impact would occur.

4.3.4 Cumulative Impacts

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

The planned and pending projects in the project vicinity are listed in Table 3-1 of Chapter 3, *Environmental Setting*. Cumulative development in the area could contribute to the loss of habitat for special-status species and the decline of special-status species, cause further fragmentation of habitat and isolation of populations, and decrease movement opportunities. Together, cumulative projects could result in the degradation of the suite of habitat types and associated biological resources, including special-status plant and wildlife species, that occur within the cumulative

setting and could result in overall diminished regional ecological functions and values. Impacts to biological resources would most likely be mitigated on a project-by-project basis. However, the proposed project would not result in permanent losses of sensitive habitats, including sensitive natural communities and listed species. Accordingly, the proposed project's contribution to cumulative impacts would not be cumulatively considerable.

The project would have a less than significant impact to riparian habitat and protected wetlands. The project would have no impact on wildlife movement corridors and would not conflict with applicable local policies, HCPs or NCCPs. The presence of mature trees on site could result in project-level impacts to nesting birds; however, Mitigation Measure BIO-1 would reduce this impact to a less than significant level. As such, the project’s contribution to cumulative impacts would not be cumulatively considerable.

4.4 Cultural Resources

This section describes the existing conditions, regulatory framework, and potential impacts related to historical resources, archaeological resources, and human remains. The analysis of cultural resources is based on the *Sonoma County Government Center Project Cultural Resources Technical Report* prepared by Rincon in support of the project in March 2025 and included the following: California Historical Resources Information System (CHRIS) and Native American Heritage Commission (NAHC) Sacred Lands File (SLF) searches, background research, archaeological and built environment pedestrian surveys, and the evaluation of nine historic-period properties and individual resources and as contributors to the potential Sonoma County Administrative Center District. The Cultural Resources Technical Report is included as Appendix G to this EIR.

4.4.1 Setting

Natural and Environmental

The project site lies in the Russian River Valley along an ephemeral drainage at an approximate elevation of 49 meters (160 feet) above mean sea level. None of the surrounding area retains its natural setting, with the project site located near a residential area characterized by a mix of single-family homes and apartment complexes and by a commercial area characterized by businesses. Vegetation within the vicinity of the site consists of ornamental trees, including low ground cover, consistent with urban environmental settings and has manicured landscapes.

Indigenous History

The project site lies within the traditional territory of the Southern Pomo people. Southern Pomo territory lies in Sonoma County, extending roughly from the coast at Gualala, east into Lake Sonoma and Cloverdale, and south covering the Russian River (McLendon and Oswalt 1978, 279). Southern Pomo is one of several distinct Pomoan language groups, including the Central, Northern, Eastern, Northeastern, Southern, Southwestern (Kashaya), and Southeastern (McLendon and Oswalt 1978, 274-275). The Southern Pomo territory is bordered by the Southwestern (Kashaya) to the west, the Wappo to the east, the Coast Miwok to the south, and the Central Pomo to the north (Native Land 2023). The word Pomo was taken from two Northern Pomo terms that were used interchangeably in English: *Po'-mo*, "red magnesite mine", and *Po'-ma*, "those who live at" or "people" (McLendon and Oswalt 1978, 277; Walker 2020, 1). Over time, *pomo* was used as the designation for the whole linguistic family.

As with the other Pomo language groups, the Southern Pomo were organized societies largely based on kinship, consisting of independent tribelets, or extended kin groups, ranging in size from 100 to 2,000 people (Bean and Theodoratus 1978: 293-294). Each extended kin group was composed of nuclear families averaging five to six persons and was led by a headman or minor chief, who, with other kin group chiefs, formed a council of principal ruling elite. Oftentimes the kin groups would join together to form a larger confederation for military purposes, electing one ruling "war chief."

Social status was based on family, background, wealth, and individual achievement (Bean and Theadoratus 1978, 294). Among the Southern Pomo, individuals held professional positions requiring apprenticeships, including chieftainship, shamanic roles, doctors, bead (money) making, hunting, and craftmaking. A highly respected and revered profession was the bear doctor, wielding special powers of healing and poisoning through religious and ritual paraphernalia.

Southern Pomo houses consisted of seasonal multifamily communal structures constructed of wooden frames and thatched with brush and grass or tule (Bean and Theadoratus 1978, 292; Walker 2020, 13-14) Other important structures include sweathouses and assembly or dance houses (Walker 2020, 14). The sweathouse, or men's house, was an earth covered conical structure. The dance house was a semi-subterranean with a center pole and smoke hole, tunnel entrance, and rear door, which averaged 70 feet in diameter (Bean and Theadoratus 1978, 293).

Southern Pomo subsistence was adapted to the environmental around them for which they based their patterns on hunting, gathering, and fishing, with acorns, grains, pepperwood nuts, and buckeyes as primary staples to be stored year-round (Bean and Theodoratus 1978: 290; Walker 2020, 13). Other important plant resources included berries and seeds. Big game included bear, deer, elk, and antelope, along with smaller game including rabbits and squirrels. Material culture included obsidian and chert tools, intricate basketry, and bone and shell implements (Bean and Theodoratus 1978: 291; Walker 2020, 14). The Southern Pomo participated in a shell bead exchange system internally and among other tribal groups (Bean and Theodoratus 1978: 298; Walker 2020, 14).

The Southern Pomo likely had their first contact with European culture upon the establishment of a settlement in California by the Russian fur traders at Fort Ross in 1811 (Kennedy 1955: 37; Walker 2020, 9). At the time of contact, the population of Southern Pomo is estimated at approximately 600 to 1,000 people in the greater Cloverdale area, with two large villages around Dry Creek comprising of 500 combined (Walker 2020, 9). Intermarriage between Russians and the Southern Pomo occurred, and the Southern Pomo language borrowed some Russian words (Walker 2020, 9-10). Spanish occupation began in 1821, and Mission Solano was established in 1823 with the forced labor of the Southern Pomo. Within a generation or two, direct conflict, slave labor, and exposure to European diseases nearly decimated them (Walker 2020, 10). In 1858, the Southern Pomo were forced onto the Round Valley reservation in Yuki territory, and in the 20th century, the Southern Pomo were granted official lands for rancherias, including Dry Creek and Graton in 1915, Mark West in 1916, Cloverdale in 1921, and Lytton in 1926/27 (Round Valley Indian Tribes 2023; Walker 2020, 12). Today, five Pomo-affiliated tribes within Southern Pomo territory are federally recognized, including the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Federated Indians Graton Rancheria, Lytton Rancheria, and Round Valley Indian Tribes of the Round Valley Reservation (NAHC 2023).

Spanish Period (1769-1822)

For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta (upper) California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968, Rolle 2003). In 1579, Francis Drake landed in what was most likely San Francisco Bay. In 1595, Sebastian Cermeño landed in Drake's Bay before returning south (Bean 1968).

Gaspar de Portolá and Franciscan Father Junípero Serra established the first Spanish settlement in Alta California at Mission San Diego de Alcalá in 1769. This was the first of 21 missions erected by the Spanish between 1769 and 1823. Portolá continued north, reaching the San Francisco Bay in 1769. Short on food and supplies, the expedition turned back to San Diego. In 1770, Pedro Fages began his expedition, reaching the San Francisco Bay Area and exploring the region in 1772 (Bean 1968).

In 1770, the mission and presidio at Monterey were founded and three years later Juan Bautista de Anza proposed to open a land route from Sonora to Monterey. The viceroy at the time, Antonio de

Bucareli, sanctioned Anza's expedition and proposed he extend it to form a settlement at the bay of San Francisco. Anza's first expedition traveled from Mexico City to Monterey. During this time, various sea expeditions from Monterey resulted in the discovery of Nootka Sound, the Columbia River, and the Golden Gate. Anza's second expedition began in 1775 and lead to the establishment of the presidio and Mission Dolores at San Francisco, (Bean 1968). Spanish colonial activity in the Bay Area concentrated on Mission Dolores and the presidio. Mission San Francisco Solano was founded in Solano during the Mexican Period, in 1823, and was the last California mission established (California Mission Resource Center 2016).

Mexican Period (1822-1848)

The Mexican Period commenced when news of the success of the Mexican Revolution (1810-1821) against the Spanish crown reached California in 1822. This period saw the privatization of mission lands in California with the passage of the Secularization Act of 1833. This Act enabled Mexican governors in California to distribute mission lands to individuals in the form of land grants. Successive Mexican governors made more than 700 land grants between 1822 and 1846, putting most of the state's lands into private ownership for the first time (Shumway 2006).

The Mexican Period saw an increased importance of sea trade and an influx of American settlers, which motivated the United States to expand its territory into California. The United States supported a small group of insurgents from Sonoma during the Bear Flag Revolt, during which the Bear Flaggers captured Sonoma in June 1846. The next month, Commodore John Drake Sloat landed in Monterey and proceeded to take Yerba Buena, Sutter's Fort, Bodega Bay, and Sonoma. Fighting between American and Mexican forces continued until Mexico surrendered in 1847 (Rolle 2003).

American Period (1848-Present)

The American Period officially began with the signing of the Treaty of Guadalupe Hidalgo in 1848, in which the United States agreed to pay Mexico $15 million for the conquered territory that included California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico, and Wyoming. Settlement of California continued to increase during the early American Period. Many ranchos in Sonoma County were sold or otherwise acquired by Americans, and most were subdivided into agricultural parcels or towns.

The discovery of gold in northern California in 1848 led to the California Gold Rush (Rolle 2003) and California's population grew exponentially. During this time, San Francisco became California's first true city, growing from a population of 812 to 25,000 in only a few years (Rolle 2003).

Sonoma County

The following excerpt from the County of Sonoma Historic Resources web page offers an overview of the County's history since the nineteenth century (Hurley 2020).

> Before the European settlement, [the Pomo, (Coast) Miwok, and Kashaya Indians inhabited] what is today Sonoma County. In 1812, the Russians established the short-lived Fort Ross along the coast north of the Russian River. Further east, the Sonoma Mission was established during the Mexican period in 1823. Shortly afterwards, Sonoma became the County's first town, a pueblo, under General Mariano Vallejo. During that time, sections of the County were transformed into vast land-grant ranchos, such as Vallejo's holdings that extended from today's Petaluma to the town of Sonoma. Most of the construction during the first half of the

nineteenth century was adobe and wood. These construction methods drew on the Mexican tradition while incorporating some of the features and floor plans of the Anglo Americans.

After statehood, logging along the coast hills, cattle ranching, wheat and potato farming, and the early development of the wine industry supported the sparsely settled county. During this time, commercial and industrial buildings used local stone or brick, while most residences were built of wood. During the 1860s to the 1890s, Petaluma, at the head of navigation on the Petaluma Creek, enjoyed rapid economic growth that fueled the construction of [its] downtown with sophisticated iron-front commercial buildings and elegant residences nearby.

Later the railroads facilitated the movement of goods and people leading to the establishment of processing plants and factories along the rail lines.

Around the turn of the century, the Russian River developed as a vacation resort, a destination for those in the San Francisco Bay Area. During this time, Santa Rosa also enjoyed an increase in population and importance as the center of finance and county government. Until World War II, the poultry industry, the processing of local fruit, and the production of hops sustained the economy throughout the County. In 1935, Sonoma County ranked tenth in the nation in overall agricultural production.

During the first half of the twentieth century, many of the stylish buildings were designed by local architects such as Brainerd Jones in Petaluma and William Herbert in Santa Rosa. After World War II, Clarence Caulkins and J. Clarence Felciano worked on many projects in the County. With reference to residential, commercial, and industrial architecture, many of the towns still retain excellent examples of both high style and vernacular building examples from the nineteenth and early twentieth centuries.

Today the southwestern part of the County continues to support cattle grazing and dairy farms. Toward the north many of the ranches and orchards have been replaced with acres of vineyards and thriving winery operations that rival Napa County. Over the years many of the poultry farms, fruit growers, and dairy operations have relocated to the Central Valley or sold their businesses completely. In their place, small specialty farms and ranches now operate sustainable and organic endeavors. Dotting the countryside throughout the County are modern residences where rural homesteads used to be. The Russian River area still caters to vacationers, but on a smaller scale, and the cities along the freeway continue to expand to provide housing and services with new subdivisions, business parks, and strip-mall shopping centers.

With 467,000 residents, the County has doubled its population since 1980. Part of the challenge has been to retain its agricultural and small-town character while providing for the livelihood of the expanding population. Related to this is the specific challenge of encouraging new development that complements both the physical beauty of the countryside and the County's rich heritage.

Existing Conditions

The analysis of cultural resources is based on the *Sonoma County Government Center Project Cultural Resources Technical Report* prepared by Rincon in support of the project in March 2025 and included the following: California Historical Resources Information System (CHRIS) and Native American Heritage Commission (NAHC) Sacred Lands File (SLF) searches, background research, archaeological and built environment pedestrian surveys, and the evaluation of nine historic-period properties and individual resources and as contributors to the potential Sonoma County Administrative Center District.

The CHRIS records search identified six previously recorded cultural resources within a 0.5 mile radius of the project site. Of these resources, none are recorded within the project site and one is recorded adjacent to the project site – the Hall of Justice and Old Jail, which was previously evaluated to historical resources eligibility, recommended ineligible, and since been demolished. On November 9, 2023 NAHC responded to the SLF request, stating that the results were negative.

Because the project site is developed with buildings and surface parking lots, there is little to no native ground exposure, and an archaeological survey was not conducted. A visual survey inspection of exposed ground landscaping did not result in the observation of any archaeological materials.

The field survey resulted in the identification of five buildings on the project site – 575 Administration Drive (Administration Building), 2604 Ventura Avenue (County Law Library), 585 Fiscal Drive (Clerk-Recorder/Assessor Building), 2550 Ventura Avenue (Permit Sonoma Building), and 2555 Paulin Avenue (Human Services and Economic Assistance Department Building)- and four on adjacent sites within the CAC that are more than 45 years old - 2680 Ventura Avenue (Facility Operations Garage), 370 Administration Drive (GIS, ISD, and Probation Office Building), 600 Administration Drive (Hall of Justice), and 2615 Paulin Drive (Information Systems Department Building).. Each was recorded individually and evaluated for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) as an individual resource and as a contributor to a potential historic district, the Sonoma County Administrative Center District. The potential historic district was recommended ineligible for listing in the NRHP/CRHR for a lack of historical and/or architectural significance. Similarly, eight of the buildings were recommended ineligible for individual listing under any applicable criteria for a lack of historical and/or architectural significance.

One building, the Administration Building at 575 Administration Drive, is the work of locally significant architect J. Clarence Felciano and designed in a subset of International style modern architecture that has been identified as Municipal Modernism. Constructed in 1958, it is a civic building that embodies the distinctive characteristics of an International style-influenced “Municipal Modern” building in Sonoma County and represents an important work of master architect J. Clarence Felciano. As discussed within Appendix G, the Administration Building is recommended individually eligible for listing in the NRHP and CRHR, though study of potential Sonoma County Administrative Center District found that the potential district was not eligible for listing in the NRHP or CRHR.

4.4.2 Regulatory Setting

The following presents a summary of the regulatory setting applicable to the proposed project.

a. Federal Regulations

National Register of Historic Places

Although the proposed project does not have a federal nexus, properties which are listed in or have been formally determined eligible for listing in the National Register of Historic Places (NRHP) are automatically listed in the California Register of Historical Resources (CRHR). The following is therefore presented to provide applicable regulatory context. The NRHP was authorized by Section 101 of the National Historic Preservation Act (NHPA) and is the nation’s official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in

districts, sites, buildings, structures, and objects. Per 36 Code of Federal Regulations Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

Criterion A: Is associated with events that have made a significant contribution to the broad patterns of our history

Criterion B: Is associated with the lives of persons significant in our past

Criterion C: Embodies the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history

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

Location: The place where the historic property was constructed or the place where the historic event occurred

Design: The combination of elements that create the form, plan, space, structure, and style of a property

Setting: The physical environment of a historic property

Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property

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

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

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

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

b. State Regulations

California Environmental Quality Act

Public Resources Code (PRC) Section 21084.1 requires lead agencies to determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a historical resource is a resource listed in, or determined eligible for listing in, the CRHR, a resource included in a local register of historical resources or identified in a historical resources survey pursuant to PRC Section 5024.1(g), or any object, building, structure, site, area, place, record,

or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or culturally significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the National Register of Historic Places (NRHP) are automatically listed in the CRHR, as are California Historical Landmarks 770 and above; resources in either category are therefore also considered historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

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

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

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

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

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

California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Sections 5024.1 and Title 14 California Code of Regulations Section 4852. The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1[a]). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (PRC Section 5024.1[b]). However, unlike the NRHP, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (California Office of Historic Preservation 2011). Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (California Office of Historic Preservation 2011). Generally, the California Office of Historic Preservation recommends resources over 45 years of age be recorded and evaluated for historical resources eligibility (California Office of Historic Preservation 1995).

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

Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage

Criterion 2: Is associated with the lives of persons important to our past

Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values

Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history

California Health and Safety Code

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

California Public Resources Code Section 5097.98

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

c. Local Regulations

Sonoma County General Plan

The Sonoma County General Plan's Open Space and Resource Conservation Element includes the following goals, objectives, and policies related to Archeological, Cultural, and Historical Resources:

Goal OSRC-19: Protect and preserve significant archaeological and historical sites that represent the ethnic, cultural, and economic groups that have lived and worked in Sonoma County, including Native American populations. Preserve unique or historically significant heritage or landmark trees.

Objective OSRC-19.1: Encourage the preservation and conservation of historic structures by promoting their rehabilitation or adaptation to new uses.

Objective OSRC-19.3: Encourage protection and preservation of archaeological and cultural resources by reviewing all development projects in archaeologically sensitive areas.

Objective OSRC-19.5: Encourage the identification, preservation, and protection of Native American cultural resources, sacred sites, places, features, and objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites. Ensure appropriate treatment of Native American and other human remains discovered during a project.

Objective OSRC-19-6: Develop and employ procedures to protect the confidentiality and prevent inappropriate public exposure of sensitive archaeological resources and Native American cultural resources, sacred sites, places, features, or objects.

Santa Rosa General Plan 2050

Though not applicable to the project, the following objectives and policies of the Santa Rosa General Plan are applicable to cultural resources in the city limits:

Goal 4-2: Protect Tribal cultural resources in Santa Rosa and enrich the sense of place and understanding of the city's history and prehistory.

Policy 4-2.1: Protect Tribal heritage, honor the early stewards of this land, and treat Native American remains and resources with sensitivity.

Policy 4-2.2: Contact the Native American Heritage Commission (NAHC) to identify tribes that are traditionally and culturally affiliated with the geographic area of the proposed project.

Goal 4-3: Protect the historic and cultural resources of Santa Rosa and enrich the sense of place and understanding of the city's history and prehistory.

Policy 4-3.1: Preserve Santa Rosa's historic sites, buildings, and neighborhoods.

4.4.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The evaluation of impacts to cultural resources addressed in this section is based on review of the following sources: NRHP, CRHR, geologic and soil maps, Section 4.6, *Geology and* Soils of this EIR,

and previously analyzed project-specific EIRs in the vicinity of the project area. In general, impacts could occur if there is demolition, destruction, relocation, or alteration of a cultural resource or its surroundings, or other disturbances.

Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, impacts related to cultural resources would be significant if the proposed project would:

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

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

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

The State Legislature, in enacting the CRHR, amended CEQA to clarify which properties are significant, as well as which project impacts are considered to be significantly adverse. A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have significant effect on the environment (CEQA Guidelines Section 150645[b]). A substantial adverse change in the significance of a historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (CEQA Guidelines Section 150645[b][1]).

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

b. Project Impacts and Mitigation Measures

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

Impact CUL-1 THE OFFICE SITE OF THE PROPOSED PROJECT WOULD DEMOLISH THE ADMINISTRATION BUILDING, WHICH WAS RECOMMENDED ELIGIBLE FOR LISTING IN THE NRHP AND CRHR IN THE ATTACHED CULTURAL RESOURCES TECHNICAL REPORT AND CONSIDERED A HISTORICAL RESOURCE. DUE TO THE DEMOLITION OF A HISTORICAL RESOURCE, IMPACTS TO HISTORICAL RESOURCES ASSOCIATED WITH THE OFFICE SITE WOULD BE SIGNIFICANT AND UNAVOIDABLE, EVEN WITH IMPLEMENTATION OF MITIGATION MEASURES CUL-1A AND CUL-1B. IMPACTS ASSOCIATED WITH THE RESIDENTIAL SITE WOULD RESULT IN NO IMPACT TO HISTORICAL RESOURCES.

Office Site

As detailed in the cultural resource technical report prepared in support of the proposed project and attached as Appendix G, the Administration Building, constructed in 1958, was identified as individually eligible for listing in the NRHP and CRHR under Criterion C/3 (Architecture). The significance of the building is related to its international style-influenced "Municipal Modern" style and its representation of the work of locally prominent architect J. Clarence Felciano (1908-1992). Therefore, it is a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines.

According to CEQA (Section 21084.1), a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. Substantial adverse change is defined as demolition, destruction, relocation, or alteration activities that would impair the significance of the historical resource.

Because construction of the office site would result in the demolition of the Administration Building, it would constitute a substantial adverse change to a historical resource and this impact would be potentially significant and would require implementation of Mitigation Measures CUL-1a and CUL-1b.

Residential Site

The residential site is developed with two age-eligible buildings – 2550 Ventura Avenue (Permit Sonoma Building) and 2555 Paulin Avenue (Human Services and Economic Assistance Department Building). As detailed in the cultural resources technical report, the buildings were evaluated and recommended ineligible as historical resources. Therefore, the residential site of the proposed project would result in no impact to historical resources as defined in Section 15064.5(b) of the *CEQA Guidelines*.

Mitigation Measures

CUL-1a Building Recordation

Archival documentation of as-built and as-found conditions shall be prepared for the Administration Building, prior to demolition. Prior to issuance of demolition permits, the County of Sonoma shall ensure that documentation of the building proposed for demolition is completed and follows the general guidelines of Historic American Building Survey (HABS)-level II documentation. The documentation shall include high resolution large-format and digital photographic recordation, a historic narrative report, compilation of historic research, and copies of historical architectural plans

of the building (if available). The documentation shall be completed by a qualified professional who meets the standards for history, architectural history, or architecture as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The original archival-quality documentation shall be offered as donated material to the Sonoma County Public Library to make it available for current and future generations. Archival copies of the documentation also would be retained by the County of Sonoma and the Northwest Information Center where it would be available to local researchers.

CUL-1b Interpretive Display

Impacts resulting from the demolition of the Administration Building at 575 Administration Drive shall be minimized through the installation of a high-quality, on-site interpretive display in a publicly accessible location within the project site, ideally on a site corresponding to the Administration Building's footprint. The display shall provide context on the CAC's historical development and focus on the Administration Building's role as a Modern civic building, as well as the building's Modern architectural design and association with local master architect J. Clarence Felciano. The interpretive display shall be overseen by a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) for Historian or Architectural Historian. historic information contained in Rincon's Cultural Resources Technical Report and District Record for the Sonoma County Administrative Center, and individual DPR Form set for the Administration Building can serve as the basis for the interpretive display. The goal of the interpretive display would be to educate the public about the Administration Building's history and architectural significance. The content of the display should be approved by the County of Sonoma Planning Division or designee. The display should be installed before the proposed project is complete and receives a certificate of occupancy.

Significance After Mitigation

Implementation of Mitigation Measures CUL-1a and CUL-1b would reduce impacts to historical resources associated with the office site to the extent feasible by recording and interpreting the historical resource. Nonetheless, even with implementation of Mitigation Measures CUL-1a and CUL-1b, eligible historical resources would still be materially impaired by the proposed office site which includes the demolition of the Administration Building. Although HABS-like documentation would reduce impacts to the greatest extent feasible, legal precedent has established that such a measure cannot mitigate impacts to a level of less than significant, because the loss of historical fabric cannot be readily compensated for by commemorative mitigation.[1] Therefore, impacts associated with the office site would remain significant and unavoidable.

For the residential site, no mitigation would be required and there would be no impact to historical resources.

[1] League For Protection of Oakland's Architectural and Historic Resources, Plaintiff and Appellant, v. City of Oakland et al., Montgomery Ward & Co., Inc., et al. No. A074348. First District, Division One. Feb 10, 1997.

Threshold 2:	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact CUL-2 ALTHOUGH THE PROPOSED PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A KNOWN ARCHAEOLOGICAL RESOURCE PURSUANT TO SECTION 15064.5, CONSTRUCTION OF THE PROPOSED PROJECT WOULD INVOLVE GROUND DISTURBING ACTIVITIES THAT MAY HAVE THE POTENTIAL TO ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED ARCHAEOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH INCORPORATION OF MITIGATION MEASURES.

Overall Project (Office and Residential Sites)

The cultural resources technical report conducted for this project did not identify any archaeological resources within the project site. The SLF request was negative and the NWIC records search results did not identify any prehistoric or historic-age archaeological resources within the project site or immediate vicinity.

The lack of surface evidence of archaeological materials does not preclude their subsurface existence. However, the absence of substantial prehistoric or historic-period archaeological remains within the immediate vicinity, along with the existing level of disturbance in the project site by its former agricultural and recent government office development, suggests there is a low potential for encountering intact subsurface archaeological deposits. Therefore, Mitigation Measures CUL-2a and CUL-2b would be required to reduce impacts to archaeological resources to a less than significant level.

Mitigation Measures

CUL-2a Preconstruction Cultural Resources Sensitivity Training

Prior to the start of project-related ground disturbing activities, a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology (36 CFR Part 61) shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an unanticipated discovery of archaeological resources or human remains. The County shall ensure that construction personnel attend the training and retain documentation demonstrating attendance.

CUL-2b Inadvertent Discovery of Archaeological Resources

In the event that archaeological resources are inadvertently encountered during ground-disturbing activities, work in a 50-foot radius of the find shall be halted and redirected, and the Qualified Archaeologist shall be contacted immediately. The Qualified Archaeologist or other designated archaeologist working under the direction of the Qualified Archaeologist shall provide recommendations regarding the resource's potential significance and potential treatment in coordination with the County. If the resource is determined by the Qualified Archaeologist to be indigenous in origin, then a Native American representative shall also be contacted to participate in the evaluation of the resource. Avoidance and preservation in place shall be the preferred manner of mitigating impacts to archaeological resources. If the Qualified Archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, the Qualified Archaeologist shall prepare a data

recovery plan tailored to the physical nature and characteristics of the resource, pursuant to the requirements of the *CEQA Guidelines* Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts related to the resource. Pursuant to the data recovery plan, the Qualified Archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The County shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, pursuant to *CEQA Guidelines* Section 15126.4(b)(3)(C).

Significance After Mitigation

Implementation of mitigation measures outlined above would reduce potential project impacts to unanticipated or previously unknown archaeological resources through preconstruction cultural resources sensitivity training and unanticipated discovery protocols during construction. With implementation of Mitigation Measures CUL-2a and CUL-2b, impacts to archeological resources would be reduced to less than significant.

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

Impact CUL-3 CONSTRUCTION OF THE PROPOSED PROJECT WOULD INVOLVE GROUND-DISTURBING ACTIVITIES THAT MAY HAVE THE POTENTIAL TO ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED HUMAN REMAINS. THE PROPOSED PROJECT WOULD COMPLY WITH CALIFORNIA HEALTH AND SAFETY CODE SECTION 7050.5, WHICH WOULD ENSURE IMPACTS TO HUMAN REMAINS ARE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

The CHRIS records did not identify archaeological resources containing human remains within the project area or immediate vicinity. The proposed project does involve ground disturbing activities that have the potential to encounter human remains, including those interred outside of formal cemeteries. As noted in the Section 4.4.2b of the Regulatory Setting, human burials have specific provisions for treatment under Health and Safety Code Section 7050.5 and PRC Sections 5097.5, 5097.94 and 5097.98.

If human remains are found during ground disturbing activities, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County coroner shall be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access to the site and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Due to required compliance with PRC Section 5097.98 and California Health and Safety Code Section 7050.5, impacts to human remains would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.4.4 Cumulative Impacts

The geographic scope for cumulative impacts related to cultural resources include the project area and the surrounding areas, including the incorporated City of Santa Rosa and the unincorporated Sonoma County lands adjacent to the City. This geographic scope is appropriate because, generally, cultural resources impacts associated with individual developments are site-specific in nature and must be addressed on a case-by-case basis.

The past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1 in Chapter 3, *Environmental Setting*, would have the potential to adversely impact historical resources. The magnitude of impacts for individual projects to significantly impact historical resources would depend upon the location, size of development, and proximity to historical built environment resources. Historic resource evaluations would be completed on a case-by-case basis for all future development. Compliance with applicable regulations and implementation of appropriate mitigation measures, including resource avoidance measures and noise and vibration reduction measures, would address impacts related to historical resources associated with cumulative development. However, the proposed project's cumulative impact would ultimately involve substantial adverse changes in the significance of historical resources. Accordingly, cumulative impacts to historic resources would be significant and unavoidable.

Past, present, and reasonably foreseeable future projects would also have the potential to adversely impact buried archaeological resources through ground-disturbing construction activities. The magnitude of impacts for individual projects to archaeological resources would depend upon the location, size of development, depth of the ground disturbance, and the resources within the individual development sites. Archeological resource evaluations would be completed on a case-by-case basis for all future development. Compliance with applicable regulations and implementation of appropriate mitigation measures, including resource avoidance measures and monitoring during ground disturbance within culturally sensitive areas, would address impacts related to archaeological resources associated with cumulative development. Therefore, cumulative development would have a less-than-significant cumulative impact involving substantial adverse changes in the significance of archeological resources.

Similarly, cumulative development projects would have the potential to adversely impact buried human remains through ground-disturbing construction activities. The magnitude of impacts for individual projects would depend upon the location, size of development, depth of the ground disturbance. State of California Health and Safety Code Section 7050.5 would apply to all future development, and compliance with such regulations would address impacts related to buried human remains associated with cumulative development. Therefore, cumulative development would have a less-than-significant cumulative impact involving the disturbance of human remains.

4.5 Energy

This section evaluates impacts to energy, including the potential wasteful, inefficient, or unnecessary consumption of energy, associated with development of the proposed project. This analysis follows the guidance for evaluation of energy impacts contained in Appendix F and Appendix G of the *CEQA Guidelines*. The physical environmental impacts from emissions associated with the generation of electricity and burning of fuels have been accounted for in Section 4.2, *Air Quality*, and Section 4.7, *Greenhouse Gas Emissions*. The California Emissions Estimator Model (CalEEMod) Version 2022.1 was used to estimate emissions resulting from the proposed project. Construction and operational energy consumption were modeled based on the size of the proposed land use type. The CalEEMod results are provided in (Appendix E).

4.5.1 Setting

Energy relates directly to environmental quality because energy use can adversely affect air quality and other natural resources. Fossil fuels are burned to create electricity to power homes and vehicles, which creates heat. Transportation energy use relates to the fuel efficiency of cars and trucks, and the availability and use of public transportation, the choice of different travel modes (auto, carpool, and public transit), and the miles traveled by these modes. Construction and routine operation and maintenance of infrastructure also consume energy, typically in the form of electricity.

a. Energy Supply

The proposed project would not use natural gas onsite and would instead be powered by electricity supplied by Pacific Gas & Electric (PG&E). Based on the California Energy Commission's (CEC's) California Energy Demand Forecast, 2024-2040, PG&E's total energy to serve load[1] for 2028 is 113,916 gigawatt hour (GWh) and the net peak demand[2] in 2028 will be 22,365 megawatt of electricity under typical weather conditions[3] (CEC 2024a). The proposed project's energy consumption is compared to PG&E's energy demand capacities in Section 4.5.3, *Impact Analysis*, of this section.

b. Energy Consumption and Sources

In 2023, total energy consumption in the United States was approximately 94 quadrillion British Thermal Units (Btu). Petroleum provided approximately 38 percent of that energy, other sources of energy coming from natural gas (approximately 36 percent), coal (approximately nine percent), total renewable sources (approximately nine percent), and nuclear power (approximately nine percent) (United States Energy Information Administration [EIA] 2024a). On a per capita basis in 2023, California was ranked the third lowest state in terms of total energy consumption (174 million Btu [MMBtu] per person), or about 37 percent less than the U.S. average per capita consumption of 278 MMBtu per person (EIA 2025a).

[1] The total energy to serve load is the total electricity demand for a given forecasted year within a utility service area. This forecast is a benchmark for the utility to have enough electricity to serve total demand.
[2] The net peak demand is the maximum amount of instantaneous energy demand for all buildings within a utility service area over the course of the forecasted year, minus losses from transmission and distribution, and utility generated solar. This forecast projects the peak amount of instantaneous energy a utility would need to have the capacity to serve this peak demand.
[3] Represents average temperature conditions and serves as the baseline.

The smallest scale at which energy consumption information is readily available is the county level. Therefore, Sonoma County is used to characterize the project area's existing consumption of petroleum and electricity as described in the following subsections.

c. Electricity

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves several system components. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Substations and transformers then lower transmission line power (voltage) to a level appropriate for on-site distribution and use.

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

Most of the electricity generated in California is from natural gas-fired power plants, which provided approximately 44 percent of total electricity generated in 2023. In 2023, California produced 281,140 GWh of electricity with 215,623 GWh (77 percent) of the electricity generated in-state and the rest imported from outside the state (CEC 2025a). Sonoma County consumed approximately 2,777 GWh of electricity in 2023 from residential and non-residential uses (CEC 2025b). With a population of 480,343 in 2023 (Department of Finance [DOF] 2024), the County's 2023 per capita electricity consumption was approximately 5,781 kilowatt hour (kWh) per person.

In conjunction with the utility companies, the California Public Utilities Commission (CPUC) is involved in energy conservation programs. CPUC and CEC are constantly assessing population growth, electricity demand, and reliability. The CEC is tasked with conducting assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The CEC uses these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety (Public Resources Code [PRC] Section 25301[a]).

Power plants that provide electricity for PG&E are required to go through individual environmental review processes, which may be through the CEC's certified regulatory program under CEQA, or through the CPUC's CEQA processes. The CEC is continuously tracking potential projects 50 MW and larger (CEC 2025c). Similarly, the CPUC conducts and manages environmental review of infrastructure projects, including electric, gas, water, and telecommunications (CPUC 2025).

d. Transportation Energy

Transportation accounted for approximately 45 percent of California's total energy consumption in 2023 (EIA 2025b). In 2023, California consumed 13.6 billion gallons of gasoline and 3.0 billion gallons of diesel fuel (CEC 2024b). Petroleum-based fuels currently account for 85 percent of California's transportation energy sources (EIA 2024b). However, the State is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented

several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce vehicle miles traveled (VMT). Accordingly, gasoline consumption in California has declined. In 2023, gasoline and diesel sales in Sonoma County were approximately 184 million gallons and 32 million gallons, respectively (CEC 2024b).

4.5.2 Regulatory Setting

a. Federal Regulations

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 facilitates the reduction of national energy use and GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances; and
- Requiring approximately 25 percent greater efficiency for light bulbs that have traditionally used between 40 and 100 watts of electricity.

Although this act has been superseded by the United States Environmental Protection Agency (USEPA) and National Highway Traffic Safety Administration (NHTSA) actions described below, this act established miles per gallon targets for cars and light-duty trucks, and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of the Energy Independence and Security Act address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs." [4]

Energy Policy and Conservation Act

Enacted in 1975, the Energy Policy and Conservation Act legislation established fuel economy standards for new light-duty vehicles (autos, pickups, vans, and sport-utility vehicles). The law placed responsibility on the NHTSA, a part of the United States Department of Transportation (USDOT), for establishing and regularly updating vehicle standards. The USEPA administers the Corporate Average Fuel Economy (CAFE) program, which determines vehicle manufacturers' compliance with existing fuel economy standards. Since the inception of the program, the average fuel economy for new light-duty vehicles steadily increased from 13.1 miles per gallon (mpg) for the 1975 model year to 30.7 mpg for the 2014 model year and can increase to 54.5 mpg by 2025.

[4] A "green job," as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

On August 2, 2018, the NHTSA and USEPA, operating under the direction of the Trump Administration, proposed the Safer Affordable Fuel-Efficient Vehicles Rule Part One (SAFE I Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated in two parts as described below.

Part One, "One National Program" (84 Federal Register 51310) revokes a waiver granted by USEPA to the State of California under Section 209 of the Clean Air Act to enforce more stringent emission standards for motor vehicles than those required by USEPA for the explicit purpose of GHG emission reduction, and indirectly, criteria air pollutants and ozone precursor emission reduction. This revocation became effective on November 26, 2019, potentially restricting the ability of the California Air Resources Board (CARB) to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California.

Part Two addresses CAFE standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposes new CAFE standards for model years 2022 through 2026 and would amend existing CAFE standards for model year 2021. The proposal would retain the model year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026. The proposal addressing CAFE standards was jointly developed by NHTSA and USEPA, with USEPA simultaneously proposing tailpipe carbon dioxide standards for the same vehicles covered by the same model years.

The USEPA and NTHSA published final rules to amend and establish national carbon dioxide and fuel economy standards on April 30, 2020 (Part Two of the SAFE Vehicles Rule) (85 Federal Register 24174). On April 22, 2021, the Biden Administration formally proposed to roll back portions of the SAFE Rule, thereby restoring California's right to enforce more stringent fuel efficiency standards. Most recently, on December 21, 2021, the NHTSA finalized rules to repeal the SAFE I Rule. The final rule concludes the SAFE I Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important State and local interests. The final rule ensures the SAFE I Rule will no longer form an improper barrier to states exploring creative solutions to address their local communities' environmental and public health challenges.

National Energy Policy Act of 1992

The National Energy Policy Act calls for programs that promote efficiency and the use of alternative fuels. The National Energy Policy Act requires certain federal, state, and local government and private fleets to purchase a percentage of light duty alternative fuel vehicles capable of running on alternative fuels each year. In addition, the National Energy Policy Act has financial incentives. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of alternative fuel vehicles. The National Energy Policy Act also requires states to consider a variety of incentive programs to help promote alternative fuel vehicles.

Clean Air Act

The Clean Air Act Section 211(o), as amended by the Energy Policy Act of 2005, requires the Administrator of the USEPA to annually determine a renewable fuel standard which is applicable to refineries, importers, and certain blenders of gasoline, and to publish the standard in the Federal Register by November 30 each year. On the basis of this standard, each obligated party determines the volume of renewable fuel that it must ensure is consumed as motor vehicle fuel. This standard is calculated as a percentage, by dividing the amount of renewable fuel that the Clean Air Act requires to be blended into gasoline for a given year by the amount of gasoline expected to be used during that year, including certain adjustments specified by the Clean Air Act.

Energy Policy Act of 2005

The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Construction Equipment Fuel Efficiency Standard

USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 horsepower and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements and are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Emissions requirements for new off-road Tier 4 vehicles were completely phased in by the end of 2015.

b. State Regulations

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the CEC. The Act established a State policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures.

California Building Standards Code

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, and accessibility for persons with physical and sensory disabilities. The California Building Standards Code's energy-efficiency and green building standards are outlined below. These standards are updated every three years; however, AB 130 places a six year pause on new state and local residential building code updates, effective January 1, 2026. Because the project's building permit will occurr after January 1, the proposed project is subject to the 2022 California Building Standards.

Part 6 – Building Energy Efficiency Standards/Energy Code

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC.

Part 11 – California Green Building Standards

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective on January 1, 2011 (as part of the 2010 California Building Standards Code). The 2022 CALGreen includes

mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

The mandatory standards applicable to air quality require:

- Electric Vehicle (EV) Charging for New Construction:[5]
  - One- and two-family dwellings and town houses with attached private garages: Dedicated circuitry to facilitate installation of electric vehicle (EV) charging.
  - Multi-family dwellings and hotels/motels with less than 20 units/rooms: Designation of at least 10 percent of the total number of parking spaces shall be EV capable and at least 25 percent of the total number of parking spaces shall be EV-ready;
  - Multi-family dwellings and hotels/motels with greater than 20 units/rooms: Designation of at least 10 percent of the total number of parking spaces shall be EV capable, at least 25 percent of the total number of parking spaces shall be EV-ready, and at least 5 percent of the total number of parking spaces shall be equipped with a Level 2 charging station.
  - Non-residential land uses shall comply with the following EV charging requirements based on the number of passenger vehicle parking spaces:
    - 0-9: no EV capable spaces or charging stations required;
    - 10-25: 4 EV capable spaces, but no charging stations required;
    - 10-25: 4 EV capable spaces but no charging stations required;
    - 26-50: 8 EV capable spaces of which 2 must be equipped with charging stations;
    - 51-75: 13 EV capable spaces of which 3 must be equipped with charging stations;
    - 76-100: 17 EV capable spaces of which 4 must be equipped with charging stations;
    - 101-150: 25 EV capable spaces of which 6 must be equipped with charging stations;
    - 151-200: 35 EV capable spaces of which 9 must be equipped with charging stations; and
    - More than 200: 20 percent of the total available parking spaces of which 25 percent must be equipped with charging stations.

Non-residential land uses shall comply with the following EV charging requirements for medium- and heavy-duty vehicles: warehouses, grocery stores, retail stores, office buildings, and manufacturing facilities with planned off-street loading spaces shall install EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s), or subpanel(s) at the time of construction based on the number of off-street loading spaces as indicated in Table 5.106.5.5.1 of the California Green Building Standards;

- Bicycle Parking:
  - Non-residential short-term bicycle parking for projects anticipated to generate visitor traffic: permanently anchored bicycle racks within 200 feet of visitor entrance for 5 percent of new visitor motorized vehicle parking spaces with a minimum of one 2-bike capacity rack; and/or

[5] EV Capable = a vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways to support EV charging; EV-ready = a vehicle space which is provided with a branch circuit and any necessary raceways to accommodate EV charging stations, including a receptacle for future installation of a charger (see 2025 California Green Building Standard Code, Title 24 Part 11 for full explanation of mandatory measures, including exceptions).

  - Non-residential buildings with tenant spaces of 10 or more employees/tenant-occupants: secure bicycle parking for 5 percent of the employee/tenant-occupant vehicle parking spaces with a minimum of one bicycle parking facility.

- Shade Trees (Non-Residential):
  - Surface parking: minimum No. 10 container size or equal shall be installed to provide shade over 50 percent of the parking within 15 years (unless parking area covered by appropriate shade structures and/or solar);
  - Landscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years; and/or
  - Hardscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years (unless covered by applicable shade structures and/or solar or the marked area is for organized sports activities).

The voluntary standards applicable to air quality require:

- Residential – Cool Roofs: have a thermal mass over the roof membrane, including green roofs weighing a minimum of 25 pounds per square foot or roof areas covered by solar photovoltaic panels and building integrated solar thermal panels;
- Residential – Reduce nonroof heat island for 50 percent of sidewalks, patios, driveways or other paved areas;
- One- and two-family dwelling units and townhouses with attached garages: install a dedicated 208/250-volt branch circuit for EV charging;

Residential Bicycle Parking:

- Multi-family/hotel/motel short-term parking: provide permanently anchored bicycle racks within 100 feet of visitor's entrance for 5 percent of visitor motorized vehicle parking capacity (minimum one 2-bike capacity rack);
- Multi-family buildings long-term parking: provide acceptable on-site bicycle parking for at least one bicycle per every two dwelling units; and/or
- Hotel/motel long-term parking: provide one acceptable on-site bicycle parking space for every 25,000 square feet but not less than two spaces;

Tier I:

- Stricter energy efficiency requirements;
- Stricter water conservation requirements for specific fixtures;
- minimum 65 percent reduction in construction waste with third-party verification, Minimum 10 percent recycled content for building materials;
- Minimum 20 percent permeable paving;
- Minimum 20 percent cement reduction;
- Multi-family developments/hotels/motels: minimum 35 percent of total parking spaces shall be EV ready and for projects with 20 or more dwelling units/rooms a minimum of 10 percent of the total number of parking spaces shall be equipped with EV charging stations.

Tier II:

- Stricter energy efficiency requirements,
- Stricter water conservation requirements for specific fixtures;
- Minimum 75 percent reduction in construction waste with third-party verification,
- Minimum 15 percent recycled content for building materials;
- Minimum 30 percent permeable paving;
- Minimum 25 percent cement reduction; and/or
- Multi-family developments/hotels/motels: minimum 40 percent of total parking spaces shall be EV ready and for projects with 20 or more dwelling units/rooms, a minimum of 15 percent of the total number of parking spaces shall be equipped with EV charging stations.

California Appliance Efficiency Regulations

The Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608), adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Senate Bill 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 implements some of the goals of Executive Order B-30-15, issued in April 2015, which established a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. The objective of SB 350 is to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation by 2030. The latest statewide GHG emissions target and procurement of electricity from renewable sources is discussed under Senate Bill 1020 below.

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, CCR, Division 3, Chapter 10, Section 2485) was adopted to reduce public exposure to diesel particulate matter and other air contaminants by limiting the idling of diesel-fueled commercial motor vehicles. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given location. This measure applies to diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways. Reducing idling of diesel-fueled commercial motor vehicles reduces the number of petroleum-based fuels used by the vehicle.

In-Use Off-Road Diesel Fueled Fleets Regulation

Since off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the “In-Use Off-Road Diesel Fueled Fleets Regulation” to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an idling limit of five minutes for all off-road vehicles 25 horsepower and up. It also establishes emission rate targets for the off-road vehicles that decline

over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. The regulation enforces restrictions against adding new equipment with older tier engines, such as Tier 0 and Tier 1 engines, effective January 1, 2014. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year or has completed the Best Available Control Technology requirements. Large fleets have compliance deadlines each year from 2014 through 2023, medium fleets each year from 2017 through 2023, and small fleets each year from 2019 through 2028. Large and medium fleets would have 100 percent compliance with Tier 2 or higher engines by 2023. Small fleets would have 100 percent Tier 2 or higher engines by 2028.

Senate Bill 1389

SB 1389 (PRC Sections 25300–25323) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. The CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The 2023 Integrated Energy Policy Report, adopted in February 2024, highlights the implementation of California's policies and the role they have played in establishing a clean energy economy. The Integrated Energy Policy Report contains recommendations on energy usage policies such as decarbonizing buildings, energy efficiency savings, increasing flexibility in the electrical system to integrate more renewable energy and improve energy reliability, and reducing gasoline and diesel use in cars and trucks by up to 50 percent (CEC 2024c).

Clean Energy, Jobs, and Affordability Act of 2022 (Senate Bill 1020)

Established in 2002 under SB 1078, and accelerated by SB 107 (2006), SB X 1-2 (2011), SB 100 (2018), and SB 1020, California's Renewable Portfolio Standard (RPS) obligates investor-owned utilities, energy service providers, and community choice aggregators to supply eligible renewable energy resources and zero-carbon resources for 90 percent of retail sale electricity by 2035, 95 percent by 2040, 100 percent by 2045, and 100 percent of electricity procured to serve all State agencies by 2035. SB 1020 supersedes SB 350, signed October 7, 2015, that increases the procurement of electricity from renewable source to 50 percent by 2030. The CPUC and the CEC are jointly responsible for implementing the program.

c. Local Regulations

Plan Bay Area 2050

Plan Bay Area 2050 is a state-mandated, integrated long-range transportation, land-use, and housing plan, known as a Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), that would support a growing economy, provide more housing and transportation choices and reduce transportation-related pollution in the nine-county San Francisco Bay Area (Metropolitan Transportation Commission/Association of Bay Area Governments [MTC/ABAG] 2021). Plan Bay Area 2050 builds on earlier efforts to develop an efficient transportation network and grow in a financially and environmentally responsible way. Plan Bay Area 2050 focuses on advancing equity and improving resiliency in the Bay Area by creating strategies in the following four elements: Housing, Economy, Transportation, and Environment. The Plan discusses how the future is uncertain due to anticipated employment growth, lack of housing options, and outside forces, such as climate change and economic turbulence. These uncertainties will impact growth in the Bay Area and exacerbate issues for those who are historically and systemically marginalized and

underserved and excluded. Thus, Plan Bay Area 2050 has created strategies and considered investments that will serve those systemically underserved communities and provide equitable opportunities. The Plan Bay Area 2050 presents a total of 35 strategies to outline how the $1.4 trillion dollar investment would be utilized. The strategies include, but are not limited to, the following: providing affordable housing, allowing higher-density in proximity to transit-corridors, optimizing the existing roadway network, creating complete streets, providing subsides for public transit, reducing climate emissions, and expanding open space area. To bring these strategies to fruition, it will require participation by agencies, policymakers, and the public. An implementation plan is also included as part of the Plan Bay Area 2050 to assess the requirements needed to carry out the strategies, identify the roles of pertinent entities, create an appropriate method to implement the strategies, and create a timeline for implementation.

Sonoma Climate Mobilization Strategy

Action 2020 and Beyond, which established a framework for countywide GHG reduction efforts. On May 8, 2018, the County adopted a resolution committing to work toward the RCPA's countywide targets of reducing GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. Since then, in March 2021, the RCPA adopted the Sonoma Climate Mobilization, which expanded upon Climate Action 2020 and Beyond setting a goal of carbon neutrality by 2030, a more ambitious goal than California's 2020 goal of 40 percent below 1990 levels by 2030. The Sonoma Climate Mobilization Strategy contains a ten-year policy package that outlines 13 countywide strategies under local authority that have the potential to significantly reduce GHG emissions and increase carbon sequestration by 2030. The following strategies applicable to the project to reduce GHG impacts include (RCPA 2021):

Decarbonization

Strategy 1: All-Electric Building Campaign

Objective 1.1: Develop a date-certain, funded, and phased retrofit requirement for existing buildings to transition to all-electric and improve their overall energy efficiency:

- Adopt a requirement to retrofit all municipal buildings to enhance energy efficiency and convert to all-electric by 2030.

Objective 1.2: Require new buildings to be all-electric.

Strategy 2: Carbon-Free Electricity

Objective 2.2: Achieve 100 percent carbon-free electricity in municipal buildings by 2030 through a combination of Sonoma Clean Power Evergreen, City of Healdsburg Green Rate, and onsite solar plus battery storage.

Strategy 4: EV Access for All Partnership

Objective 4.1: Work with regional partners and local businesses to develop over 10,000 public and workplace charging stations in Sonoma County by 2027, emphasizing the installation of charging stations in rental properties in frontline communities.

Resilience and Adaptation

Strategy 10: Energy Grid for the Future

> **Objective 10.1:** Develop both community and municipal microgrids, focusing on supporting critical infrastructure and vulnerable populations first.

County of Sonoma Climate Resilience Comprehensive Action Plan

The County of Sonoma Climate Resilience Comprehensive Action Plan (Climate Plan) was approved in August 2024, which outlines the County intended path to reduce energy consumption from the County's operations and increase resilience to climate hazards that threaten Sonoma County. This Climate Plan aims to enable the County to achieve carbon neutrality by the year 2030. The following strategies and measures are applicable to the project (County of Sonoma 2024).

Energy

Measure E-CO-5: Minimize energy use and maximize resilience in new County Facilities by developing energy policies.

Measure E-CO-6: Minimize energy use and maximize resilience in the new County Government Center by following approved building energy design policies (E-CO-5), or by achieving LEED certification.

Measure E-CO-8: Reduce energy use and increase resilience in the mid-term by completing public lighting upgrades to high-efficiency systems.

Measure E-CO-9: Promote electric vehicle readiness.

Transportation

Measure T-CO-1: Decarbonize the County fleet of light duty vehicles by 2040.

Measure T-CO-5: Deploy zero emission vehicle infrastructure in number and locations to support the decarbonization schedule for light and heavy-duty fleets.

Santa Rosa General Plan 2050

While the County is not subject to the City's building and zoning laws, the County does intend, where appropriate and feasible, to work with the City to avoid land use conflicts. Accordingly, City of Santa Rosa regulations are provided for informational purposes.

The City of Santa Rosa General Plan sets forth the following guiding and implementing policies relevant to energy:

Goal 2-3: Create dense and varied housing types near transit to reduce greenhouse gas emissions and promote livability.

> **Policy 2-3.1:** Ensure that residential developments, including subdivisions and neighborhoods, are designed to foster livability, maintain local and historic character of neighborhoods, and offer diverse housing types to satisfy a wide range of needs and retain local character.
>
> **Policy 2-3.2:** Ensure that residential developments achieve the density potential of the project site and include a variety of housing types with a full range of affordability, in accordance with the General Plan Land Use map (Figure 2-6).

Goal 3-1: Provide an integrated land use and transportation system with safe and efficient movement of people and goods for all modes of travel that prioritizes reduction of VMT and transportation-related GHG emissions.

> **Policy 3-1.2:** Promote a citywide mode shift away from single-occupancy vehicles to support ambitious VMT and GHG reduction goals.
>
> **Policy 3-1.3:** Promote land use, development, and transportation demand management (TDM) strategies that reduce VMT and dependence on single occupancy vehicle trips.

Goal 3-4: Mitigate the traffic-related impacts of new land uses.

> **Policy 3-4.2:** In areas other than the downtown, strive to meet intersection LOS D to maintain adequate operation of the street network and minimize cut through traffic on residential streets.

County of Sonoma General Plan

The County of Sonoma General Plan 2020 was amended in August 2016 and contains the following goals, objectives, and policies applicable to energy issues related to the proposed project (County of Sonoma 2016):

Goal OSRC-14: Promote energy conservation and contribute to energy demand reduction in the County.

> **Objective OSRC-14.1:** Increase energy conservation and improve energy efficiency in County government operations.
>
> **Objective OSRC-14.2:** Encourage County residents and businesses to increase energy conservation and improve energy efficiency.

Goal OSRC-15: Contribute to the supply of energy in the County primarily by increased reliance on renewable energy sources.

> **Objective OSRC-15.1:** Increase the development of renewable energy and distributed energy generation systems and facilities for County operations.
>
> **Objective OSRC-15.2:** Promote the use of renewable energy and distributed energy generation systems and facilities in new development in the County.
>
> **Objective OSRC-16.2:** Encourage reduced motor vehicle use as a means of reducing resultant air pollution.

Goal CT-1: Provide a well integrated and sustainable circulation and transit system that supports a city and community centered growth philosophy through a collaborative effort of all the Cities and the County.

> **Objective CT-1.4:** Reduce the need for future automobile use by a combination of improvements and land development policies that give equal favor to alternate modes as to automobile use.
>
> **Objective CT-1.7:** Reduce travel demand countywide by striving to provide in a jobs/housing balance of approximately 1.5 jobs per household, and encourage creation of jobs and housing in urbanized areas along the SMART passenger rail corridor and other transit centers.

Policy CT-1b: Focus commute and through traffic onto Highway 101. Designate major arterial routes to serve primarily as connectors between urban areas.

Policy CT-1d: Provide east west connectivity within each community, including interchange improvements, transit/rail stops, and pedestrian, bicycle, and other alternative transportation mode improvements that will improve access to Highway 101 and the rail/transit system.

Policy CT-1k: Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability.

Goal CT-2: Increase the opportunities, where appropriate, for transit systems, pedestrians, bicycling and other alternative modes to reduce the demand for automobile travel.

Objective CT-2.8: Provide bicycle and pedestrian links from bus stops and other transit facilities to residential areas, employment centers, schools, institutions, parks, and the greater roadway system in general, especially focusing on short trips that could result in a mode shift away from automobile travel.

Policy CT-2f: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system.

Policy CT-2g: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system.

4.5.3 Impact Analysis

a. Significance Thresholds

In accordance with Appendix G of the *CEQA Guidelines,* a significant energy impact would occur if new development carried out under the proposed project would do either of the following:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

b. Methodology

PRC Section 21100(b)(3) states that an EIR shall include "mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." The physical environmental impacts associated with the use of energy, including the generation of electricity and burning of fuels, are discussed in Section 4.2, *Air Quality*, and Section 4.7, *Greenhouse Gas Emissions*.

Construction

Construction energy use was assessed based on applicant-provided information, as detailed in Section 4.2, *Air Quality.* Proposed project construction is anticipated to start in 2027 at the earliest, which would include on- and off-road construction vehicles. If, for various site planning, financial, or other reasons, the onset of construction is delayed to a later date than assumed in the modeling analysis, construction impacts would be similar to or less than those analyzed, because a more

energy-efficient and cleaner burning standard construction equipment and vehicle fleet mix would be expected in the future. This is because the In-Use Off-Road Diesel Fueled Fleets regulations require construction equipment fleet operators to phase-in less polluting heavy-duty equipment and trucks over time. Construction energy consumption would result primarily from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers traveling to and from the project site. Construction activities can vary substantially from day to day, depending on the specific type of construction activity and the number of workers and vendors traveling to the project site. This analysis considers these factors and provides the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources. These construction energy estimates assume each piece of construction equipment would operate eight hours per day.

Transportation Fuels

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix, load factors, hours per day of use, and number of days of use provided in the CalEEMod construction output files included in Appendix E. The total horsepower was multiplied by the hours of use, days of use, load factor, and Compression-Ignition Engine Brake-Specific Fuel Consumption factor provided by the USEPA to estimate fuel usage (USEPA 2021). Fuel consumption from construction on-road worker trips and vendor and delivery/haul trucks was calculated using the trip rates and distances provided in the emissions modeling worksheets and CalEEMod construction output files. Total VMT for these on-road vehicles were then calculated for each type of construction-related trip and divided by the corresponding miles per gallon factor using the USDOT National Transportation Statistics (USDOT 2023a and 2023b). CalEEMod assumed trip lengths were used for worker commutes and vendor and haul truck trips. Refer to Appendix H for detailed energy calculations.

The construction equipment, vendor trucks, and haul trucks would primarily be diesel-fueled, while the construction worker commute vehicles would primarily be gasoline-fueled. For the purposes of this assessment, it is conservatively assumed that all heavy-duty construction equipment would be diesel-fueled. In addition, it is assumed the haul trucks would be diesel-fueled.

Operation

The CalEEMod Version 2022.1 was used to estimate energy source emissions resulting from the proposed project. Operational energy consumption are based on CalEEMod default assumptions for the proposed land use types in each buildout scenario. The default electricity consumption values in CalEEMod include the CEC-sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies. The 2022.1 CalEEMod currently incorporates California's 2019 Title 24 building energy efficiency standards. CalEEMod assumption values for residential, general office, and parking lot fixtures were used in the analysis. The CalEEMod results (Appendix E) provide the values used in this analysis to determine the anticipated energy consumption during construction and operation of the proposed project.

c. Project Impacts and Mitigation Measures

Threshold a:	Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact E-1 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD RESULT IN THE CONSUMPTION OF GASOLINE, DIESEL, AND ELECTRICITY; HOWEVER, THE PROPOSED PROJECT WOULD INCORPORATE DESIGN FEATURES REQUIRED BY THE MOST CURRENT TITLE 24 STANDARDS. THEREFORE, THE PROPOSED PROJECT WOULD NOT RESULT IN THE WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

Construction

During construction, the proposed project would consume fuels associated with the onsite use of equipment, off-site hauling of materials and supplies, and worker transportation. Under the Airborne Toxic Control Measure for diesel-fueled commercial motor vehicles (California Code of Regulations Section 2485), drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds would not idle the vehicle's primary diesel engine longer than five minutes at any location. Compliance with this regulation would prevent unnecessary consumption of energy from use of diesel fuel during construction. In addition, project construction phases do not typically rely on natural gas as an energy source. Therefore, substantial quantities of natural gas would not be consumed in support of project construction. The proposed project's demand for transportation fuels (gasoline and diesel) is provided in Table 4.5-1.

Table 4.5-1 Project Construction Energy Use

Source	Total Energy Consumption
Transportation Fuels	
Gasoline	**164,824 gal**
Office Site	4,911 gal
Residential Site	159,914 gal
Diesel	
On-Road Haul Trucks[1]	13,685 gal diesel
On-Road Vendor Trucks	58,591 gal diesel
Office Site	4,831 gal diesel
Residential Site	53,760 gal diesel
Off-Road Construction Equipment	71,688 gal diesel
Office Site	23,930 gal diesel
Residential Site	47,758 gal diesel
Diesel Total	**143,964 gal diesel**

Notes: gal = gallons

[1]Haul trips would only occur during demolition on the office site portion of the project.

Source: Appendix H

The fuel consumption that is necessary to power off-road equipment is based on the quantity and type of equipment that would be used for each construction phase, the duration of use each day, the total construction period duration, and the hourly construction equipment fuel consumption factors that are made available by the OFFROAD model. On-road equipment includes haul trucks and vendor trucks, which would be powered by diesel fuel, as well as vehicles associated with construction worker commuter trips, which are assumed to be powered by gasoline. The fuel consumption for on-road trucks is based on fuel consumption information from the USDOT's National Transportation Statistics (USDOT 2021). The fuel demand for construction worker commuter trips is based on the estimated number of workers for each phase of construction and the average distance that workers travel from CalEEMod, as well as on the emissions factors from the EMFAC model.

As shown in Table 4.5-1, project construction activities would result in the consumption of approximately 143,964 gallons of diesel fuel and 164,824 gallons of gasoline. Energy use during demolition and construction would be temporary and limited to the construction phase. The construction equipment fleet would be typical for the region and would comply with all applicable State and local regulations regarding equipment efficiency and construction practices. Therefore, construction activities would result in a less than significant impact related to the wasteful, inefficient, and unnecessary consumption of energy.

Operation

During operations, the proposed project would consume energy for vehicle trips, water conveyance, solid waste disposal systems, lighting, and to operate electronic equipment and devices and HVAC systems. The project's energy consumption is determined by land use subtypes, land use acreage, and building square footage. Specifically, the proposed project would include one office building, a single-story structure to house the Emergency Coordination Center, covered surface parking with a solar micro-grid, 20,000 square feet of retail/commercial uses, and up to 1,500 residential units. The proposed project's estimated energy use during operations is summarized in Table 4.5-2.

Table 4.5-2 Net Project Operational Energy Use

Source	Energy Consumption per Year
Electricity	**6.08 GWh**
Residential	4.79 GWh
Office Building	1.32 GWh
Parking Lot	(0.28) GWh
Retail/Commercial	0.17 GWh
Transportation Fuels	
Gasoline	563,645 gallons
Diesel	86,818 gallons

Notes: GWh = gigawatt-hours; MMBTU = Million British Thermal Units

Values in parentheses indicate net reductions in energy consumption from existing conditions.

Source: Appendix E

The proposed project would generate additional demand for electricity from PG&E. As estimated by CalEEMod, the proposed project's total net electricity demand would be approximately 5,998,610 kilowatt hours per year (kWh/year) or 6.04 gigawatt hours per year (GWh/year). The proposed

project's total electricity demand would be less than one hundredth of a percent of PG&E's projected total energy to serve load of 113,916 GWh in 2028 (CEC 2024a). Therefore, the proposed project would not result in a substantial increase in electricity demand compared to available supply. In addition, the proposed project would be required to comply with the applicable portions of the CEC and CALGreen Code, which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. By required compliance with applicable regulations and continued energy efficient programs implemented by PG&E, the project's potential impacts regarding wasteful or inefficient use of electricity and natural gas would be less than significant.

As shown in the Operational Fuel Use worksheet provided in Appendix H regarding vehicle use, the proposed project would generate approximately 12,731,784 net VMT annually, 95 percent of which would comprise light-duty vehicles with a gross vehicle weight rating (GVWR) of up to 8,500 pounds, and approximately five percent of which would comprise heavy-duty vehicles (GVWR > 8,500 pound). For this analysis, light-duty vehicles are considered gasoline-powered and heavy-duty vehicles are considered diesel-fueled. After complete project build-out, operation of the proposed project would generate approximately 12,053,817 annual VMT with gasoline-fueled vehicles, and approximately 677,178 annual VMT with diesel-fueled vehicles. Based on the State's projected fleet fuel mileage for 2023, after completing project build-out, annual operation of the proposed project would require transportation fuels of approximately 563,645 gallons of gasoline, and approximately 86,818 gallons of diesel fuel. Diesel usage is anticipated during operation due to the default fleet mix derived from EMFAC2021 v1.0.1, which includes diesel vehicles reflecting the operational year fleet mix-average for the selected analysis scale, such as County or air basin. The anticipated transportation activity would be insignificant compared to the County's total energy consumption. As described in Section 4.4.1(e), *Transportation Energy,* the project's gasoline consumption and diesel fuel consumption represent less than one hundredth of a percent of Sonoma County's total gasoline and diesel sales. Therefore, the proposed project's potential to result in impacts regarding wasteful or inefficient use of transportation fuels would be less than significant.

The design of the proposed project is required to comply with all standards set in the latest iteration of the California Building Standards Code (CCR Title 24). California's CALGreen standards (CCR Title 24, Part 11) require implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2022 Building Energy Efficiency Standards (CCR Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, per CALGreen, all plumbing fixtures used for the proposed project would be high-efficiency fixtures, which would minimize the potential for the inefficient or wasteful consumption of energy related to water and wastewater.

In summary, the proposed project would result in the consumption of energy in the forms of electricity and transportation fuels. The proposed project would be required to comply with federal, State, and local regulations aimed to reduce the inefficient, wasteful, and unnecessary consumption of energy. The proposed project's electricity would be negligible compared to the energy demand for PG&E service areas. Therefore, the proposed project's energy requirements and its energy use efficiencies would result in a less than significant impact related to the wasteful, inefficient, and unnecessary consumption of energy.

Mitigation Measures

Compliance with existing regulations would reduce the proposed project's potential impact to a less than significant level by ensuring energy efficiencies are incorporated into project design and operation. No mitigation would be required.

Threshold b:	Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact E-2 THE PROPOSED PROJECT WOULD CONSUME ENERGY BUT WOULD NOT CONFLICT WITH THE COUNTY OF SONOMA CLIMATE PLAN, COUNTY OF SONOMA GENERAL PLAN, AND ABAG'S PLAN BAY AREA 2050. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Office Site

The County of Sonoma Climate Plan contains measures intended to increase energy efficiency in Sonoma County. The project would comply with measures E-CO-5, E-CO-6, and E-CO-9 by enhancing energy resilience, reducing energy use, and supporting decarbonization through a one megawatt microgrid with onsite battery storage, installation of all electric appliances, incorporate energy efficient appliances, and Mitigation Measure GHG-1 Tier 2 voluntary EV infrastructure, consistent with the latest CALGreen requirements. In addition, the office site would comply with State Building Energy Efficiency Standards for nonresidential uses, in compliance with the Climate Plan's measures E-CO-8, T-CO-1, and T-CO-5.

The Sonoma Climate Mobilization Strategy outlines 13 priority actions under local authority across key focus areas including energy, transportation, buildings, waste, natural and working lands, and community resilience. Based on the aforementioned Mitigation Measure GHG-1, green building and project design features above, the project would be consistent with Sonoma Climate Mobilization Strategy's all-electric campaign, , EV access for all partnership, and energy grid for the future by incorporating all electric appliances, solar microgrid onsite, and Tier 2 voluntary EV infrastructure.

Residential Site

Future development on the residential site would occur on County-owned land; therefore, this analysis evaluates consistency with the Climate Plan. The residential site would incorporate all-electric appliances and Mitigation Measure GHG-1 Tier 2 EV infrastructure, consistent with the latest CALGreen Standards. Therefore, the project would be consistent with Climate Plan measures E-CO-5, E-CO-6, and E-CO-9. The project would also comply with the latest Title 24 Standards through the installation of energy- and water-efficient appliances, consistent with Climate Plan measures E-CO-8 and W-CO-5. In addition, these green building features and design elements would further support the Sonoma Climate Mobilization Strategy's All-Electric Buildings Campaign and Carbon-Free Electricity strategies.

Overall Project (Office and Residential Sites)

The County of Sonoma contains measures intended to increase energy efficiency and expand the use of renewable energy in Sonoma County. As described under Impact E-1, the proposed project would comply with CALGreen, and the state's Building Energy Efficiency Standards. The proposed project would also comply with the County of Sonoma General Plan Goal OSRC-14, which promotes energy conservation and reduces energy demand in the County by adhering to the latest Title 24 Building Energy Efficiency Standards. Further, the proposed project would install a solar microgrid

onsite, which would be consistent with the County's General Plan Goal OSRC-15, which encourages projects to contribute to the supply of energy in the County primarily through renewable energy sources.

Regarding transportation related energy usage, the proposed project would not conflict with the goals of ABAG's Plan Bay Area 2050, which incorporates VMT targets established by SB 375. Plan Bay Area 2050 supports a growing economy, provides more housing and transportation choices and reduces transportation-related pollution. The proposed project would comply with the latest Title 24 CALGreen Standards and incorporate Mitigation Measure GHG-1, EV infrastructure structure consistent with residential and non-residential land uses. The project site is located approximately half a mile from the Santa Rosa City Bus route along Mendocino Avenue, near the intersection with Administration Drive. Additionally, the Sonoma-Marin Area Rail Transit (SMART) Santa Rosa North Station is situated about 1.7 miles from the site. In addition, the project is served by Sonoma County Transit's Route 30x, 44, and 48, with a bus stop adjacent to the site at Administration Drive and Ventura Avenue and an additional stop located within the project site at the County Administrative Center along Ventura Avenue. These nearby public transit options could potentially reduce the reliance of single motor vehicle use and encourage alternative modes of transportation. The project is also surrounded by existing residential and commercial developments, enhancing connectivity and potentially reducing VMT by providing convenient access to nearby land uses. Therefore, the proposed project aligns with Plan Bay Area 2050 goal of providing more transportation choices to reduce transportation-related pollution.

Overall, compliance with existing regulations would reduce the proposed project's potential impact to a less than significant level by ensuring energy efficiencies are incorporated into project design and operation, consistent with state and local plans and regulations. Impacts would be less than significant.

Mitigation Measures

No mitigation would be required.

4.5.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for analysis of the cumulative impacts of energy consumption is Sonoma County. This geographic scope is appropriate because the smallest scale at which energy consumption information is readily available is the county level.

The geographic scope for cumulative energy impacts includes the geographic area of the County of Sonoma. This geographic scope is appropriate as development facilitated by the proposed project and cumulative development would increase energy demands in Sonoma County. Cumulative development would increase demand for energy resources; however, new iterations of the California Building Energy Efficiency Standards and CALGreen would require increasingly more efficient appliances and building materials that reduce energy consumption in new development. As described under Impact E-1, the proposed project would be built in accordance with the California Building Energy Efficiency Standards and CALGreen. The proposed project's electricity consumption would be less than one hundredth of a percent of all projected low-demand supply in PG&E in 2028. In addition, the proposed project would result in a net increase of approximately 86,818 gallons of diesel fuel and 563,645 gallons of gasoline use for transportation fuels per year. The proposed

project's transportation fuel usage would represent a small percentage of total fuel consumption within Sonoma County. Additionally, the proposed project would reduce VMT and associated transportation fuel use, by its location to high quality public transit options and connectivity to other urban uses. Therefore, the proposed project would not contribute to a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. While it is speculative to assess transportation fuel usage from cumulative projects (refer to Table 3-1 of Chapter 3, *Environmental Setting*), it is expected that cumulative transportation fuel usage resulting from the proposed project and cumulative projects, including projects throughout the county, would be required to be consistent with projections regarding future transportation fuel usage and supply. Additionally, the proposed project would include an onsite solar micro-grid and receive electricity that would be procured in compliance with SB 1020, which would promote the use of renewable energy. Therefore, the proposed project would not contribute to a cumulatively considerable impact associated with a conflict with or obstruction of State or local plan for renewable energy or energy efficiency. All other pending and future projects in the County would be required to adhere to General Plan policies to mitigate energy impacts where feasible. In addition, all pending and future projects within the City of Santa Rosa would be reviewed for consistency with the City General Plan. Compliance with applicable plans, policies, and regulations would require increasingly more efficient energy use, and cumulative impacts related to energy (Impact E-1 and E-2) would be less than significant.

4.6 Geology and Soils

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

4.6.1 Setting

a. Regional Geologic Setting

The City of Santa Rosa, including the project site, lies within the geologic region of California referred to as the Coast Ranges geomorphic province. The Coast Ranges province lies between the Pacific Ocean and the Great Valley (Sacramento and San Joaquin valleys) provinces and stretches from the Oregon border to the Santa Ynez Mountains near Santa Barbara. Much of the Coast Range province is composed of marine sedimentary deposits and volcanic rocks that form northwest trending mountain ridges and valleys, running subparallel to the San Andres Fault Zone. The relatively thick marine sediments dip east beneath the alluvium of the Great Valley. The Coast Ranges can be further divided into the northern and southern ranges which are separated by the San Francisco Bay. The San Francisco Bay lies within a broad depression created from an east-west expansion between the San Andres and the Hayward fault systems.

The Northern Coast Ranges are comprised largely of the Franciscan Complex or Assemblage, which consists primarily of graywacke, shale, greenstone (altered volcanic rocks), basalt, chert (ancient silica-rich ocean deposits), and sandstone that originated as ancient sea floor sediments. Franciscan rocks are overlain by volcanic cones and flows of the Quien Sabe, Sonoma and Clear Lake volcanic fields (California Geological Survey 2002).

The City of Santa Rosa lies within the northeastern portion of the Cotati valley found along the Santa Rosa Plain and also includes part of the Sonoma Mountains to the east. The city is situated at the confluence of Matanzas Creek and Santa Rosa Creek, both of which originate from the Sonoma Mountains to the east. The Santa Rosa Plain slopes gently towards the west, away from the uplands, towards the lowest elevations of Cotati Valley. Elevations within the planning area range from between 120 to 200 feet above mean sea level in the downtown area of Santa Rosa where slopes are generally less than 5 percent to upwards of 900 feet above mean sea level in the upland areas where slopes range from 15 to 50 percent. Eastern valleys such as Rincon Valley and Bennett Valley are considered the low intervening valleys that are 200 to 300 feet above mean sea level with gentle slopes ranging from 0 to 15 percent.

In general, Santa Rosa is underlain by volcanic flow deposits known as the Sonoma Volcanics, sedimentary rocks known as the Petaluma Formation, and alluvial deposits. The Sonoma Volcanics formed during volcanic activity in the region approximately 3 to 6 million years ago and are generally found in the hilly upland areas. The Petaluma Formation is similar in age and consists of claystones, siltsones, and mudstones formed from the deposition of eroded materials in the upland areas. The alluvial deposits have been divided into the younger Huichia Formation and the Glen Ellen Formation which consist of gravels, silt, sands, and clays found predominately in the lower valley areas east of Santa Rosa. Recent alluvial sediments deposited after the aforementioned formations are divided into younger and older deposits. The older deposits are considered to be older alluvial fan deposits, dissected by river action and consist of gravels from the nearby Rodgers

Creek Fault Zone. The younger alluvial sediments consist of gravels, sands, silts, and clays. These deposits fill the valleys and originated from continued erosion of the upland areas.

b. Local Geologic Setting

Seismic Hazards

Like much of California, the City of Santa Rosa, including the project site, is subject to risks associated with potentially destructive earthquakes. Earthquakes are most common along geologic faults, which are planes of weakness or fractures along which rocks have been displaced. The project site is near active faults, such as the San Andreas Fault, Rogers Creek Fault, Healdsburg Fault, Mayacama Fault, and West Napa Fault (California Department of Conservation [DOC] 2025). Regional hazards with respect to earthquakes are considered significant due to the city's proximity to major faults in the area (e.g., San Andreas and Hayward) and the project site's proximity to minor faults listed above (e.g., Rogers Creek Fault, Healdsburg Fault, etc.).

The probability of one or more earthquakes of magnitude 6.7 (Richter scale) or higher occurring in the San Francisco Bay Area has been evaluated by the U.S. Geological Survey. Based on the results of the U.S. Geological Survey evaluation, there is a 63-percent likelihood that such an earthquake event will occur in the Bay Area between 2007 and 2036. The faults with the greater probability of movement with a magnitude of 6.7 or higher earthquake are the Hayward Fault at 27 percent, the San Andreas Fault at 21 percent, and the Calaveras Fault at 11 percent (U.S. Geological Survey 2008).

Faults

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

Rodgers Creek Fault Zone

The Rodgers Creek Fault runs through the northern San Francisco Bay Area and runs through the central part of the City of Santa Rosa. The Rodgers Creek Fault also links two active faults: the Hayward Fault to the southeast and the Mayacama Fault to the northwest. It is located approximately 0.3-mile east of the project area (California Department of Conservation, California Geological Survey, 2025). The Rodgers Creek Fault is seismically active, and two intermediate magnitude (5.6 and 5.7 movement magnitude [Mw]) earthquakes occurred near Santa Rosa in 1969.

There is also evidence that the fault slipped approximately 2 meters (Mw of about 7) in the 18th century (Funning et. Al 2007).

Healdsburg Fault

The Healdsburg Fault is an active fault located approximately 15 miles northwest of the City of Santa Rosa. The Healdsburg Fault extends north from the Rodgers creek fault in Santa Rosa and generally follows a path that is parallel to the San Andreas Fault and is capable of a 7.5 magnitude earthquake. This fault is a northern extension of the Rodgers Creek Fault, which is part of the Hayward Fault System. The fault is characterized as a right-lateral strike slip fault.

Mayacama Fault

The Mayacama Fault is an active fault located to the northwest of the City of Santa Rosa. The fault generally follows a path that is parallel to the San Andreas Fault and is capable of a 7.5 magnitude earthquake. This fault is the northern-most extension of Hayward Fault System. The fault is characterized as a right-lateral slip fault. There are no historical reports of land rupture; however, geologists estimate the most recent rupture to have occurred sometime between 1520 and 1660. (California Geological Survey 2002).

San Andres Fault Zone

This fault zone runs southeast to northwest and is located approximately 20 miles west of the City of Santa Rosa. The fault zone extends over 700 miles from the Gulf of California north to the Cape Mendocino area where it continues northward along the ocean floor. The length of the fault and its active seismic history indicates that it has a very high potential for large-scale movement in the near future (7.9 Mw). The most recent large earthquake on the San Andreas Fault to affect the Bay Area was the Loma Prieta earthquake in 1989, which had a Mw of 6.9.

West Napa Fault Zone

The West Napa fault is located approximately 30 miles southeast of the City of Santa Rosa. The fault is associated with an approximately 35-mile-long zone of late Quaternary deformation that trends along the western margin of the Napa Valley from near the City of St. Helena on the north to Carquinez Strait on the south.

Tolay Fault Zone

The Tolay Fault is located approximately 20 miles southeast of the City of Santa Rosa and is considered an extension of the Hayward Fault. There has been no significant strike-slip offset along the fault zone in geologically-recent time (Langenheim et al. 2010).

Surface Rapture

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

The Alquist-Priolo Act regulates development near active faults to mitigate the hazard of surface fault rupture (see Section 4.6.2, *Regulatory Setting*). According to the California Department of Conservation, California Geological Survey, the project site is not within a known earthquake fault zone subject to rupture. The nearest known earthquake fault zone, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist, is the Rogers Creek Fault Zone. The Rogers Creek Fault Zone is approximately 0.3-mile east of the project site (California Department of Conservation, California Geological Survey, 2025).

Groundshaking

The major cause of structural damage from earthquakes is ground shaking. The intensity of ground motion expected at a particular site depends upon the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property. Greater movement can be expected at sites located on poorly consolidated material such as alluvium, within close proximity to the ruptured fault, or in response to a seismic event of great magnitude. Historically, the City of Santa Rosa has been impacted by ground shaking during major earthquakes in the seismically active Northern California region. Therefore, the project site is likely to experience ground shaking from major earthquakes in the future.

Liquefaction

Liquefaction is a seismic phenomenon in which loose, saturated granular and non-plastic fine-grained soils lose their structure/strength when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: 1) shallow groundwater within the top 50 feet of the ground surface; 2) low-density non-plastic soils; and 3) high-intensity ground motion. The risk of liquefaction within the city is generally very low, with areas of high elevation and steeper slopes located in the foothills in northeast Santa Rosa having increased risks of liquefaction. Liquefaction risk at the project site is characterized as very low (ABAG 2025).

Landslides and Slope Stability

Seismic ground shaking can also result in landslides and other slope instability issues. Landslides occur when slopes become unstable, and masses of earth material move downslope. Landslides are usually rapid events, often triggered during periods of rainfall or by earthquakes. Mudslides and slumps are a shallower type of slope failure. They typically affect the upper surficial soils horizons rather than bedrock features. Usually, mudslides and slumps occur during or soon after periods of rainfall, but they can be triggered by seismic shaking. The area's most susceptible to landslides are shown on maps prepared by the California Division of Mines and Geology. Landslide susceptibility is grouped into classes ranging from zero to ten, which are calculated based upon a combination of rock strength and slope. Classes seven through ten indicate very high landslide susceptibility and include both very steep slopes in hard rocks and moderate to very steep slopes in weak rocks (California Geological Survey 2011). In addition, landslides occur where faults have fractured rock and along the base of slopes or cliffs where supporting material has been removed by stream or wave erosion, or human activities. Heavy rainfall, human actions, or earthquakes can trigger landslides. They may take the form of a slow continuous movement such as a slump or may move very rapidly as a semi-liquid mass such as a debris flow or avalanche. Landslide susceptibility within the City of Santa Rosa ranges from very low to moderate. The project site has low susceptibility to landslides because the site is nearly flat and not adjacent to slopes.

Subsidence

Subsidence or settlement can occur from immediate settlement, consolidation, shrinkage of expansive soil, and liquefaction. Immediate settlement occurs when a load from a structure or placement of new fill material is applied, causing distortion in the underlying materials. This settlement occurs quickly and is typically complete after placement of the final load. Consolidation settlement occurs in saturated clay from the volume change caused by squeezing out water from the pore spaces. Consolidation occurs over a period and is followed by secondary compression, which is a continued change in void ratio (ratio of the volume of voids to volume of solids) under the continued application of the load. Soils tend to settle at different rates and by varying amounts depending on the load weight or changes in properties over an area, which is referred to as differential settlement. Areas underlain by soft sediments or undocumented fills are most prone to settlement.

According to the Natural Resources Conservation Service, portions of the project site are subject to subsidence (Natural Resources Conservation Service, 2025). Portions of the project site identified with subsidence potential include both the residential site and the Office site.

Expansive Soils

Expansive soils swell with increases in moisture content and shrink with decreases in moisture content. These soils usually contain high clay content. Foundations for structures constructed on expansive soils require special design considerations. Because expansive soils can expand when wet and shrink when dry, they can cause foundations, basement walls, and floors to crack, causing substantial structural damage. As such, structural failure due to expansive soils near the ground surface is a potential hazard. Shrink-swell potential throughout the city is low. The project site contains clay soil (Natural Resources Conversation Service, 2025). However, expansive soils are likely not present at the site because the site is developed with the current County government center and paved parking lots, with no known damage resulting from underlying expansive soils. Likewise, the construction of existing development on the site likely altered the clayey soils that the Natural Resources Conservation Service mapped on the project site.

Soil Erosion

Erosion refers to the removal of soil by water or wind. Factors that influence erosion include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. Depending on how well protected the soil is from these forces, the erosion process can be very slow or rapid. Properties of the soil also contribute to how likely or unlikely it is to erode. Removal of natural or man-made protection can result in substantial soil erosion and excessive sedimentation and pollution problems in streams, lakes, and estuaries through a process called siltation. Risk of soil erosion throughout the City of Santa Rosa is relatively low, with higher rates of erosion present along the northeastern portion of the city in the foothills. Risk of soil erosion at the project site is moderate (City of Santa Rosa 2009). However, existing development of the site includes County buildings, paved parking lots, and landscaping, all of which reduce erosion potential.

Paleontological Resources

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces

thereof (e.g., trackways, imprints, burrows, etc.). Paleontological resources are not found in "soil" but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are usually preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources.

The geologic unit underlying the project site is entirely recent (i.e., Holocene), quaternary-aged alluvium (California Department of Conservation, 1963). Recent quaternary-aged alluvium is considered to have low potential to yield fossils (Bureau of Land Management, 2018).

4.6.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCB). The City of Santa Rosa is located within the North Coast RWQCB jurisdiction.

Projects within the city and Sonoma County that disturb more than one acre are required to obtain NPDES coverage under the California General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The Construction General Permit (Order 2022-0057-DWQ) requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) describing best management practices (BMPs) that the discharger would use to prevent and retain storm water runoff and to prevent soil erosion.

Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)

The Stafford Act (1988) provides the legal basis for state, tribal, and local governments to undertake risk-based approaches to reducing natural hazard risks through mitigation planning. Specifically, the Stafford Act requires state, tribal, and local governments to develop and adopt Federal Emergency Management Agency (FEMA)-approved hazard mitigation plans as a condition for receiving certain types of non-emergency disaster assistance. The Act also authorizes grants for pre- and post-disaster projects and planning.

Disaster Mitigation Act of 2000

Congress passed the Disaster Mitigation Act of 2000 to amend the Robert T. Stafford Disaster Relief and Emergency Assistance Act by invoking new and revitalized approaches to mitigation planning. Section 322 of the Act emphasized the need for state and local government entities to closely

coordinate mitigation planning activities and makes the development of a hazard mitigation plan a specific eligibility requirement for local governments applying for federal mitigation grant funds. Communities with an adopted and federally approved hazard mitigation plan thereby become pre-positioned and more apt to receive available mitigation funds before and after the next declared disaster.

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

b. State Regulations

California Building Code

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

California Public Resources Code

Section 5097.5 of the Public Resources Code states:

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

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

Alquist-Priolo Earthquake Fault Zoning Act

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

siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. This Alquist-Priolo Act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive.

Seismic Hazards Mapping Act

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

c. Local Regulations

Phase I Municipal Stormwater Permit

Phase I Municipal Stormwater Permit

The City of Santa Rosa and the unincorporated County of Sonoma are co-permittees of the National Pollutant Discharge Elimination System Permit and Waste Discharge Requirements for Discharges From the Municipal Separate Storm Sewer Systems (North Coast MS4 Permit), Order R1-2015-0030, NPDES No. CA0025054. The North Coast MS4 Permit regulates discharges into the MS4 system in the cities and county areas within Sonoma County.

All new development or redevelopment projects that create or replace 10,000 square feet of impervious surfaces are subject to post-construction BMP implementation, also known as Low Impact Development (LID). Projects that create or replace more than one acre of impervious surface are also required to comply with the hydromodification provisions of the MS4 permit, which requires capturing and retaining 100 percent of the volume of runoff generated by a 1.0-inch rainfall event over a 24-hour period.

The City of Santa Rosa has published a *Low-Impact Development Technical Design Manual* (City of Santa Rosa LID Technical Manual) which provides requirements to reduce storm water pollution in accordance with the North Coast MS4 Permit. The City of Santa Rosa LID Technical Manual includes and prioritizes LID BMPs to detain, retain, and treat runoff. LID BMPs incorporate and conserve on-site natural features, together with constructed hydrologic controls to more closely mimic pre-development hydrology and watershed processes. Because the County of Sonoma does not have a published LID design manual, it utilizes the City of Santa Rosa LID Technical Manual for MS4 compliance.

Sonoma County Multijurisdictional Hazard Mitigation Plan

The County of Sonoma's Multijurisdictional Hazard Mitigation Plan, updated in 2021, establishes and promotes a comprehensive mitigation policy and program to protect the health, safety, and welfare of residents within Sonoma County. The Multijurisdictional Hazard Mitigation Plan

addresses geologic hazards, including shaking and liquefaction, and implements mitigation regarding earthquake hazards. The Multijurisdictional Hazard Mitigation Plan:

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

Sonoma County Municipal Code

Chapter 7 of the Sonoma County Municipal Code contains the building regulations for unincorporated Sonoma County. Section 7-13 of the Sonoma County Municipal Code incorporates the California Building Code by reference, as well as several other State building codes, such as the California Residential Code.

Chapter 11 of the Sonoma County Municipal Code, also referred to as the Sonoma County Construction Grading and Drainage Ordinance, regulates construction grading and drainage in the unincorporated area of the county. According to Section 11.02.040, all construction grading and drainage in unincorporated Sonoma County is subject to this ordinance except limited exceptions for timber operations. Section 11.04.010, Subsection A requires a construction grading permit prior to commencing any construction grading or related work, including preparatory land clearing, vegetation removal, or other ground disturbance, except where exempted from permit requirements by Subsection C. Section 11.06.010, Subsection A requires a construction drainage permit prior to commencing any construction drainage involving construction or modification of drainage facilities or related work, including preparatory land clearing, vegetation removal, or other ground disturbance, except where exempted from permit requirements by Subsection C. Section 11.14.020 of the Code states that where construction grading is within an MS4 permit boundary, the construction grading shall comply with the applicable standards and provisions of the MS4 permit. Section 11.14.040, Subsection D, states that drainage facilities and systems shall prevent or minimize soil loss through the use of storm drain culverts (pipes), storm drain inlets and outlets, storm drain outfalls, revegetation of exposed or disturbed slopes, minimizing cross drains through road outsloping, minimizing the use of artificial slopes, and other best management practices.

Chapter 11 of the Sonoma County Municipal Code also sets forth requirements to prevent soil loss and erosion during construction. Section 11.14.080, Subsection A, states that topsoil removed in preparation for construction grading and drainage must be stored on or near the site and protected to prevent soil loss while the work is underway. Topsoil shall be restored to disturbed surfaces prior to revegetation. Section 11.14.080, Subsection B, states that mulching, seeding, planting of groundcover, shrubs, or trees, or other suitable stabilization measures shall be used to protect disturbed surfaces to minimize soil loss.

Sonoma County General Plan

The Sonoma County General Plan provides goals, objectives, policies, and programs intended to prevent or reduce geologic hazards and risks and reduce soil erosion. The General Plan goals, policies, and programs applicable to the analysis in this EIR include:

Goal PS-1: Prevent unnecessary exposure of people and property to risks of damage or injury from earthquakes, landslides, and other geologic hazards.

Objective PS-1.2: Regulate new development to reduce the risks of damage and injury from known geologic hazards to acceptable levels.

Objective PS-1.3: Use the Sonoma County Hazard Mitigation Plan to help reduce future damage from geologic hazards.

Policy PS-1f: Require and review geologic reports prior to decisions on any project which would subject property or persons to significant risks from the geologic hazards areas shown on Public Safety Element hazard maps and related file maps and source documents. Geologic reports shall describe the hazards and include mitigation measures to reduce risks to acceptable levels. Where appropriate, require an engineer's or geologist's certification that risks have been mitigated to an acceptable level and, if indicated, obtain indemnification or insurance from the engineer, geologist, or developer to minimize County exposure to liability.

Policy PS-1g: Prohibit structures intended for human occupancy (or defined as a "project" in the Alquist-Priolo Special Studies Zones Act and related Administrative Code provisions) within 50 feet of the surface trace of any fault.

Policy PS-1h: Adopt, upon approval by the International Code Council (ICC) and the State of California, revisions to the Uniform Building Code which increase resistance of structures to groundshaking and other geologic hazards.

Policy PS-1k: Incorporate measures to mitigate identified geologic hazards for all County roads, public facilities, and other County projects to an acceptable level.

Policy PS-1l: Use the following criteria in siting and design of essential service buildings and facilities, particularly those of high public occupancy:

(1) To the extent feasible, avoid siting such buildings and facilities in areas subject to a Modified Mercalli Index (MMI) Groundshaking Intensity Level of Very Violent (X), Violent (IX), or Very Strong (IIX) as shown on Figures PS-1a (of the General Plan).
(2) Where such buildings and facilities must be located in the above areas, design and construct them to the highest feasible safety standard.

Objective OSRC-11.1: Ensure that permitted uses are compatible with reducing potential damage due to soil erosion.

Objective OSRC-11.2: Establish ways to prevent soil erosion and restore areas damaged by erosion.

Policy OSRC-11b: Include erosion control measures for any discretionary project involving construction or grading near waterways or on lands with slopes over 10 percent.

Policy WR-1g: Minimize deposition and discharge of sediment, debris, waste and other pollutants into surface runoff, drainage systems, surface water bodies, and groundwater.

Policy WR-1h: Require grading plans to include measures to avoid soil erosion and consider upgrading requirements as needed to avoid sedimentation in stormwater to the maximum extent practicable.

Water Resources Program 5: Grading Ordinance and Erosion and Sediment Control. Prepare, adopt, and implement a revised grading, erosion and sediment control ordinance to include slope-related standards and standards for orchards and vineyards.

Santa Rosa General Plan 2050

While the County is not subject to the City's building and zoning laws, the County does intend, where appropriate and feasible, to work with the City to avoid land use conflicts. Accordingly, City of Santa Rosa regulations are provided for informational purposes.

The City of Santa Rosa General Plan sets forth the following guiding and implementing policies relevant to geology, soils, and seismicity:

Policy 5-1.1: Prior to new development approval, where there are known geological hazards as shown on Figures 5-2, 5-3, and 5- 4 and current maps from the United States Geological Survey, California Geological Survey, California Department of Water Resources, California Office of Emergency Services, the City shall ensure that new development, redevelopment, and major remodels shall avoid or adequately mitigate seismic and geologic hazards through the preparation of a site-specific geologic study prepared by a California Certified Engineering Geologists and/or Geotechnical Engineer and compliance with identified measures.

Policy 5-1.2: Promote erosion-control strategies that reduce hazards to structures, properties, and drainages.

4.6.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Impacts to geology and soils were determined by reviewing the existing setting for the project site, as summarized in Section 4.6.1, *Setting*, and analyzing the project's potential to result in substantial adverse effects related to geological hazards.

Significance Thresholds

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

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;
    b. Strong seismic ground shaking;
    c. Seismic-related ground failure, including liquefaction; or
    d. Landslides;
2. Result in substantial soil erosion or the loss of topsoil;

3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

b. Project Impacts and Mitigation Measures

Threshold 1a:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Impact GEO-1 THE PROJECT IS NOT WITHIN AN ALQUIST-PRIOLO FAULT ZONE. FURTHER, THE PROPOSED PROJECT WOULD NOT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING RISK OF LOSS, INJURY OR DEATH INVOLVING RUPTURE OF A KNOWN EARTHQUAKE FAULT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

There are no active or inactive faults that cross the project site; the site is not located within an Earthquake Fault Zone designated by the state under the Alquist-Priolo Earthquake Fault Zoning Map (California Department of Conservation, California Geological Survey, 2025). Additionally, the office site of the project would reduce the number of government structures subject to risk of geologic hazards from six to two (i.e., new office building and new emergency coordination center), while also updating these facilities to meet current building codes, thereby reducing potential impacts associated with seismic and other geologic risks. The proposed residential site of the project would increase the number of people present on the project site due to the addition of 1,500 residential units and 20,000 square feet of retail/commercial space. The proposed project would accommodate an increase of approximately 50 additional employees (18 at the office site and 32 at the residential site). However, as the project site is not within an earthquake fault rupture zone, there would be no risk of rupture to residents, visitors, employees, or customers. As such, the proposed project would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact GEO-2 THE PROPOSED PROJECT WOULD DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING STRONG SEISMIC GROUND SHAKING AND GROUND FAILURE, INCLUDING LIQUEFACTION. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION.

Office Site

The office site of the project would involve construction of new County buildings within a seismically active area. The nearest fault is the Rodgers Creek Fault, approximately 0.3 mile east of the office site. An earthquake on this or other regional faults could cause seismic ground shaking and seismic-related ground failure, including liquefaction.

Potential structural damage and the exposure of people to the risk of injury or death from structural failure could occur from shaking or ground failure. However, these risks would be minimized by compliance with the California Building Code (CBC), which requires engineering design and construction measures to resist seismic forces. Section 1803.11 of the CBC requires geotechnical investigations for structures in Seismic Design Categories D and E, which include Sonoma County. The geotechnical report must evaluate slope instability, liquefaction, settlement, and later spreading, and recommend measures such as soil moisture conditioning, compaction, and foundation design (e.g., post-tensioned slab).

The office site would not substantially increase the number of employees (18 additional employees) compared to existing conditions, so exposure to seismic hazards would remain similar. Incorporating CBC requirements and geotechnical recommendations would reduce impacts to less than significant. If the project does not implement these recommendations, impacts would be potentially significant, and mitigation is required.

Residential Site

The residential site would add new housing units and 20,000 square feet of retail/commercial space, and 32 additional employees, increasing the number of people exposed to seismic hazards. Similar to the office site of the proposed project, the residential site is subject to strong ground shaking and potential liquefaction during an earthquake.

Compliance with CBC requirements and preparation of a geotechnical report would minimize risks to life and property. The report would address liquefaction potential and provide construction recommendations to reduce hazards. Although seismic risk cannot be eliminated, adherence to CBC standards and geotechnical recommendations would reduce impacts to less than significant. Failure to implement these recommendations would result in potentially significant impacts, requiring mitigation.

Mitigation Measures

GEO-1 Incorporation of a Geotechnical Investigation or Investigations Prior to Grading Activities

A geotechnical investigation or investigations shall be prepared for the office site and residential site pursuant to section 1803.5.11 of the California Building Code. For example, a geotechnical investigation could be prepared for the entire site, or separate investigations may be prepared for the office site and the residential site. In no case shall site grading commence in an area where no geotechnical investigation has been prepared and provided to the County. Prior to issuance of a grading permit, all recommendations included in the geotechnical investigation or investigations shall be incorporated into the project design by inclusion on the construction/civil plan set. For example, the grading plan and building plan sets shall contain the recommendations provided in the geotechnical investigation.

Significance After Mitigation

Mitigation Measure GEO-1 would require site-specific geotechnical investigations to be prepared before any grading begins which would identify soil conditions, groundwater levels, and the potential for liquefaction. This mitigation measure also requires that all recommendations be included in the project's grading and construction plans before permits are issued, ensuring they are carried out during construction. By requiring proper analysis and implementation of design measures consistent with building code standards, the GEO-1 would reduce the risk of ground failure during an earthquake and minimize the potential for injury, loss of life, or property damage and impacts would be less than significant with mitigation incorporated.

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

Impact GEO-3 THE PROJECT AREA IS NOT LOCATED IN AN AREA WITH LANDSLIDE POTENTIAL. THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS RELATED TO LANDSLIDES, AND NO IMPACT WOULD OCCUR.

Overall Project (Office and Residential Sites)

As discussed in Section 4.6.1, *Setting,* the project site is not located within a landslide hazard zone. The project site is relatively flat, and the area surrounding the project site is also relatively flat. The proposed project does not include the construction of steep slopes or hills. The office site and residential site (which includes 20,000 square feet of retail/commercial space) would not cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

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

Impact GEO-4 THE PROPOSED PROJECT WOULD NOT RESULT IN SUBSTANTIAL SOIL EROSION OR LOSS OF TOPSOIL. CONSTRUCTION OF THE PROPOSED PROJECT WOULD INCLUDE GROUND DISTURBANCE SUCH AS EXCAVATION AND GRADING THAT WOULD RESULT IN LOOSE OR EXPOSED SOIL. THIS DISTURBED SOIL COULD BE ERODED BY WIND OR DURING A STORM EVENT, WHICH WOULD RESULT IN THE LOSS OF TOPSOIL. ADHERENCE TO EXISTING PERMIT REQUIREMENTS AND COUNTY REGULATIONS WOULD ENSURE THIS IMPACT IS LESS THAN SIGNIFICANT.

Office Site

Construction of the office site would begin with demolition of existing structures and parking lots, which would expose underlying soils to wind and precipitation. Grading and excavation would follow, creating soil stockpiles and further loosening soils, increasing erosion potential.

Because the office site exceeds one acre, construction activities are subject to the NPDES Construction General Permit. The permit requires preparation of a SWPPP that includes BMPs to control erosion and sedimentation. BMPs include watering exposed soils, installing silt fencing, and implementing inspection and maintenance procedures for stormwater controls.

The project must also comply with Sonoma County Municipal Code section 11.14.080, which requires storing and protecting topsoil during grading and restoring it before revegetation. The code also mandates stabilization measures such as mulching, seeding, or planting groundcover to minimize soil loss.

After construction, landscaping with grass, shrubs, and trees would stabilize soils and reduce erosion. Project design must also implement low impact development (LID) measures under the County's MS4 Permit and the City's LID Technical Manual, including minimizing impervious surfaces, protecting slopes, and capturing runoff from a 1-inch, 24-hour storm event. Site design measures include limits on clearing, grading, and soil compaction; minimizing impervious surfaces; conserving the natural areas of the site as much as possible; and protecting slopes and channels from erosion. Implementation of low impact development measures into project design would ensure the potential for erosion during operation of the proposed project is minimized. Furthermore, project design would adhere to the hydromodification provisions of the North Coast MS4 Permit and the City's LID Technical Manual which require that projects capture 100 percent of the volume of runoff generated by a 1-inch, 24-hour storm event. Accordingly, the project design would ensure erosion from stormwater runoff would be minimized in accordance with the hydromodification provisions of the North Coast MS4 Permit and the City's Technical Manual.

With mandatory compliance with the SWPPP, County Code, MS4 Permit, and LID Technical Manual, the office site would not result in substantial soil erosion or loss of topsoil. Impacts would be less than significant.

Residential Site

Construction of the residential site would involve similar activities as the office site that would potentially expose soils and increase erosion potential. Like the office site, the residential site exceeds one acre and must comply with the NPDES Construction General Permit. A SWPPP with BMPs such as erosion control, sediment containment, and soil stabilization would be required.

The residential site (which includes 20,000 square feet of retail/commercial space) must also comply with Sonoma County Municipal Code section 11.14.080, which requires storing and restoring topsoil and implementing stabilization measures such as mulching and planting. Landscaping after construction would further stabilize soils and reduce erosion risk.

Project design would incorporate LID measures under the North Coast MS4 Permit and the City's LID Technical Manual as well, including the same site designs as the office site. These measures would reduce erosion during operation.

With compliance with all applicable regulations and BMPs, the residential site would not result in substantial soil erosion or loss of topsoil. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact GEO-5 CONSTRUCTION AND OCCUPANCY OF DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD BE LOCATED ON GEOLOGIC UNITS AND SOILS THAT ARE UNSTABLE, RESULTING IN LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION.

Overall Project (Office and Residential Sites)

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

Landslide

The project site and adjacent properties are relatively flat and not susceptible to landslide. The project does not involve creating steep slopes or hills that would be subject to landslide. The project would not increase the potential for landslides.

Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure that occurs on gentle slopes or flat areas, when poorly-drained soils lose pressure during ground shaking and fall apart. The project area is volcanic flow deposits known as the Sonoma Volcanics, sedimentary rocks known as the Petaluma Formation, and alluvial deposits, and could be subject to lateral spreading. The lateral spreading would not create off-site risks. However, on-site structures (at both the office site and residential site) would be at risk of lateral spreading.

Subsidence and Collapse

Subsidence and collapse are the downward vertical movement or shrinking of the ground surface, which can be caused by natural activity (e.g., ground shaking or sinkholes) or human activity (e.g., drilling or groundwater dewatering). Construction of the project could require dewatering depending on the depth of the underlying aquifers. Construction dewatering would have the potential to result in subsidence.

Liquefaction

The project site would be subject to lateral spreading. As discussed above in Impact GEO-2, liquefaction would be a risk to structures on the project site, as well as occupants of those structures.

The potential adverse effects of unstable geological units and soils can be avoided through proper subsoil preparation, drainage, and structural foundation design. Pursuant to the California Building Code section 1803.5.11, a geotechnical investigation or investigations would be required for the project. The geotechnical investigation would identify the potential geological and soil considerations unique to the site and provide recommendations for either treating the soils or design considerations, such as reinforced foundations or redirecting drainage away from foundations, as examples. However, if the recommendations provided in the geotechnical investigation or investigations are not incorporated into the project design, there would be risk to people and structures from unstable geologic units and unstable soils. Impacts would be potentially significant, and mitigation is required.

Mitigation Measures

Mitigation Measure GEO-1, described above under Impact GEO-1, would be required.

Significance After Mitigation

Mitigation Measure GEO-1 would require site-specific geotechnical investigations to be prepared before any grading begins which would identify soil conditions, groundwater levels, and the potential for liquefaction. This mitigation measure also requires that all recommendations be included in the project's grading and construction plans before permits are issued, ensuring they are carried out during construction. By requiring proper analysis and implementation of design measures consistent with building code standards, the GEO-1 would reduce the risk of lateral spreading, subsidence, liquefaction, or collapse and minimize the potential for injury, loss of life, or property damage and impacts would be less than significant with mitigation incorporated.

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

Impact GEO-6 DEVELOPMENT FACILITATED BY THE PROJECT HAS THE POTENTIAL TO BE LOCATED ON EXPANSIVE SOILS, WHICH WOULD CREATE SUBSTANTIAL RISKS OF LIFE OR PROPERTY SHOULD STRUCTURAL DAMAGE RESULT FROM SHRINK-SWELL CLAYS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION.

Overall Project (Office and Residential Sites)

As discussed in Section 4.6.1, *Setting*, the project is located in an area with clay soils, and clay soils are most prone to expansion. Therefore, the project could occur on expansive soils, as defined by

Table 1-B of the Uniform Building Code (1994) and thus could be subject to damage or instability if the underlying soil shrinks or swells. If the buildings on the office site or residential site experience foundation damage from shrinking and swelling of the underlying soils, the structural soundness could be comprised, such as during a seismic event. Therefore, expansive soils would present a substantial risk to life and property.

The potential adverse effects of expansive soils can be avoided through proper subsoil preparation, drainage, and foundation design. Pursuant to the California Building Code section 1803.5.11, a geotechnical investigation or investigations would be required for the project. The geotechnical investigation would identify if expansive soils are present and provide recommendations for either treating the soils or design considerations, such as reinforced foundations or redirecting drainage away from foundations, as examples. However, if the recommendations provided in the geotechnical investigation or investigations are not incorporated into the project design, there would be risk to people and structures from expansive soils. Impacts would be potentially significant, and mitigation is required.

Mitigation Measures

Mitigation Measure GEO-1, described above under Impact GEO-1, would be required.

Significance After Mitigation

Mitigation Measure GEO-1 would require site-specific geotechnical investigations to be prepared before any grading begins which would identify soil conditions. This mitigation measure also requires that all recommendations be included in the project's grading and construction plans before permits are issued, ensuring they are carried out during construction. By requiring proper analysis and implementation of design measures consistent with building code standards, the GEO-1 would minimize the potential for injury, loss of life, or property damage as a result of expansive soils and impacts would be less than significant with mitigation incorporated.

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

Impact GEO-7 THE PROJECT WOULD NOT INVOLVE SEPTIC TANKS OR ALTERATIVE WASTEWATER DISPOSAL SYSTEMS. THERE WOULD BE NO IMPACT.

Overall Project (Office and Residential Sites)

The project site is already connected to the sanitary system operated by the City of Santa Rosa. The office site and residential site would provide new later connections to the existing sanitary system. The use of septic tanks or alternative wastewater disposal systems is not proposed. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

There would be no impact.

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

Impact GEO-8 THE POTENTIAL FOR UNIQUE PALEONTOLOGICAL RESOURCES AT THE PROJECT SITE IS LOW. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

The proposed project would involve excavation and grading. Because excavation and grading disturb soils and rocks, these construction activities have the potential to damage or destroy fossils where paleontological resources are present. As described above in Section 4.6.1, *Setting*, the geologic unit underlying the project site is entirely recent (i.e., Holocene), quaternary-aged alluvium. Recent quaternary-aged alluvium is considered to have low potential to yield fossils. Additionally, excavation has already occurred across much of the project site during construction of the existing County Administration Center. Given the recent age of the mapped geologic units and prior disturbance to much of the project site, impacts to paleontological resources would be less than significant.

Mitigation Measures

Mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.6.4 Cumulative Impacts

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

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

Soil conditions associated with the proposed project, such as liquefaction and expansive soils, are specific to individual sites and generally do not contribute to a cumulative effect. Some or all other cumulative projects may have similar conditions, but they similarly would not substantially contribute to cumulative effects. Future development in the City of Santa Rosa would be subject to applicable policies in the city's General Plan, Santa Rosa Municipal Code requirements, and

California Building Code requirements related to reducing seismic and soil-related hazards such as ground shaking, liquefaction, landslides, erosion, lateral spreading, or collapse. Other current and future development or redevelopment projects in the region would similarly be required to adhere to standards and practices that include stringent geologic and soil-related hazard mitigations. Therefore, the cumulative impacts would be less than significant.

The geologic unit underlying the project site and areas within 0.25 mile of the project site is recent (i.e., Holocene), quaternary-aged alluvium (California Department of Conservation, 1963). Recent quaternary-aged alluvium is considered to have low potential to yield fossils (Bureau of Land Management, 2018). Therefore, the cumulative impacts to paleontological resources would be less than significant.

4.7 Greenhouse Gas Emissions

This section evaluates the potential impacts of greenhouse gas (GHG) emissions associated with the proposed project. Construction and operational GHG emissions associated with the proposed project are calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1, (Appendix E). The proposed project's consistency with applicable GHG reduction plans is also analyzed. The information in this section is based in part on applicable regional and local plans relevant to GHG emissions, such as the Bay Area Air District's (Air District) GHG CEQA Guidelines, the County of Sonoma's Climate Resilience Comprehensive Action Plan (Climate Plan), and the State's 2022 Scoping Plan.

4.7.1 Setting

Climate Change and Greenhouse Gases

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The IPCC expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatonnes of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global

surface temperature by approximately 1.07 degrees Celsius (°C) between the years 2010 through 2019 (IPCC 2021).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 33 degrees °C cooler (World Meteorological Organization 2024). However, since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by 47 percent, 156 percent, and 23 percent, respectively, primarily due to human activity (IPCC 2021). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

Greenhouse Gas Emissions Inventory

Global Emissions Inventory

In 2015, worldwide anthropogenic GHG emissions totaled 47,000 million metric tons (MMT) of CO_2e, which is a 43 percent increase from 1990 GHG levels. Specifically, 34,522 MMT of CO_2e, 8,241 MMT of CO_2e of CH_4, 2,997 MMT of CO_2e of N_2O, and 1,001 MMT of CO_2e of fluorinated gases were emitted in 2015. The largest source of GHG emissions were energy production and use (includes fuels used by vehicles and buildings), which accounted for 75 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and six percent, respectively. Waste sources contributed three percent, international transport contributed two percent, and land-use changes and forestry contributed to two percent of the total global GHG emissions (United States Environmental Protection Agency [USEPA] 2025a).

United States Emissions Inventory

United States GHG emissions were 6,341.2 MMT of CO_2e in 2022 or 5,487 MMT CO_2e after accounting for sequestration. Emissions decreased by 3.1 percent from 2021 to 2022. Between 2021 and 2022, the increase in total GHG emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion across most end-use sectors due in part to increased energy use from the continued rebound of economic activity after the height of the COVID-19 pandemic. In 2022, the energy sector (including transportation and industrial) accounted for 76.4 percent of nationwide GHG emissions while agriculture, commercial, and residential sections accounted for approximately 23.6 percent of nationwide GHG emissions (USEPA 2024a).

California Emissions Inventory

Based on California Air Resource Board's (CARB) California Greenhouse Gas Inventory for 2000-2022, California produced 371.1 MMT of CO_2e in 2022, which is 9.3 MMT of CO_2e lower than 2021 levels. The major source of GHG emissions in California is the transportation sector, which comprises 37.7 percent of the state's total GHG emissions. The industrial sector is the second largest source, comprising 19.6 percent of the state's GHG emissions while electric power accounts for approximately 16.1 percent (California Air Resources Board [CARB] 2024). The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO_2e. The annual 2030 statewide target emissions level is 260 MMT of CO_2e (CARB 2017).

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. The year 2024 was the warmest year since global records began in 1850 at 1.29°C (2.32°F) above the 20th century average of 13.9°C (57.0°F). This value is 0.10°C (0.18°F) more than the previous record set last year. The 10 warmest years in the 175-year record have all occurred during the last decade (2015–2024) (National Oceanic and Atmospheric Administration 2025). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations jointly indicate that Land Surface Air Temperature and sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014, 2018).

Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years. *California's Fourth Climate Change Assessment* (California Natural Resource Agency 2019) includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the State and regionally specific climate change case studies. However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. A summary follows that includes some of the potential effects that climate change could generate in California.

Air Quality and Wildfires

Scientists project that annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C in the next 50 years and by 3.1 to 4.9°C in the next century. Higher temperatures are conducive to air pollution formation and rising temperatures could therefore result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the State has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains (California Natural Resource Agency 2019). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. With increasing temperatures, shifting weather patterns, longer dry seasons, and more dry fuel loads, the frequency of large wildfires and area burned is expected to increase (California Natural Resources Agency 2021).

Water Supply

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

and dry precipitation extremes have become more common (California Department of Water Resources 2018). For example, the winter of 2022-2023 had severe storms and flooding from increased rainfall and snowmelt, which the California Department of Water Resources identified as "the latest example that California's climate is becoming more extreme" (California Department of Water Resources 2023). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring snowpack in the western United States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts (California Natural Resource Agency 2019). The Sierra Nevada Mountains snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack. Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (California Natural Resource Agency 2019).

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding (California Natural Resource Agency 2019). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding. The rate of increase of global mean sea levels between 1993 to 2024, observed by satellites, is approximately 3.3 millimeters per year, double the twentieth century trend of 1.6 millimeters per year (World Meteorological Organization 2013; National Aeronautics and Space Administration 2024). Global mean sea levels in 2013 were about 0.23 meter higher than those of 1880 (National Oceanic and Atmospheric Administration 2023). Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea level rise ranging between 0.25 to 1.01 meters by 2100 with the sea level ranges dependent on a low, intermediate, or high GHG emissions scenario (IPCC 2021). A rise in sea levels could erode 31 to 67 percent of southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (California Natural Resource Agency 2019). Furthermore, increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

In 2023, the market value of agricultural products sold in California totaled $59.4 billion, up a 1.4 percent increase in cash receipts compared to the previous year. California produces over a third of the country's vegetables and three-quarters of the country's fruits and nuts (California Department of Food and Agriculture 2024). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (California Natural Resource Agency 2019). Temperature

increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems

Climate change and the potential resultant changes in weather patterns could have ecological effects on the global and local scales. Soil moisture is likely to decline in many regions due to higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage (Parmesan 2006; California Natural Resource Agency 2019).

4.7.2 Regulatory Setting

a. Federal Regulations

The United States Supreme Court determined in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 497) that the USEPA has the authority to regulate motor vehicle GHG emissions under the federal Clean Air Act (CAA). The USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions.

In *Utility Air Regulatory Group v. Environmental Protection Agency* ([2014] 573 U.S. 302), the United States Supreme Court held the USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source can be considered a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The Court also held that Prevention of Significant Deterioration permits otherwise required based on emissions of other pollutants may continue to require limitations on GHG emissions based on the application of Best Available Control Technology.

b. State Regulations

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

California Advanced Clean Cars Program

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." Pavley I regulates model years from 2009 to 2016 and Pavley II, now referred to as "LEV (Low Emission Vehicle) III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles, and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, the rules will be fully implemented, and new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011). In October 2023, CARB launched a new effort to consider potential amendments to the Advanced Clean Cars II regulations, including updates to the tailpipe greenhouse gas emission standard and limited revisions to the LEV and Zero-emission Vehicle regulations. The Advanced

Clean Cars II regulations will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. By 2035 all new passenger cars, trucks and SUVs sold in California will be zero emissions. The Advanced Clean Cars II regulations take the state's already growing zero-emission vehicle market and robust motor vehicle emission control rules and augments them to meet more aggressive tailpipe emissions standards and ramp up to 100 percent zero-emission vehicles (CARB 2025).

On June 12, 2025, House Joint Resolution 88 was signed into law nullifying the USEPA's notice which granted CARB's request for the regulation. Therefore, enforcement of the Advanced Clean Cars II regulation remains uncertain at this time. The future of implementation remains unclear as California pursues legal action against the resolution (H.J. Ress.88, 2025).

Executive Order S-3-05

In 2005, the governor issued Executive Order (EO) S-3-05, which identifies statewide GHG emission reduction targets to achieve long-term climate stabilization as follows:

- Reduce GHG emissions to 1990 levels by 2020.
- Reduce GHG emissions to 80 percent below 1990 levels by 2050.

In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report"). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, etc.

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

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO_2e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2008). Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan's approval.

CARB approved the 2013 Scoping Plan update in May 2014. The plan update defined CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the State's longer term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100 (discussed later). The 2017 Scoping Plan also puts increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of six MT of CO_2e by 2030 and two MT of CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the State (CARB 2017).

Assembly Bill 1279

AB 1279, "The California Climate Crisis Act," was passed on September 16, 2022, and declares the State will achieve net zero GHG emissions as soon as possible, but no later than 2045, and will achieve and maintain net negative GHG emissions thereafter. In addition, the bill states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045.

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

The 2022 update assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan; addresses recent legislation and direction from Governor Newsom; extends and expands upon these earlier plans; implements a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045; and takes an additional step of adding carbon neutrality as a science-based guide for California's climate work. As stated in the 2022 update, "The plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the state's NWL and using a variety of mechanical approaches" (CARB 2022). Specifically, the 2022 update includes the following:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs

- Integrates equity and protection for California's most impacted communities as driving principles throughout the document
- Incorporates the contribution of NWL to the State's GHG emissions, as well as their role in achieving carbon neutrality
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture
- Evaluates the substantial health and economic benefits of taking action
- Identifies key implementation actions to ensure success

In addition to reducing emissions from transportation, energy, and industrial sectors, the 2022 update includes emissions and carbon sequestration in NWL and explores how NWL contributes to long-term climate goals. Under the Scoping Plan Scenario, California's 2030 emissions are anticipated to be 48 percent below 1990 levels, representing an acceleration of the current SB 32 target. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the accelerated 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet our GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology.

Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed into law by the Governor Schwarzenegger in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations (MPOs) are required to adopt a Sustainable Communities Strategy (SCS), which allocates land uses in the MPO's Regional Transportation Plan (RTP). Qualified projects consistent with an approved SCS or Alternative Planning Strategy (categorized as "transit priority projects") can receive incentives to streamline CEQA processing.

On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. SCAG was assigned targets of an 8 percent reduction in per capita GHG emissions from passenger vehicles by 2020[1] and a 19 percent reduction in per capita GHG emissions from passenger vehicles by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

Senate Bill 1383

Adopted in September 2016, SB 1383 (Lara, Chapter 395, Statutes of 2016) requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. SB 1383 requires the strategy to achieve the following reduction targets by 2030:

[1] SCAG met the 2020 GHG emissions reduction target, as described in the 2024-2050 RTP/SCS.

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

SB 1383 also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Senate Bill 100

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. The project's main electricity provider is Pacific Gas & Electric Company (PG&E), which provides 38 percent of electricity generation from renewable sources including biopower, geothermal, small hydroelectric, solar and wind power. Customers can also opt up to the Solar Choice Program, allowing them to purchase either 50 or 100 percent of their electricity from solar energy without the need to install solar panels on their property (PG&E 2025).

Executive Order B-55-18

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

California Building Standards Codes

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2025 Title 24 standards. The California Building Standards Code's energy-efficiency and green building standards are outlined below. These standards are updated every three years; however, AB 130 places a six year pause on new state and local residential building code updates, effective January 1, 2026. Because the project's building permit would be issued after January 1, the proposed project is subject to the 2022 California Building Standards.

Part 6 – Building Energy Efficiency Standards/Energy Code

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The 2022 Title 24 standards are the applicable building energy efficiency standards for the proposed project because they became effective on January 1, 2023.

Part 11 – California Green Building Standards

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective on January 1, 2011 (as part of the 2010 California Building Standards Code). The 2022 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

The mandatory standards applicable to air quality require:

- Electric Vehicle (EV) Charging for New Construction:[2]
  - One- and two-family dwellings and town houses with attached private garages. Dedicated circuitry to facilitate installation of electric vehicle (EV) charging.
  - Multi-family dwellings and hotels/motels with less than 20 units/rooms: Designation of at least 10 percent of the total number of parking spaces shall be EV capable and at least 25 percent of the total number of parking spaces shall be EV-ready.
  - Multi-family dwellings and hotels/motels with greater than 20 units/rooms: Designation of at least 10 percent of the total number of parking spaces shall be EV capable, at least 25 percent of the total number of parking spaces shall be EV-ready, and at least 5 percent of the total number of parking spaces shall be equipped with a Level 2 charging station.
  - Non-residential land uses shall comply with the following EV charging requirements based on the number of passenger vehicle parking spaces:
    - 0-9: no EV capable spaces or charging stations required;
    - 10-25: 4 EV capable spaces but no charging stations required;
    - 26-50: 8 EV capable spaces of which 2 must be equipped with charging stations;
    - 51-75: 13 EV capable spaces of which 3 must be equipped with charging stations;
    - 76-100: 17 EV capable spaces of which 4 must be equipped with charging stations;
    - 101-150: 25 EV capable spaces of which 6 must be equipped with charging stations;
    - 151-200: 35 EV capable spaces of which 9 must be equipped with charging stations; and
    - More than 200: 20 percent of the total available parking spaces of which 25 percent must be equipped with charging stations.

Non-residential land uses shall comply with the following EV charging requirements for medium- and heavy-duty vehicles: warehouses, grocery stores, retail stores, office buildings, and manufacturing facilities with planned off-street loading spaces shall install EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s), or subpanel(s) at the time of construction based on the number of off-street loading spaces as indicated in Table 5.106.5.5.1 of the California Green Building Standards;

[2] EV Capable = a vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways to support EV charging; EV-ready = a vehicle space which is provided with a branch circuit and any necessary raceways to accommodate EV charging stations, including a receptacle for future installation of a charger (see 2025 California Green Building Standard Code, Title 24 Part 11 for full explanation of mandatory measures, including exceptions).

- Bicycle Parking:
  - Non-residential short-term bicycle parking for projects anticipated to generate visitor traffic: permanently anchored bicycle racks within 200 feet of visitor entrance for 5 percent of new visitor motorized vehicle parking spaces with a minimum of one 2-bike capacity rack; and/or
  - Non-residential buildings with tenant spaces of 10 or more employees/tenant-occupants: secure bicycle parking for 5 percent of the employee/tenant-occupant vehicle parking spaces with a minimum of one bicycle parking facility.
- Shade Trees (Non-Residential):
  - Surface parking: minimum No. 10 container size or equal shall be installed to provide shade over 50 percent of the parking within 15 years (unless parking area covered by appropriate shade structures and/or solar);
  - Landscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years; and/or
  - Hardscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years (unless covered by applicable shade structures and/or solar or the marked area is for organized sports activities).

The voluntary standards applicable to air quality require:

- Residential – Cool Roofs: have a thermal mass over the roof membrane, including green roofs weighing a minimum of 25 pounds per square foot or roof areas covered by solar photovoltaic panels and building integrated solar thermal panels;
- Residential – Reduce nonroof heat island for 50 percent of sidewalks, patios, driveways or other paved areas;
- One- and two-family dwelling units and townhouses with attached garages: install a dedicated 208/250-volt branch circuit for EV charging;

Residential Bicycle Parking:

- Multi-family/hotel/motel short-term parking: provide permanently anchored bicycle racks within 100 feet of visitor's entrance for 5 percent of visitor motorized vehicle parking capacity (minimum one 2-bike capacity rack);
- Multi-family buildings long-term parking: provide acceptable on-site bicycle parking for at least one bicycle per every two dwelling units; and/or
- Hotel/motel long-term parking: provide one acceptable on-site bicycle parking space for every 25,000 square feet but not less than two spaces;

Tier I:

- Stricter energy efficiency requirements;
- Stricter water conservation requirements for specific fixtures;
- minimum 65 percent reduction in construction waste with third-party verification, Minimum 10 percent recycled content for building materials;
- Minimum 20 percent permeable paving;
- Minimum 20 percent cement reduction;

- Multi-family developments/hotels/motels: minimum 35 percent of total parking spaces shall be EV ready and for projects with 20 or more dwelling units/rooms a minimum of 10 percent of the total number of parking spaces shall be equipped with EV charging stations.

Tier II:

- Stricter energy efficiency requirements,
- Stricter water conservation requirements for specific fixtures;
- Minimum 75 percent reduction in construction waste with third-party verification,
- Minimum 15 percent recycled content for building materials;
- Minimum 30 percent permeable paving;
- Minimum 25 percent cement reduction; and/or
- Multi-family developments/hotels/motels: minimum 40 percent of total parking spaces shall be EV ready and for projects with 20 or more dwelling units/rooms, a minimum of 15 percent of the total number of parking spaces shall be equipped with EV charging stations..

California Integrated Waste Management Act (Assembly Bill 341)

The California Integrated Waste Management Act of 1989, as modified by AB 341 in 2011, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities and (2) diversion of 50 percent of all solid waste on and after January 1, 2000.

Executive Order N-79-20

On September 23, 2020, Governor Newsom issued EO N-79-20, which established the following new statewide goals:

- All new passenger cars and trucks sold in-state to be zero-emission by 2035
- All medium- and heavy-duty vehicles in the state to be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks
- All off-road vehicles and equipment to be zero-emission by 2035 where feasible.

EO N-79-20 directs CARB, the Governor's Office of Business and Economic Development, the California Energy Commission, the California Department of Transportation, and other State agencies to take steps toward drafting regulations and strategies and leveraging agency resources toward achieving these goals.

Clean Energy, Jobs, and Affordability Act of 2022 (Senate Bill 1020)

Adopted on September 16, 2022, SB 1020 creates clean electricity targets for eligible renewable energy resources and zero-carbon resources to supply 90 percent of retail sale electricity by 2035, 95 percent by 2040, 100 percent by 2045, and 100 percent of electricity procured to serve all State agencies by 2035. This bill shall not increase carbon emissions elsewhere in the western grid and shall not allow resource shuffling.

c. Local Regulations

Bay Area Air District

The project is located in the San Francisco Bay Area Air Attainment Basin (SFBAAB), which is under the jurisdiction of the Air District. The Air District is responsible for enforcing standards and regulating stationary sources in their jurisdiction. The Air District regulates GHG emissions through specific rules and regulations as well as project and plan level emissions thresholds for GHGs to ensure that the Bay Area contributes to its fair share of emissions reductions. In April 2022, the Air District adopted updated CEQA Thresholds and Guidelines for evaluating the climate impacts of land use projects and plans. Projects would be required to contribute its "fair share" of what would be required to achieve the State's long-term climate goals of carbon neutrality by 2045 (BAAQMD 2023).

Sonoma County Regional Climate Protection Authority

In 2016, the Sonoma County Regional Climate Protection Authority (RCPA) published its Climate Action 2020 and Beyond, which established a framework for countywide GHG reduction efforts. On May 8, 2018, the County adopted a resolution committing to work toward the RCPA's countywide targets of reducing GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. Since then, in March 2021, the RCPA adopted the Sonoma Climate Mobilization Strategy, which expanded upon Climate Action 2020 and Beyond by setting a goal of carbon neutrality by 2030, a more ambitious goal than the California 2020 goal of 40 percent below 1990 levels by 2030. The Sonoma Climate Mobilization Strategy contains a ten-year policy package that outlines 13 countywide strategies under local authority that have the potential to significantly reduce GHG emissions and increase carbon sequestration by 2030. The following strategies applicable to the project to reduce GHG impacts include (RCPA 2021):

Decarbonization

Strategy 1: All-Electric Building Campaign

Objective 1.1: Develop a date-certain, funded, and phased retrofit requirement for existing buildings to transition to all-electric and improve their overall energy efficiency:

- Adopt a requirement to retrofit all municipal buildings to enhance energy efficiency and convert to all-electric by 2030.

Objective 1.2: Require new buildings to be all-electric.

Strategy 2: Carbon-Free Electricity

Objective 2.2: Achieve 100 percent carbon-free electricity in municipal buildings by 2030 through a combination of Sonoma Clean Power Evergreen, City of Healdsburg Green Rate, and onsite solar plus battery storage.

Strategy 4: EV Access for All Partnership

Objective 4.1: Work with regional partners and local businesses to develop over 10,000 public and workplace charging stations in Sonoma County by 2027, emphasizing the installation of charging stations in rental properties in frontline communities.

Resilience and Adaptation

Strategy 10: Energy Grid for the Future

> **Objective 10.1:** Develop both community and municipal microgrids, focusing on supporting critical infrastructure and vulnerable populations first.

County of Sonoma Climate Resilience Comprehensive Action Plan

The County of Sonoma Climate Resilience Comprehensive Action Plan (Climate Plan) was approved in August 2024, which outlines the County intended path to reduce greenhouse gas emissions from the County's operations and increase resilience to climate hazards that threaten Sonoma County. This plan aims to enable the County to achieve carbon neutrality by the year 2030. However, the Climate Plan is not a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b). Therefore, the following strategies and measures applicable to the project are provided for informational purposes (County of Sonoma 2024).

Energy

E-CO-5: Minimize energy use and maximize resilience in new County Facilities by developing energy policies.

E-CO-6: Minimize energy use and maximize resilience in the new County Government Center by following approved building energy design policies (E-CO-5), or by achieving LEED certification.

E-CO-8: Reduce energy use and increase resilience in the mid-term by completing public lighting upgrades to high-efficiency systems.

E-CO-9: Promote electric vehicle readiness.

Transportation

T-CO-1: Decarbonize the County fleet of light duty vehicles by 2040.

T-CO-5: Deploy zero emission vehicle infrastructure in number and locations to support the decarbonization schedule for light and heavy-duty fleets.

Water

W-CO-5: Evaluate, prioritize, and implement water saving features into current and new construction of County facilities.

4.7.3 Impact Analysis

A project-level analysis is appropriate for the office site, as the specific planning, construction, and operational details can be evaluated. The project-level analysis evaluates the office site, which includes the County office building, Emergency Coordination Center, and associated parking areas, with construction anticipated to begin as early as 2027. A programmatic EIR is suitable for the residential site because it is not yet a designed development project. Development of the residential site would occur in phases based on future applications and is expected to construct 1,500 units by 2029 and 20,000 square feet of retail/commercial space. The residential site represents a conceptual program for future housing and is analyzed on a programmatic level.

a. Significance Threshold

To determine whether a project would result in a significant impact related to GHG emissions, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Office Site

The majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA guidelines*, Section 15064[h][1]).

According to the state CEQA guidelines, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the proposed project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (2016) in its white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions.

The County of Sonoma does not have an established significance threshold for evaluating GHG emissions. Neither the Air District, California Office of Planning and Research, CARB, CAPCOA, nor any other state or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the proposed project. The Air District has adopted qualitative CEQA thresholds for GHG emissions in their 2022 *California Environmental Quality Act Air Quality Guidelines* manual. Based on the Air District's thresholds, land use projects analyzed at the project level must include either A or B below to be determined to have less than significant impacts with respect to GHG emissions (Air District 2023).

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
ii. Office projects: 15 percent below the existing VMT per employee
iii. Retail projects: no net increase in existing VMT

b. The project will achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

In accordance with CEQA Guidelines Section 15064[h] and part A of the Air District guidance, consistency with the building and transportation design elements is used to determine the significance of the office site of the proposed project. In addition, the office site is evaluated for consistency with the County of Sonoma Climate Plan and Sonoma Climate Mobilization Strategy's GHG reduction measures applicable to municipal operations on County-owned land.

Residential Site

The project would include up to approximately 1,500 residential units over 14.6 acres, along with 20,000 square feet of retail/commercial space, and is analyzed on a programmatic level. At the plan level, the 2022 Air District *CEQA Guidelines Thresholds of Significance* contains two approaches for determining significance of GHGs for plan-level projects:

1. Evaluation of whether a plan or project meets State goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or
2. Evaluation of consistency with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

If a plan is not consistent with one of these approaches, it could be considered to have an incremental significant impact on GHG emissions. In 2018, the County agreed to work towards reducing GHG emissions by 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050 (County of Sonoma 2018). In 2021, the County further advanced these commitments by adopting the Sonoma Climate Mobilization Strategy, which sets a goal of countywide carbon neutrality by 2030, exceeding the State's 2045 carbon neutrality target (County of Sonoma 2021). Therefore, the County of Sonoma applies the first approach to evaluate the significance of GHG emissions associated with the residential site. In addition, operational GHG emissions from the proposed project are provided for informational purposes.

b. Methodology

Calculations of CO_2, CH_4, and N_2O emissions are provided to identify the magnitude of potential effects of the proposed project related to GHG emissions. The analysis focuses on CO_2, CH_4, and N_2O because these comprise 98 percent of all GHG emissions by volume and are the GHG emissions the proposed project would emit in the largest quantities (IPCC 2014). Emissions of all GHGs are converted into their equivalent GWP in terms of CO_2 (i.e., CO_2e). Minimal amounts of other GHGs (such as chlorofluorocarbons [CFCs]) would be emitted; however, these other GHG emissions would not substantially add to the total. GHG emissions associated with proposed project construction and operational activity were calculated using the CalEEMod version 2022.1 (see Appendix E for calculations).

Construction

During construction, the proposed project would generate GHG emissions primarily from the use of internal combustion engines to power on-site equipment as well as off-site transportation of workers and materials. Further detail for the input assumptions included in the modeling of GHG emissions are provided in Section 4.2, *Air Quality* and Appendix E for the CalEEMod worksheets. Because construction emissions occur for a limited period of a project's lifetime, as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime. In accordance with Association of Environmental Professional (AEP)'s recommendation, GHG emissions from construction of the proposed project were amortized over a 30-year period and added to annual operational emissions to determine the project's total annual GHG emissions (AEP 2016).

Operation

Operation of the office site of the project would begin in 2029. Details for mobile source and area source inputs included in the modeling of GHG emissions are provided in Section 4.2, *Air Quality.* Additional sources detailed in Section 4.2, *Air Quality,* that contribute to the release of GHG emissions include the following:

Energy Sources

Energy source emissions are based on CalEEMod default assumptions for the proposed land use types in each buildout scenario. Emissions from energy use include electricity and natural gas use. The proposed project would generate GHG emissions from electricity use associated with household appliances and lighting for the proposed residential units and office buildings. The proposed project would be served by PG&E. Specific energy intensity factors (i.e., the amount of CO_2e per megawatt-hour) from PG&E are used in the calculation of GHG emissions. The project would construct a one megawatt solar micro-grid over covered parking area. Therefore, the CalEEMod model includes onsite solar, which is reflected in the CalEEMod "mitigated" outputs. However, this represents the project's design feature and is not a mitigation strategy.

The default electricity consumption values in CalEEMod include the CEC-sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies. The 2022.1 CalEEMod currently incorporates California's 2019 Title 24 building energy efficiency standards. CalEEMod assumption values for residential and parking lot fixtures were used in the analysis.

Waste Sources

GHG emissions from waste generation were also calculated in CalEEMod and are based on CARB's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CARB 2010). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by the CalRecycle.

Water and Wastewater Sources

The analysis used CalEEMod default water and wastewater consumption rates to determine GHG emissions from water and wastewater sources. CalEEMod calculated GHG emissions from water and wastewater usage based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California and the average values for northern and southern California.

c. Project Impacts

Threshold 1:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1 THE PROPOSED PROJECT WOULD GENERATE TEMPORARY AND LONG-TERM INCREASES IN GHG EMISSIONS, BUT THE PROPOSED PROJECT WOULD BE CONSISTENT WITH THE AIR DISTRICT'S 2022 CEQA GREENHOUSE GAS GUIDELINES AND THE SONOMA CLIMATE MOBILIZATION STRATEGY WITH THE IMPLEMENTATION OF MITIGATION MEASURE GHG-1. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Office Site

The Air District's 2022 CEQA Guidelines recommend using the approach endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204), which evaluates a project based on its effect on California's efforts to meet the State's long-term climate goals. If a project contributes its 'fair share' of what is required to achieve those long-term climate goals, a reviewing agency can determine that the impact will not be significant, as the project will help address global climate change. The Air District recommends that land use projects contribute their 'fair share' by reducing GHG emissions through measures such as energy-efficient building designs, the use of renewable energy sources, and sustainable transportation options. The analysis evaluates its 'fair share' through part A of the Air District guidance.

The project would be consistent with the Air District criteria for buildings since it would include an all-electric building that does not include natural gas appliances or plumbing. The project would comply with the CARB In-Use Off-Road Diesel-Fueled Fleets Regulation during construction, which imposes limits on idling and restricts the use of older vehicles; this would reduce fuel consumption and lead to the use of fuel-efficient vehicles on the construction site. Construction equipment would also be maintained to applicable standards, and construction activity and associated fuel consumption and energy use would be temporary and typical for construction sites. In addition, as detailed in Section 4.5, *Energy*, the total electricity demand during project operations would be less than 0.005 percent of PG&E's energy supply. Therefore, the project would not result in wasteful or unnecessary energy consumption during construction and operation or conflict with existing energy standards and regulations and would be consistent with the Air District building thresholds.

As discussed in the project's Traffic Impact Analysis prepared by Fehr & Peers (Attachment B), the project would result in up to 18 additional employees at the office site and would not generate a substantial increase in VMT; therefore, it was screened out for further VMT analysis. The same project design features that contribute to reducing VMT per resident below the County threshold would similarly apply to employees and are expected to reduce office-related VMT. However, the project would not incorporate Tier 2 EV infrastructure with the latest CALGreen Standards. Therefore, the project would be potentially significant and mitigation is required. ..

Residential Site

As demonstrated in the Traffic Impact Analysis for the residential site, the project would generate approximately 8.42 VMT per resident, which is about 15 percent below the applicable regional threshold. Additionally, In 2018, the County agreed to work towards RCPA's GHG emissions target of 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050 (County of Sonoma 2018). In 2019, RCPA declared a climate emergency and committed to developing a countywide

2030 Climate Emergency Mobilization Strategy that focuses on identifying key local actions, including a ten-year Emergency Policy Package prioritizing a short list of the most impactful local policies that will drive systems change and identifying the key areas for state level advocacy (County of Sonoma 2021). In 2021, the County adopted the Sonoma Climate Mobilization Strategy, which sets a goal of countywide carbon neutrality by 2030, exceeding the State's 2045 carbon neutrality target. The Climate Mobilization Strategy outlines 13 priority actions under local authority across key focus areas including energy, transportation, buildings, waste, natural and working lands, and community resilience. Table 4.7-2 summarizes the project consistency with the Sonoma Climate Mobilization Strategy. As discussed therein, the residential site would be consistent with the actions and measures contained in the Sonoma Climate Mobilization Strategy, and as a result the residential site impacts would be less than significant.

Table 4.7-1 Project Consistency with Sonoma Climate Mobilization Strategy

Strategy	Project Consistency
1. All-Electric Buildings Campaign 1.2 Require new buildings to be all-electric.	**Consistent.** The project would incorporate all-electric appliances for proposed residential and retail/commercial land uses and would not include natural gas or propane appliances. Therefore, the project would be consistent with this strategy.
4. EV Access for All Partnership 4.1 Work with regional partners and local businesses to develop over 10,000 public and workplace charging stations in Sonoma County by 2027, emphasizing the installation of charging stations in rental properties in frontline communities.	**Consistent.** The project would implement Mitigation Measure GHG-1 below, and adhere to CALGreen's Tier 2 EV charging standards for new construction of residential land uses. Therefore, the project would be consistent with this strategy.

Source: County of Sonoma 2021

Mitigation Measures

GHG-1 Greenhouse Gas Emissions Reductions

The County shall verify prior to issuing a building permit that the project shall incorporate the following GHG emissions reduction action to demonstrate consistency with the Air District's GHG CEQA thresholds and the Sonoma Climate Mobilization Strategy:

- Provide EV charging infrastructure that, at minimum, meets California Green Building Standards Code Tier 2 voluntary measures at the time of project approval.

Significance After Mitigation

Mitigation Measure GHG-1 would require the project to incorporate EV charging infrastructure consistent with the Air District's transportation project design element and comply with the latest Tier 2 CALGreen Standards. In addition, it would be consistent with Sonoma County's Sonoma Climate Mobilization Strategy 4, EV Access for All Partnership, to accelerate the transition to 100 percent EV for transportation. Therefore, project GHG impacts would be less than significant with mitigation.

Threshold 2:	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH THE COUNTY OF SONOMA CLIMATE PLAN AND THE SONOMA CLIMATE MOBILIZATION STRATEGY WITH IMPLEMENTATION OF MITIGATION MEASURE GHG-1. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Office Site

COUNTY OF SONOMA CLIMATE PLAN

In August 2024, the County of Sonoma approved its Climate Plan, establishing a coordinated framework to reduce GHG emissions from the County's municipal operations and strengthen resilience to climate hazards. The Climate Plan identifies 54 measures across sectors such as energy, transportation, waste, water, wildfire, and natural and working lands, guiding Sonoma County toward carbon neutrality by 2030, ahead of the State's carbon neutrality goal ahead of the 2045 target. The Climate Plan is applicable to the office site because it involves internal municipal operations and is on County-owned land. Table 4.7-2 summarizes the consistency of the office site with the Climate Plan. As discussed therein, the project would be consistent with the actions and measures contained in the Climate Plan.

Table 4.7-2 Project Consistency with County of Sonoma Climate Plan

Measures	Project Consistency
E-CO-5: Minimize energy use and maximize resilience in new County Facilities by developing energy policies. **E-CO-6:** Minimize energy use and maximize resilience in the new County Government Center by following approved building energy design policies (E-CO-5), or by achieving LEED certification.	**Consistent.** The project would construct a one-megawatt microgrid with on-site battery storage across the surface parking lot to support facility energy demand. The project would also include all-electric appliances for the office land uses..
E-CO-8: Reduce energy use and increase resilience in the mid-term by completing public lighting upgrades to high-efficiency systems.	**Consistent.** The project would be consistent with the provisions of the Title 24 Building Energy Efficiency Standards and install energy efficient appliances.
T-CO-1: Decarbonize the County fleet of light duty vehicles by 2040. **T-CO-5**: Deploy zero emission vehicle infrastructure in number and locations to support the decarbonization schedule for light and heavy-duty fleets.	**Consistent.** The project would adhere to CALGreen's Tier 2 EV charging standards for new construction of non-residential land uses, and thereby be consistent with Policy T-CO-5 goal of deploying zero emissions vehicle infrastructure. In addition, the new EV infrastructure would encourage the deployment of zero emissions vehicles, consistent with Policy T-CO-1.
W-CO-5 Evaluate, prioritize, and implement water saving features into current and new construction of County facilities.	**Consistent.** The project would comply with the latest Title 24 CALGreen Standards by installing water efficient features, including high efficiency low flow fixtures, efficient water heating systems, drought tolerant landscaping, and high efficiency irrigation. In addition, the project will comply with the County's Water Efficient Landscape Ordinance.

Source: County of Sonoma 2024

SONOMA CLIMATE MOBILIZATION STRATEGY

Table 4.7-2 summarizes the office site's consistency with the Sonoma Climate Mobilization Strategy. As discussed therein, the office site would be consistent with the actions and measures contained in the Sonoma Climate Mobilization Strategy.

Table 4.7-3 Project Consistency with Sonoma Climate Mobilization Strategy

Measures	Project Consistency
1. All-Electric Buildings Campaign 1.1 Develop a date-certain, funded, and phased retrofit requirement for existing buildings to transition to all-electric and improve their overall energy efficiency. ▪ Adopt a requirement to retrofit all municipal buildings to enhance energy efficiency and convert to all-electric by 2030. 1.2 Require new buildings to be all-electric.	**Consistent.** The project would incorporate all-electric appliances for the office land uses and would not include natural gas or propane appliances. Therefore, the project would be consistent with this strategy.
4. EV Access for All Partnership 4.1 Work with regional partners and local businesses to develop over 10,000 public and workplace charging stations in Sonoma County by 2027, emphasizing the installation of charging stations in rental properties in frontline communities.	**Consistent.** The project would implement Mitigation Measure GHG-1 and adhere to CALGreen's Tier 2 EV charging standards for new construction of non-residential land uses. Therefore, the project would be consistent with this strategy.
10. Energy Grid for the Future 10.1 Develop both community and municipal microgrids, focusing on supporting critical infrastructure and vulnerable populations first.	**Consistent.** The project would construct a one-megawatt microgrid with on-site battery storage across the surface parking lot to support facility energy demand. Therefore, the project would be consistent with this strategy.

Source: County of Sonoma 2024

Residential Site

COUNTY OF SONOMA CLIMATE PLAN

Future development on the residential site would occur on County-owned land; therefore, analyzing the residential site's consistency with the Climate Plan is appropriate. Table 4.7-4 summarizes the consistency of the residential site with the Climate Plan. As discussed therein, the project would be consistent with the actions and measures contained in the Climate Plan.

Table 4.7-4 Project Consistency with County of Sonoma Climate Plan

Measures	Project Consistency
E-CO-5: Minimize energy use and maximize resilience in new County Facilities by developing energy policies. **E-CO-6:** Minimize energy use and maximize resilience in the new County Government Center by following approved building energy design policies (E-CO-5), or by achieving LEED certification. **E-CO-9:** Support decarbonization transition by planning for maintenance needs and staff training related to operation and maintenance of new technologies.	**Consistent.** The project would also include all-electric appliances for the residential and retail/commercial land uses. In addition, residential development would achieve base LEED certification.
E-CO-8: Reduce energy use and increase resilience in the mid-term by completing public lighting upgrades to high-efficiency systems.	**Consistent.** The project would be consistent with the provisions of the Title 24 Building Energy Efficiency Standards and install energy efficient appliances.

Measures	Project Consistency
W-CO-5 Evaluate, prioritize, and implement water saving features into current and new construction of County facilities.	**Consistent.** The project would comply with the latest Title 24 CALGreen Standards by installing water-efficient features, including high-efficiency low-flow fixtures, efficient water-heating systems, drought-tolerant landscaping, and high-efficiency irrigation.

Source: County of Sonoma 2024

Implementation of Mitigation Measure GHG-1, which requires provision of Tier 2 EV charging infrastructure, is necessary to ensure consistency with applicable plans and policies related to greenhouse gas reduction.

Mitigation Measures

Refer to Mitigation Measure GHG-1.

Greenhouse Gas Emissions for Informational Purposes

Overall Project (Office and Residential Sites)

Neither the Air District nor other applicable regional agencies have a numerical threshold to determine significance of the proposed project's GHG emissions. Therefore, GHG impacts are determined above, and GHG emissions shown below are provided for informational purposes. Construction of the office site and residential site would generate temporary GHG emissions primarily from the operation of construction equipment on-site as well as from vehicles transporting construction workers to and from the project site and heavy trucks to transport building materials. As shown in Table 4.7-5, construction of the proposed project would generate an estimated total of 2,713 MT CO_2e. Amortized over a 30-year period, construction of the proposed project would generate an estimated 90 MT CO_2e per year.[3]

Table 4.7-5 Estimated Construction GHG Emissions

Year[1]	Project Emissions (MT of CO_2e)
2026	424
2027	1,218
2028	1,071
Total	**2,713**
Total Amortized over 30 Years	**90**

MT = metric tons; CO_2e = carbon dioxide equivalent

[1] Construction activities with a later start date than 2026 would generate lower emissions, due to CalEEMod emissions factors accounting for the state's initiative for cleaner equipment fleet (i.e., each subsequent year assumes lower emission factors for each construction equipment). Therefore, because construction would occur at a later date than 2026, this analysis and the CalEEMod modeling upon which it is based provide a conservative assumption.

Source: See Appendix E for CalEEMod worksheets. See Table 2.2 "Construction Emissions by Year, Unmitigated" annual emissions.

[3] Per AEP guidance, GHG emissions from construction activities are amortized over a 30-year project lifetime period (AEP 2016).

Operation of the proposed project would generate GHG emissions associated with mobile sources, area sources, energy and water usage, wastewater and solid waste generation, refrigerant, and stationary sources. Table 4.7-6 combines the estimated construction and net new operational GHG emissions associated with development of the project. As shown therein, annual emissions from the proposed project would be approximately 5,608 MT of CO_2e per year. [4]

Table 4.7-6 Combined Annual Emissions of Greenhouse Gases

Emission Source	Project Emissions (MT of CO_2e per year)
Construction	**90**
Existing Operational	**821**
Area	3
Energy	689
Water	71
Waste	58
Refrigerant	<1
Proposed Operational[1]	**1,813**
Area	77
Energy	1,010
Water	182
Waste	429
Refrigerant	2
Stationary	113
Net Mobile (proposed – existing)[2]	**4,526**
Net Total	**5,608**

MT = metric tons; CO2e = carbon dioxide equivalent

[1]The proposed operational emissions include activity from both the office site and the residential site.

[2]Net increase in mobile emissions resulting from residential site, including 1,500 new residential units and 20,000 square feet or retail/commercial space. Source: Appendix E CalEEMod worksheets. See Table 2.5 "Operational Emissions by Sector, Unmitigated" annual emissions.

4.7.4 Cumulative Impacts

GHG emissions and climate change are, by definition, cumulative impacts. Although GHG emissions have worldwide repercussions, the contribution of the project to cumulative impacts is addressed in light of the goals for reducing statewide emissions. Therefore, the geographic scope for considering cumulative impacts related to GHG emissions is the State of California.

Statewide GHG emissions are an existing significant cumulative impact. As such, the State has established the following statewide emissions reductions targets:

- By 2020, reduce GHG emissions to 1990 levels
- By 2030, reduce GHG emissions to 40 percent below 1990 levels
- By 2045, to achieve carbon neutrality

[4] Net operational emissions are higher than existing emissions due to the development of 1,500 residential units and associated retail/commercial land uses.

GHG impacts are assessed in a cumulative context since no single project can cause a discernible change to the climate. Therefore, cumulative significance is based on the same thresholds as the proposed project. In the absence of an adopted numeric threshold for the County of Sonoma, the significance of the project's GHG emissions is evaluated on the consistency with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The analysis provided GHG emissions for informational purposes.

For this project, the Air District provides thresholds for land use projects that must include either A, project design features, or B, consistency with a local GHG reduction strategy to be determined to have less than significant impacts with respect to GHG emissions. If a project is designed and built to incorporate these design elements, then it will contribute its portion of what is necessary to achieve California's long-term climate goals—its "fair share"—and an agency reviewing the project under CEQA can conclude that the project will not make a cumulatively considerable contribution to global climate change. In addition, climate impact analyses for long range plans must demonstrate consistency with the State's goals to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 and achieve carbon neutrality by 2045 or align with a local GHG reduction strategy that meets the criteria outlined in State CEQA Guidelines Section 15183.5(b).

As discussed under Impact GHG-1 and GHG-2, the proposed project's office site would comply with the Air District's 2022 GHG CEQA Guidance by incorporating all-electric appliances and Mitigation Measure GHG-1, EV infrastructure consistent with CALGreen Tier 2 voluntary standards, and by reducing VMT per capita for office uses. In addition, the office site would install a one megawatt onsite solar microgrid, all-electric appliances, and energy and water efficient appliances, consistent with the Climate Plan and Sonoma Climate Mobilization Strategy. For the residential site, the project would also add the forementioned green building and project design features and would be consistent with the Climate Plan and Sonoma Climate Mobilization Strategy. Thus, based on the *CEQA* Guidelines for determining the significance of GHG emissions, while cumulative impacts are considered significant, the proposed project's contribution to cumulative GHG emissions impacts would not be cumulatively considerable.

4.8 Hazards and Hazardous Materials

This section addresses project impacts associated with hazards and hazardous materials. Specifically, this analysis addresses impacts related to hazardous materials use and transportation, the accidental release of hazardous materials, new development or development on contaminated sites, air traffic hazards, and interference with emergency response and evacuation plans. This section is based, in part, on the Phase I Environmental Site Assessment (ESA) prepared by EBA Engineering for the project in October 2025 (Appendix I).

4.8.1 Setting

a. Fundamentals

Hazardous Materials

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

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

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

Hazardous Building Materials

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

Prior to the United States Environmental Protection Agency (USEPA) ban in 1978, lead-based paint was commonly used on interior and exterior surfaces of buildings. Activities such as sanding and scraping, renovation work, gradual wear and tear, old peeling paint, and paint dust particulates have been found to contaminate surface soils or cause lead dust to migrate and affect indoor air quality. Exposure to residual lead can cause severe health effects, especially in children. For example, when children are exposed to lead, the adverse health effects can include hearing problems, headaches, and lowered IQ (USEPA 2025).

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

Hazardous Substances

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

Hazardous Materials Listing

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

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

b. Presence of Hazardous Materials

According to databases of hazardous material sites maintained by the DTSC (EnviroStor) and the SWRCB (GeoTracker), hazardous sites are either “Completed-Case Closed” in the vicinity of the project area (DTSC 2024; SWRCB 2024a). Sites that are identified as “Completed – Case Closed” are sites that have completed remedial or cleanup actions and a formal closure decision document has been issued for the site. Within the project area, there are no identified open, active hazardous materials sites, or open assessment sites. There is one closed LUST Cleanup Sites within 1,000 feet of the project site at 777 Steele Lane. The site was closed in 2014 (SWRCB 2024a).

There are no solid waste disposal sites identified by the SWRCB with waste constituents exceeding hazardous waste levels outside the waste management unit within the county. The nearest site is located within the City of Vallejo, approximately 42 miles southeast of Santa Rosa (California Environmental Protection Agency [CalEPA] 2024a).

The Phase I ESA was prepared by EBA Engineering to evaluate if there are any recognized environmental conditions (REC) on the project site. RECs are defined as the presence or likely presence of hazardous substances due to a release to the environment, or the presence of hazardous materials under conditions that pose a threat of the future release of hazardous materials to the environment (Appendix I). A Phase I ESA includes a records review, historical records research, and interviews with previous owners, occupants, and government officials, and an analysis of the project site's physical setting. Based on the results of the Phase I ESA, no RECs are present on the project site (Appendix I).

c. Proximity to Schools

School locations require consideration, because children are particularly sensitive to hazardous materials exposure. The city also includes sensitive land uses such as hotels and motels; group homes, churches; other learning institutions; and libraries. The Santa Rosa City Schools (SRCS) provides public school services to the City of Santa Rosa. SRCS operates ten elementary schools, four middle schools, and six high schools (SRCS 2025). The closest school to the project site is Steele Land Elementary School, located approximately 700 feet south of the project site.

d. Airports and Aircraft Hazards

The nearest airport to the project site is the Charles M. Schulz Sonoma County Airport, located approximately five miles northwest of the project site. Additionally, no portion of the project site is identified as within an airport influence area or airport safety zone (County of Sonoma 2025).

4.8.2 Regulatory Setting

a. Federal Regulations

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

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

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

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

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

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

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

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

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

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

Regulations for Lead-Based Paint (LBP) are contained in the Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations (CFR) Part 35, governed by the U.S. Housing and Urban Development (HUD), which requires sellers and lessors to disclose known LBP and LBP hazards to perspective purchasers and lessees. Additionally, all LBP abatement activities must be in compliance with California and Federal OSHA and with the State of California Department of Health Services requirements. Only LBP trained and certified abatement personnel are allowed to perform abatement activities. All lead LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

Code of Federal Regulations

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

Federal Clean Air Act

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

Emergency Response Plans

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

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

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

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

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code section 8607(a) for managing emergencies involving multiple jurisdictions and agencies. The SEMS incorporates the functions and principles of the Incident Command System (ICS), the Master Mutual Aid Agreement (MMAA), existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination (California Office of Emergency Services [CalOES] 2022). Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs (CalOES 2024). The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and state

(CalOES 2022). CalOES divides the state into six mutual aid regions. The City of Santa Rosa is located in California Mutual Aid Region II, which includes Del Norte, Humboldt, Mendocino, Lake, Sonoma, Marin, Napa, Solano, Contra Costa, San Francisco, Alameda, San Mateo, Santa Clara, Santa Cruz, San Benito, and Monterey Counties (CalOES 2024). In an emergency, governmental response is an extension of responsibility and action, coupled with normal day-to-day activity. Normal governmental duties will be maintained, with emergency operations carried out by those agencies assigned specific emergency functions. The Sonoma County/Operational Area Emergency Operations Plan (discussed further below) addresses the planned response to extraordinary emergency situations associated with large-scale disasters, identifies roles and responsibilities of departments within the county, and identifies hazards that might affect the Operational Area (County of Sonoma 2024b).

b. State Regulations

The primary State agencies with jurisdiction over hazardous chemical materials management within the project area are the California Environmental Protection Agency's (CalEPA's) DTSC and the North Coast Regional Water Quality Control Board (RWQCB). Other State agencies involved in hazardous materials management include California OSHA (CalOSHA) and the CalOES.

Department of Toxic Substances Control

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

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

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

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

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

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

California Code of Regulations (CCR)

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

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

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

Occupational Safety and Health Act and California Labor Code, Section 6300 et seq.

The Cal OSHA program is administered and enforced by the Division of Occupational Safety and Health. CalOSHA is similar to the federal OSHA program. Both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, CalOSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

The CalOES Hazardous Materials (HazMat) section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the HazMat section staff is called upon to provide State and local emergency managers with emergency coordination and technical assistance.

The California Occupational Safety and Health Act of 1973 addresses California employee working conditions, enables the enforcement of workplace standards, and provides for advancements in the field of occupational health and safety. The Act also created CalOSHA, the primary agency

responsible for worker safety in the handling and use of chemicals in the workplace. CalOSHA's standards are generally more stringent than federal regulations. Under the former, the employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure. The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. At sites known or suspected to be contaminated by hazardous materials, workers must have training in hazardous materials operations and a site health and safety plan must be prepared to establish policies and procedures to protect workers and the public from exposure to potential hazards at the contaminated site.

California Code of Regulations, Title 22, Hazardous Waste Management

At the State level, under Title 22, Division 4.5 of the CCR, CalEPA's DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA and the California Health and Safety Code. The Hazardous Waste Control Law, under CCR 22, Chapter 30, establishes regulations that are similar to RCRA but more stringent in their application and empowers the DTSC to administer the State's hazardous waste program and implement the federal program in California. The DTSC is responsible for permitting, inspecting, ensuring compliance, and imposing corrective action programs to ensure that entities that generate, store, transport, treat, or dispose of potentially hazardous materials and waste comply with federal and State laws. The DTSC defines hazardous waste as waste with a chemical composition or other properties that make it capable of causing illness, death, or some other harm to humans and other life forms when mismanaged or released into the environment.

The DTSC shares responsibility for enforcement and implementation of hazardous waste control laws with the SWRCB and, at the local level, the RWQCB, and city and county governments.

California Code of Regulations Title 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b)

CCR 23, Chapter 15 Discharges of Hazardous Waste to Land section 2511(b) pertains to water quality aspects of waste discharge to land. The regulation establishes waste and site classifications as well as waste management requirements for waste treatment, storage, or disposal in landfills, surface impoundments, waste piles, and land treatment facilities. Requirements are minimum standards for proper management of each waste category, which allows Regional Water Boards to impose more stringent requirements to accommodate regional and site-specific conditions. In addition, the requirements of CCR 23, Chapter 15 applies to cleanup and abatement actions for unregulated hazardous waste discharges to land (e.g., spills).

License to Transport Hazardous Materials – California Vehicle Code, Section 32000.5 et seq.

The California Department of Transportation (Caltrans) regulates hazardous materials transportation on all interstate roads. Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are the California Highway Patrol and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials.

California Fire Code, Title 24, Part 9

The 2022 California Fire Code, written by the California Building Standards Commission, is based on the 2021 International Fire Code (IFC). The IFC is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. The IFC addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

c. Regional and Local Regulations

Bay Area Air District (BAAD)

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

Sonoma County Fire Prevention and Hazardous Materials Division

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

Sonoma County Multijurisdictional Hazard Mitigation Plan

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

Sonoma County Emergency Operations Plan (EOP)

The Sonoma County EOP (March, 2022) is a guidebook for the Sonoma County Operational Area to utilize during phases of an all-hazards emergency management process which include preparedness, response, recovery, and mitigation. The EOP is intended to facilitate coordination between agencies and jurisdictions within Sonoma County while ensuring the protection of life, property, and the environment during disasters. In accordance with California's Standardized Emergency Management System (SEMS), this Plan provides the framework for a coordinated effort between partners and provides stability and coordination during a disaster.

Sonoma County Municipal Code

The Sonoma County Municipal Code, Chapter 13, Sonoma County Fire Code, outlines the California Fire Code, as adopted with local amendments. Article V of Chapter 13 establishes minimum fire safe

standards for development within the unincorporated County. Chapter 13 also requires fire sprinklers in residential developments and Chapter 13A requires removal of hazardous vegetation and combustible material from around the exterior of improvements in unincorporated areas of the County.

Chapter 29 of the Sonoma County Municipal Code is also known as the Hazardous Materials Management Ordinance. Section 29-3 states that the intent of Chapter 29 is to regulate the storage, handling, and management of hazardous materials, whether in waste or non-waste form, unless specifically preempted by state or federal law. Section 29-6 prohibits the storage of hazardous materials in a manner which causes an actual or threatened disposal or release of hazardous materials into the environment or poses a significant risk of such actual or threatened disposal or release. Pursuant to Section 29-7, a consolidated permit is required to store or handle hazardous materials for those programs as defined in Title 27, Division 1, Subdivision 4, Chapter 1 of the CCR except for private households storing or handling reasonable household quantities of hazardous materials in consumer-sized containers for domestic use.

Regulatory action includes, but is not limited to, suspension or revocation of a permit, an order to cease noncompliance with the terms or conditions of a permit, an order to correct a condition, or cease a practice, or other regulatory actions may be taken against the permittee for reasons listed in section 29-19. Among the reasons for regulatory action listed in section 29-19 is failure to correct conditions constituting an unreasonable risk of any actual or threatened disposal or release of hazardous materials within a reasonable time after notice from any governmental entity. The operator, owner, or handler of hazardous materials must institute and complete all actions necessary to remedy the effects of an actual or threatened release (section 29-16).

Sonoma County General Plan

The Public Safety Element of the Sonoma County General Plan is intended to protect the community from unreasonable risks from natural hazards. The Sonoma County Hazard Mitigation Plan is incorporated into the Safety Element by reference. The following goals and objectives from the Safety Element pertaining to hazardous materials are applicable to the proposed project:

Goal PS-4: Prevent unnecessary exposure of people and property to risks of damage or injury from hazardous materials.

Objective PS-4.2: Regulate the handling, storage, use, and disposal of hazardous materials in order to reduce the risks of damage and injury from hazardous materials.

Policy PS-4a: While maintaining the autonomy granted to it pursuant to State zoning laws, implement Federal, State, and County requirements for the storage, handling, disposal, and use of hazardous materials, including requirements for management plans, security precautions, and contingency plans.

Policy PS-4c: Require a use permit for any commercial or industrial use involving hazardous materials in threshold planning quantities as determined by Federal and State laws. Hazardous materials management plans shall be required as a condition of approval for such permits.

Policy PS-4d: Work with applicable regulatory agencies to regulate the transportation of hazardous materials consistent with adopted County policies.

Policy PS-4m: Continue to educate the public about, encourage, and promote the reduction in use of hazardous materials and the use of safe alternatives to hazardous materials in County operations and private businesses.

Santa Rosa General Plan 2050

The Santa Rosa General Plan 2050 is not applicable to the project. However, for informational purposes, the following objectives and policies from the Safety Element of the Santa Rosa General Plan are related to hazardous materials:

Objective 5-4: Protect all community members and businesses from hazardous materials exposures and releases.

Policy 5-4.1: Reduce the potential for hazardous materials exposure to community members, visitors, and employees.

Policy 5-4.2: Minimize risks to human health from hazardous materials.

Policy 5-4.3: Ensure adequate capacity and safeguards on routes used to transport hazardous materials to prevent or minimize impacts from accidental release.

4.8.3 Impact Analysis

a. Significance Thresholds and Methodology

The following thresholds of significance were developed based on Appendix G of the *CEQA Guidelines*. The project would have a significant impact with respect to hazards and hazardous materials if it would:

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

Significance thresholds 6 and 7 pertain to wildfire, such as risk of exposure to fire and conflicts with evacuation during a wildfire emergency. The impacts associated with thresholds 6 and 7 are evaluated and discussed in Section 4.17, Wildfire.

Methodology

The following section describes the potential environmental impacts of the proposed project relevant to hazards and hazardous materials. The impact analysis is based on an assessment of baseline conditions, including locations of hazardous materials use and storage, existing contaminated sites, and emergency response and evacuation plan requirements. This analysis identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to the proposed project. This analysis focuses on the potential nature and magnitude of risk associated with the accidental release, storage, transportation, and use of hazardous materials during operations of the office site and residential site (which includes 20,000 square feet of retail/commercial space) of the proposed project.

b. Impact Analysis

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

Impact HAZ-1 THE PROPOSED PROJECT WOULD NOT INVOLVE THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF SUBSTANTIAL AMOUNTS OF HAZARDOUS SUBSTANCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

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

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, State and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest, which includes forms, reports, and procedures designed to seamlessly track hazardous waste.

Overall Project (Office and Residential Sites)

Construction

The use of construction machinery would involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. Additionally, hazardous materials would be needed for fueling and servicing construction equipment. The U.S. Department of

Transportation, Pipeline and Hazardous Materials Safety Administration regulates the transportation of hazardous materials, as described in Title 49 of the CFR. Title 13 of the CCR additionally regulates the transportation of hazardous materials by designating appropriate hazard labels shipping preparation, vehicle loading, and hazardous materials registration, among other requirements. Documentation of compliance with hazardous materials regulations codified in Titles 8, 22, and 26 of the CCR is required for all hazardous materials and hazardous waste transport. In addition, individual contractors are required to comply with all applicable federal and State laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to, Title 49 of the CFR. Adherence to applicable regulations and laws would reduce the potential hazards associated with the transport of hazardous materials, including accidental release of hazardous materials during transport to the project site for construction activities. These types of hazardous materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by County, State, and federal regulations. Additionally, as construction of the office site and the residential site would each individually exceed 1 acre of ground disturbance, implementation of a SWPPP would be required compliant with the NPDES. The SWPPP includes measures to clean accidental spills of construction fluids, such as equipment leaks. Compliance with applicable standards discussed in Section 4.8.2, *Regulatory Setting*, would ensure impacts from construction-related hazardous materials would be less than significant.

Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials during construction. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Therefore, construction would not result in a hazard to the public or the environment through routine transport, use or disposal of hazardous materials, and this impact would be less than significant.

Operation

The proposed office site of the project would provide new and modern office space and parking on the project site. The types of County activities and operations that occur on the project site would not change from existing conditions. Therefore, the proposed office site of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials beyond existing baseline conditions.

The proposed residential site of the project would result in private households storing or handling reasonable household quantities of hazardous materials in consumer-sized containers for domestic use. Residential uses do not utilize substantial quantities of hazardous materials, and thereby the residences would pose no risk of exposing the public to substantial quantities of hazardous materials. The residential buildings may include up to 20,000 square feet of retail/commercial uses, primarily on the ground floor(s). Depending on the type of commercial uses, hazardous materials may be stored and used in quantities exceeding regular household amounts in the portion of the project site proposed for residential development. Commercial uses would be subject to compliance with CCR, Cal OSHA, and other agency requirements to ensure hazardous materials risks to the public are minimized during operational use and transport as well. Specifically, commercial uses with storage and use of hazardous materials would be subject to Chapter 29 of the Sonoma County

Municipal Code. Section 29-6 would prohibit the storage of hazardous materials in a manner which causes an actual or threatened disposal or release of hazardous materials into the environment or poses a significant risk of such actual or threatened disposal or release. Pursuant to section 29-7, a consolidated permit would be required to store or handle hazardous materials for those programs as defined in Title 27, Division 1, Subdivision 4, Chapter 1 of the CCR.

Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials. Oversight by the appropriate federal, State, and local agencies and compliance with applicable regulations related to the handling and storage of hazardous materials would minimize the hazard to the public or environment from the routine transport, use, or disposal of hazardous materials. Therefore, operation would not result in a hazard to the public or the environment through routine transport, use or disposal of hazardous materials, and this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact HAZ-2 OPERATION OF THE PROJECT WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT. HOWEVER, DEMOLITION ACTIVITIES WOULD CREATE A SIGNIFICANT HAZARD. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION.

Overall Project (Office and Residential Sites)

Construction

Asbestos is a naturally occurring fibrous material that was extensively used as a fireproofing and insulating agent in building construction materials before such uses were banned by the U.S. Environmental Protection Agency in the 1970s. Asbestos-containing materials (ACMs) were commonly used for insulation of heating ducts as well as ceiling and floor tiles. Undisturbed ACMs contained within building materials present no significant health risk because there is no exposure pathway. However, once these tiny fibers are disturbed, they can become airborne and become a respiratory hazard. The proposed project would involve the demolition of the existing structures on the project site, some of which date prior to EPA restrictions on the use of asbestos. Therefore, project demolition activities would have potential to expose construction workers to asbestos containing materials due to the age of the existing structures.

Additionally, construction workers could also be exposed to lead-based paint during demolition of existing structures. Lead is hazardous to human health. Lead-based paint and other lead-containing materials associated with the proposed project would be required to be handled in compliance with

Cal/OSHA regulations regarding lead-based paints and materials. The CCR, section 1532.1, requires testing, monitoring, containment, and disposal of lead-based paints and materials, such that exposure levels do not exceed Cal/OSHA standards. Compliance with applicable Cal/OSHA regulations would ensure impacts related to lead-based paint would be less than significant.

Friable asbestos containing materials are regulated as a hazardous air pollutant under the Clean Air Act, and the Bay Area Air District regulates asbestos containing materials in Regulation 11, Rule 2, which governs the proper handling and disposal of asbestos containing materials for demolition activities. As a worker safety hazard, asbestos containing materials are also regulated under the authority of Cal/OSHA. In structures slated for demolition, asbestos containing materials would be abated in accordance with state and federal regulations prior to the start of demolition activities and in compliance with all applicable existing rules and regulations. However, if construction workers are unaware of the potential presence of asbestos containing materials, regulations may not be properly implemented, leaving workers vulnerable to exposure to asbestos containing materials, as well as lead. Likewise, people working or living nearby could also be exposed to asbestos containing materials in dust from construction. This would be a potentially significant impact because it could affect health. Therefore, implementation of Mitigation Measure HAZ-1 is required to ensure that asbestos-containing materials and lead-based paint are properly identified and managed prior to demolition.

Project construction would require the transport of construction equipment and fuels to the project site. This equipment and fuel, such as diesel fuel and gasoline, would be stored on-site for the duration of construction. If these fuels and other hazardous equipment fluids, such as motor oil, were to leak or be spilled they could create substantial hazards to the public or the environment. For example, if a diesel fuel spill were to occur during project construction, the fuel could become runoff and discharge to surface waters, which would be a substantial hazard to the environment. Construction of the office site and residential site would each require ground disturbance over an area exceeding 1 acre. Therefore, the County is required to develop and implement a Stormwater Pollution Prevention Plan (SWPPP), pursuant to state regulations. The SWPPP must include containment and clean-up measures to implement in the event of a leak or spill of construction fluids, such as equipment diesel fuel. Mandatory implementation of the SWPPP would reduce potential impacts associated with release of substantial hazards from construction equipment and fluids to less than significant.

Operation

The proposed office site of the project would provide new and modern office space and parking under solar arrays on the office site. The types of County activities and operations that occur on the project site would not change from existing conditions. Therefore, the proposed office site would not bring new or substantial increases in hazardous materials onto the project site compared to existing conditions. Operation of the office site of the project would not increase the risk of accidental spills of hazardous materials on the project site.

The proposed residential site of the project would result in private households storing or handling reasonable household quantities of hazardous materials in consumer-sized containers for domestic use. Residential uses do not utilize substantial quantities of hazardous materials, and thereby the residences would pose no risk of exposing the public to substantial quantities of hazardous materials in the event of an accidental spill or release.

The residential buildings may include up to 20,000 square feet of retail/commercial uses. Depending on the type of commercial uses, hazardous materials may be stored and used in quantities exceeding regular household amounts in the portion of the project site proposed for residential development. Commercial uses would be subject to compliance with CCR, Cal OSHA, and other agency requirements to ensure hazardous materials risks to the public are minimized during operational use. Specifically, commercial uses with storage and use of hazardous materials would be subject to Chapter 29 of the Sonoma County Municipal Code. Section 29-6 would prohibit the storage of hazardous materials in a manner which causes an actual or threatened disposal or release of hazardous materials into the environment or poses a significant risk of such actual or threatened disposal or release. Pursuant to section 29-7, a consolidated permit would be required to store or handle hazardous materials for those programs as defined in Title 27, Division 1, Subdivision 4, Chapter 1 of the CCR.

Mitigation Measures

HAZ-1 Project Demolition Activities

In conformance with State and local laws, a visual inspection/pre-demolition survey, and possible sampling, shall be conducted prior to the demolition of on-site building(s) to identify asbestos-containing materials (ACMs) and lead-based paint. Documentation of the survey shall be provided to the County prior to commencement of demolition activities.

During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Title 8, CCR, section 1532.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the type of lead being disposed.

All potentially friable asbestos containing materials shall be removed in accordance with National Emission Standards for Air Pollution (NESHAP) guidelines prior to demolition or renovation activities that may disturb ACMs. All demolition activities shall be undertaken in accordance with Cal/OSHA standards contained in Title 8, CCR, section 1529, to protect workers from asbestos exposure.

A registered asbestos abatement contractor shall be retained to remove and dispose of asbestos-containing materials identified in the asbestos survey performed for the site in accordance with the standards stated above in this mitigation measure. Materials containing more than one-percent asbestos are also subject to Bay Area Air District regulations. Removal of materials containing more than one-percent asbestos shall be completed in accordance with Bay Area Air District requirements and notifications.

Based on Cal/OSHA rules and regulations, the following actions shall be implemented to limit impacts to construction workers:

- Prior to commencement of demolition activities, a building survey, including sampling and testing, shall be completed to identify and quantify building materials containing lead-based paint.
- During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR, section 1532.1, including employee training, employee air monitoring and dust control.
- Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the type of waste being disposed.

Significance After Mitigation

This impact would be less than significant with mitigation.

Threshold 3:	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-3 DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN HAZARDOUS EMISSIONS OR HANDLING OF HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES OR WASTE WITHIN 0.25 MILE OF AN EXISTING OR PROPOSED SCHOOL. HOWEVER, COMPLIANCE WITH EXISTING REGULATORY REQUIREMENTS WOULD MINIMIZE RISKS TO SCHOOLS AND THEIR OCCUPANTS, RESULTING IN A LESS THAN SIGNIFICANT IMPACT.

Overall Project (Office and Residential Sites)

The proposed project is located within 0.25-mile of Steele Lane Elementary School, located approximately 700 feet south of the project site. There are no other schools within 0.25 mile of the project site. Children are particularly susceptible to long-term effects from exposure to hazardous materials. Locations where children spend extended periods of time, such as schools, are considered sensitive to hazardous air emissions and accidental release associated with the handling of extremely hazardous materials, substances, or wastes.

Operation of the proposed office site would not be reasonably expected to generate hazardous materials or waste, other than minor quantities typically used for cleaning. The proposed office site of the project would provide new and modern office space and parking under solar arrays on the office site. The types of County activities and operations that occur on the project site would not change from existing conditions. Therefore, the proposed office site of the project would not reasonably be expected to result in hazardous emissions or handling of hazardous or acutely hazardous materials, substances or waste as compared to existing conditions.

Operation of the proposed residential site would not be reasonably expected to generate hazardous materials or waste, other than minor quantities typically used for cleaning or landscaping maintenance. The project also includes up to 20,000 square feet of retail/commercial uses within the residential site. Depending on the specific tenant types, these uses could involve the storage and use of hazardous materials in quantities exceeding typical household amounts (e.g., cleaning agents, maintenance supplies). However, any commercial uses involving hazardous materials would be required to comply with applicable federal, state, and local regulations, including Cal/OSHA requirements, CCR Titles 8, 22, and 27, and Chapter 29 of the Sonoma County Municipal Code. These regulations govern the storage, handling, and disposal of hazardous materials and are intended to minimize the potential for accidental releases and public exposure, including at nearby sensitive receptors such as schools.

As detailed under Impact HAZ-1 and HAZ-2, construction of the office site and residential site could involve both the use and transport of both hazardous materials and hazardous wastes and would be required to be managed by BMPs. In addition, the use of common construction hazardous materials and wastes in quantities needed for an office, residential and retail/commercial development of this size would not be expected to present hazards to the school. The use of such materials would present a potential impact were they to be transported near the elementary school; however, as discussed under Impact HAZ-1 above, Title 13 of the CCR additionally regulates the transportation of hazardous materials by designating appropriate hazard labels shipping preparation, vehicle loading,

and hazardous materials registration, among other requirements. Documentation of compliance with hazardous materials regulations codified in Titles 8, 22, and 26 of the CCR is required for all hazardous materials and hazardous waste transport. Compliance with applicable regulations would reduce the potential risks to schools during transport of hazardous construction materials. Operation would not involve routine emissions of hazardous materials or potential for such emissions proximate to the school and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

This impact would be less than significant without mitigation.

Threshold 4:	Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact HAZ-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN DEVELOPMENT ON SITES LISTED PURSUANT TO GOVERNMENT CODE SECTION 65962.5. AS SUCH, THE PROPOSED PROJECT WOULD HAVE NO IMPACT.

Overall Project (Office and Residential Sites)

As described in Section 4.8.1(b), *Prescence of Hazardous Materials*, there is one closed LUST site within 1,000 feet of the project area, but there are no active or open hazardous materials sites. In addition, based on the results of the Phase I ESA, no RECs are present on the project site (Appendix I). The project site is not a site appearing on a list of hazardous material sites compiled pursuant to Government Code section 65962.5. Therefore, the office site and residential site would have no impact associated with listed hazardous sites.

Mitigation Measures

No mitigation is required.

Level of Significance

There would be no impact.

Threshold 5:	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact HAZ-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT BE LOCATED WITHIN AN AIRPORT LAND USE PLAN OR WITHIN TWO MILES OF A PUBLIC AIRPORT AND PEOPLE RESIDING OR WORKING IN THE PLAN AREA WOULD NOT BE EXPOSED TO AIRPORT SAFETY HAZARDS OR EXCESSIVE NOISE. NO IMPACT WOULD OCCUR.

Overall Project (Office and Residential Sites)

There are no public or private airports within the project area. The nearest airport is the Sonoma County Airport, approximately five miles northwest of the project site. Additionally, the project site is not within an airport influence area or airport safety zone. Therefore, the office site and residential site would have no impact related to excessive safety or noise hazards within airport land use plan areas or in proximity to airports.

Mitigation Measures

No mitigation is required.

Level of Significance

There would be no impact.

4.8.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative hazardous materials impacts is limited to projects within Santa Rosa that are east of Highway 101 and west of the intersection of Franklin Avenue and Chanate Road. This geographic scope is appropriate for hazardous materials because risks associated with hazards and hazardous materials occur largely in a site-specific and localized context as adverse impacts from a hazardous materials release or spill diminish in magnitude with distance.

Continued urban development has the potential to increase exposure to hazards. However, overall, hazards and hazardous materials impacts associated with individual developments are site specific in nature and must be addressed on a case-by-case basis. The magnitude of hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Since hazards and hazardous materials are required to be examined as part of the permit application and environmental review process, it is reasonably anticipated that potential impacts associated with individual projects will be adequately addressed and mitigated prior to permit approval. Compliance with regulatory requirements would avoid potential hazard impacts associated with cumulative development. With adherence to existing policies and other local, regional, state, and federal regulations, cumulative human or environmental health impacts would be less than significant.

4.9 Hydrology and Water Quality

This section analyzes the proposed project's potential impacts to hydrology and water quality, including the proposed project's potential to result in substantial water quality impairment, substantially decrease groundwater supplies or interfere with groundwater recharge, substantially alter existing drainage patterns, risk pollutant release during inundation, and obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.9.1 Setting

a. Project Site Setting

Watersheds and Surface Waters

The project site is located within the Laguna de Santa Rosa watershed which covers approximately 59 square miles in south-central Sonoma County (California Department of Transportation 2025; California Department of Fish and Wildlife 2025). For regulatory purposes, the North Coast Regional Water Quality Control Board (RWQCB) uses the watershed classification system developed by the Department of Water Resources (DWR), which divides watersheds into Hydrologic Units that are divided into Hydrologic Areas and Hydrologic Sub-Areas. As designated by the North Coast RWQCB, the project site is located within the Russian River Hydrological Unit, the Middle Russian River Hydrologic Area, and the Santa Rosa Hydrologic Sub-Area (North Coast RWQCB 1991).

The project site is adjacent to the north side of Administration Drive, and Paulin Creek is located adjacent to south side of Administration Drive in the project area. The State Water Resources Control Board (SWRCB) has listed Paulin Creek as impaired by a variety of pollutants, including sedimentation/siltation, indicator bacteria, and water temperature (SWRCB 2024).

Hydrology and Drainage

The project site is relatively flat and primarily developed with existing impervious surfaces covering the majority of the project site. Stormwater on the project site drains to a series of stormwater drain inlets on Fiscal Drive and bordering the project site which are conveyed through the city's stormwater drainage system. In addition, catch basins are located on Administration Drive which discharge to Paulin Creek (City of Santa Rosa 2025).

Groundwater

The project site overlies the Santa Rosa Valley – Santa Rosa Plain subbasin (basin), a 125 square mile groundwater basin that underlies Sonoma County (DWR 2004; DWR 2025a). The basin is bounded on the northwest by the Russian River plain approximately one mile south of the city of Healdsburg. The southern end of the basin contains a series of low hills which form a drainage divide that separates the Santa Rosa Valley from the Petaluma Valley basin south of the city of Cotati. The eastern basin boundary abuts the Sonoma Mountains south of Santa Rosa and the Mayacamas Mountains north of Santa Rosa (DWR 2004). The total storage capacity of the basin is estimated to be approximately 948,000 acre-feet. The principal sources of recharge to the basin are direct infiltration of precipitation and infiltration of streams. The basin's shallow aquifer system receives most of this recharge. Recharge that reaches the deeper aquifer zones is less well-defined and appears to come from a combination of leakage from overlying shallow aquifers and mountain-front

recharge (Santa Rosa Plain Groundwater Sustainability Agency 2023). Some areas of the basin produce water with elevated iron and manganese, contributing to elevated water hardness. Groundwater within the basin ranges from near-surface to approximately 50 feet below ground surface. Within the City of Santa Rosa, groundwater elevations have been within 10 to 30 feet below ground surface since 1989, indicating adequate groundwater recharge is occurring (City of Santa Rosa 2021). Based on the nearest groundwater well to the project site, located approximately 0.50-mile west of the project site, groundwater levels underlying the project site are approximately 10 feet below ground surface (DWR 2025b).

Flooding and Inundation

According to the Federal Emergency Management Agency's (FEMA) National Flood Hazard Layer Viewer, the project site is within Zone X which is an area located outside of a flood hazard zone (FEMA 2025).[1] Tsunamis and seiches are two types of water waves that are generated by earthquake events. Tsunamis are broad-wavelength ocean waves and seiches are standing waves within confined bodies of water, typically reservoirs. The project site is approximately 22 miles east of the Pacific Ocean and therefore not subject to tsunami. The nearest large body of water is Lake Hennessy, located approximately 18.2 miles east of the project site. No large, enclosed bodies of water, such as a reservoir, are proximate to the project site and thus the project site is not subject to inundation from seiche.

The Piner Creek dam is located approximately 0.9-mile east of the project site. According to DWR's Dam Breach Inundation Map Web Publisher, the project site is located within the inundation zone of the Piner Creek dam (DWR 2025c).

4.9.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The Federal Water Pollution Prevention and Control Act was enacted in 1948 to ensure that discharges do not substantially degrade the physical, chemical, or biological integrity of the Nation's waters. In 1972, the Federal Water Pollution Control Act was amended (and at that time became known as the Clean Water Act [CWA]) to prohibit discharge of pollutants to waters of the United States from any point source unless it is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. Specifically, section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) Regulations for stormwater and other pollutant discharges.

Congress amended the CWA in 1987 to require the implementation of a two-phased program to address stormwater discharges. Phase I, promulgated by the U.S. Environmental Protection Agency (USEPA) in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4)[2] serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and ten categories of industrial activities. USEPA

[1] The FEMA map which the project site is located within, Map No. 06097C0728E, is a non-printed panel. Non-printed panels are used by FEMA to indicate the area is entirely located within a single flood zone.
[2] An MS4 is a conveyance or system of conveyances designed or used to collect or convey stormwater (e.g., storm drains, pipes, ditches) that are owned by a state, city, town, or other public entity and discharge to the waters of the United States.

designates the City of Santa Rosa and unincorporated Sonoma County as regulated MS4 co-permittees under Phase I.

In addition, sections 401 and 404 of the CWA establish regulations for the discharge of dredged or fill material into waters of the United States and water quality impacts associated with these discharges.

When designated beneficial uses of a particular water body are being compromised by water quality, section 303(d) of the CWA requires identifying and listing that water body as impaired. Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body.

National Flood Insurance Program

Congress acted to reduce the costs of disaster relief by passing the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973. The intent of these acts was to reduce the need for large, publicly funded flood control structures and disaster relief efforts by restricting development in floodplains. FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in a floodplain. FEMA issues Flood Insurance Rate Maps of communities participating in the NFIP. These maps delineate flood hazard zones in the community.

b. State Regulations

Porter-Cologne Water Quality Control Act of 1970

The federal CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs. California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and the nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the federal CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface water and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product. Each RWQCB must formulate and adopt a water quality control plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its state water policy. The Porter-Cologne Act also provides that an RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The project site is within the jurisdictional boundaries of the North Coast RWQCB.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) of 2014 is a comprehensive three-bill package that the governor of California signed into California State law in September 2014. The

SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention if necessary to protect the resource. The plan is intended to ensure a reliable groundwater supply for California for years to come. The SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts of groundwater basins. The SGMA requires the formation of local groundwater sustainability agencies that are required to adopt Groundwater Sustainability Plans to manage the sustainability of the groundwater basins. DWR has designated the basin as a medium-priority basin (DWR 2025a).

Construction Stormwater General Permit

The *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), adopted by the SWRCB, regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction Stormwater General Permit authorizes the discharge of stormwater to surface waters from construction activities. The Construction Stormwater General Permit requires that all developers of land where construction activities will occur over more than one acre do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction Stormwater General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology/ Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs;
- Conduct stormwater sampling, if required based on risk level; and
- Conduct monitoring and sampling during dewatering activities of impounded stormwater.

To obtain coverage in accordance with the Construction Stormwater General Permit, a project applicant must electronically file all permit registration documents with the SWRCB prior to the start of construction. Permit registration documents must include:

- Notice of Intent, including Risk Level determination;
- Site Drawings and Maps;
- SWPPP;
- Applicable plans, calculations, and other supporting documentation for compliance with existing permitted Phase I or Phase II municipal separate storm sewer system post-construction requirements or the post-construction standards of the Construction Stormwater General Permit;
- Annual fee per the current 23 California Code of Regulations Chapter 9 fee schedule for NPDES stormwater permits; and
- All applicable additional Permit Registration Document information.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, and control pollutants from construction materials.

c. Local Regulations

The project site is owned by the County of Sonoma and is not subject to the Santa Rosa Municipal Code. The project site is served by the storm drain system owned and operated by the County of Sonoma Public Infrastructure which maintains, maps, and oversees stormwater on the project site.

Water Quality Control Plan

The North Coast RWQCB has adopted a Water Quality Control Plan for the North Coast Region (Basin Plan) for their region of responsibility that delineates water resource area boundaries based on hydrological features (North Coast RWQCB 2018). For the purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the surface waters and groundwater management zones described in the Basin Plan. Once beneficial uses are designated, appropriate water quality objectives are established, and programs that maintain or enhance water quality are implemented to ensure the protection of beneficial uses.

The Basin Plan also established implementation programs to achieve water quality objectives to protect beneficial uses and require monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State antidegradation policy (SWRCB Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin

The Santa Rosa Plain Groundwater Sustainability Agency is the applicable groundwater sustainability agency that manages the basin through implementation of the *Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin* (Santa Rosa Plain Groundwater Sustainability Agency 2023). The Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin outlines a comprehensive strategy to manage and sustain groundwater resources in the basin. The plan aims to ensure long-term water availability for all users, including natural environments, municipalities, agriculture, and businesses. The plan includes detailed technical information, sustainable management criteria, and an implementation plan with projects and policies to achieve and maintain groundwater sustainability over the next 50 years.

Phase I Municipal Stormwater Permit

The City of Santa Rosa and the County of Sonoma are co-permittees of the *National Pollutant Discharge Elimination System Permit and Waste Discharge Requirements for Discharges From the Municipal Separate Storm Sewer Systems* (North Coast MS4 Permit), Order R1-2015-0030, NPDES No. CA0025054. The North Coast MS4 Permit regulates discharges into the MS4 system in the cities and county areas within Sonoma County.

All new development or redevelopment projects that create or replace 10,000 square feet of impervious surfaces are subject to post-construction BMP implementation, also known as Low Impact Development (LID). Projects that create or replace more than one acre of impervious surface are also required to comply with the hydromodification provisions of the MS4 permit, which requires capturing and retaining 100 percent of the volume of runoff generated by a 1.0-inch rainfall event over a 24-hour period.

The City of Santa Rosa has published a *Low-Impact Development Technical Design Manual* (City of Santa Rosa LID Technical Manual) which provides requirements to reduce storm water pollution in accordance with the North Coast MS4 Permit. The City of Santa Rosa LID Technical Manual includes

and prioritizes LID BMPs to detain, retain, and treat runoff. LID BMPs incorporate and conserve on-site natural features, together with constructed hydrologic controls to more closely mimic pre-development hydrology and watershed processes. Because the County of Sonoma does not have a published LID design manual, it utilizes the City of Santa Rosa LID Technical Manual for MS4 compliance.

Bay Area Stormwater Management Agencies Association (BASMAA) Post Construction Manual

The BASMAA Post Construction Manual includes guidance for low impact development to implement the Phase II Small MS4 General Permit. It includes best management practices (BMPs) to avoid stormwater pollution.

Sonoma County Water Agency Draft Flood Design Manual

All of Sonoma County is under the jurisdiction of Sonoma County Water Agency (Sonoma Water), which is responsible for managing streams and flooding problems in the County. Sonoma Water published a Draft Flood Management Design Manual, which provides flood management guidelines and design guidelines for conveyance systems.

Sonoma Water Supply Strategic Action Plan

This plan outlines the development of new water supply projects, plans, and strategies to meet the reasonable expected future water demands. The County General Plan includes broad goals and policies aimed at protecting the County's water supply and water quality and protecting against flood hazards. Goals and policies from the County General Plan are provided below.

Sonoma County General Plan 2020

The Sonoma County General Plan 2020 (Sonoma County 2008, amended 2016) includes policies to guide decisions on future growth, development, and conservation of resources through 2020. The County General Plan includes broad goals and policies aimed at protecting the County's water supply and water quality and protecting against flood hazards. Goals and policies from the County General Plan are provided below.

Goal WR-1: Protect, restore, and enhance the quality of surface and groundwater resources to meet the needs of all reasonable beneficial uses.

Objective WR-1.2: Avoid pollution of stormwater, water bodies and groundwater.

Policy WR-1c: Prioritize stormwater management measures in coordination with the RWQCB direction, focusing first upon watershed areas that are urbanizing and watersheds with impaired water bodies. Work cooperatively with the RWQCBs to manage the quality and quantity of stormwater runoff from new development and redevelopment in order to:

(1) Prevent, to the maximum extent practicable, pollutants from reaching stormwater conveyance systems.

(2) Ensure, to the maximum extent practicable, that discharges from regulated municipal storm drains comply with water quality objectives.

(3) Limit, to the maximum extent practicable, stormwater from post development sites to pre-development quantities.

(4) Conserve and protect natural areas to the maximum extent practicable.

Policy WR-1g: Minimize deposition and discharge of sediment, debris, waste and other pollutants into surface runoff, drainage systems, surface water bodies, and groundwater.

Policy WR-1h: Require grading plans to include measures to avoid soil erosion and consider upgrading requirements as needed to avoid sedimentation in stormwater to the maximum extent practicable.

Policy WR-1q: Require new development projects to evaluate and consider naturally occurring and human caused contaminants in groundwater.

Goal WR-2: Manage groundwater as a valuable and limited shared resource.

Objective WR-2.3: Encourage new groundwater recharge opportunities and protect existing groundwater recharge areas.

Objective WR-2.5: Avoid additional land subsidence caused by groundwater extraction.

Policy WR-2e: Require proof of groundwater with a sufficient yield and quality to support proposed uses in Class 3 and 4 water areas.[3] Require test wells or the establishment of community water systems in Class 4 water areas. Test wells may be required in Class 3 areas. Deny discretionary applications in Class 3 and 4 areas unless a hydrogeologic report establishes that groundwater quality and quantity are adequate and will not be adversely impacted by the cumulative amount of development and uses allowed in the area, so that the proposed use will not cause or exacerbate an overdraft condition in a groundwater basin or subbasin. Procedures for proving adequate groundwater should consider groundwater overdraft, land subsidence, saltwater intrusion, and the expense of such study in relation to the water needs of the project.

Goal WR-4: Increase the role of conservation and safe, beneficial reuse in meeting water supply needs of both urban and rural users.

Objective WR-4.1: Increase the use of recycled water where it meets all applicable regulatory standards and is the appropriate quality and quantity for the intended use.

Objective WR-4.2: Promote and encourage the efficient use of water by all water users.

Objective WR-4.3: Conserve and recognize stormwater as a valuable resource.

Policy WR-4b: Use water effectively and reduce water demand by developing programs to:

(1) Increase water conserving design and equipment in new construction, including the use of design and technologies based on green building principles,

(2) Educate water users on water conserving landscaping and other conservation measures,

(3) Encourage retrofitting with water conserving devices,

(4) Design wastewater collection systems to minimize inflow and infiltration, and

(5) Reduce impervious surfaces to minimize runoff and increase groundwater recharge.

[3] Class 3 refers to a marginal groundwater area. Class 4 refers to low/highly variable water yield areas.

Policy WR-4e: Require water conserving plumbing and water conserving landscaping in all new development projects and require water conserving plumbing in all new dwellings. Promote programs to minimize water loss and waste by public water suppliers and their customers. Require County-operated water systems to minimize water loss and waste.

Policy WR-4g: Require that development and redevelopment projects, where feasible, retain stormwater for on-site use that offsets the use of other water.

Goal PS-2: Reduce existing flood hazards and prevent unnecessary exposure of people and property to risks of damage or injury from flood hazards.

Objective PS-2.2: Regulate new development to reduce the risks of damage and injury from known flooding hazards to acceptable levels.

Policy PS-2e: Expand the County's zero net fill requirements to address all areas of the Unincorporated County that are located within the 100-year FEMA special flood hazard area.

Policy PS-2f: Preserve floodplain storage capacity by avoiding fill in areas outside of the 100-year FEMA special flood hazard area that retain or could retain flood waters.

Policy PS-2m: Regulate development, water diversion, vegetation management, grading, and fills to minimize any increase in flooding and related damage to people and property.

Policy PS-2o: Costs for drainage facilities to handle the surface runoff from new development shall be the responsibility of the new development.

Policy PS-2p: Require that design and construction of drainage facilities be subject to the review and approval of the Permit and Resource Management Department.

Sonoma County Code

Flood Damage Prevention (Sonoma County Code Chapter 7B)

Chapter 7B of the Sonoma County Code requires permits be obtained prior to constructing residences in any area of special flood hazard, anchoring of new construction in areas of special flood hazard to prevent movement or collapse of a structure, the use of flood resistant materials and utility equipment in new construction, and elevation of the lowest residential floor to 12 inches above the base flood elevation.

Construction Grading and Drainage (Chapter 11)

Chapter 11 of the Sonoma County Code protects watercourses from construction practices that could result in pollutants entering the soil or watercourses through requiring best management practices be implemented and requiring construction grading permits and construction drainage permits.

Stormwater Quality (Chapter 11A)

Chapter 11A of the Sonoma County Code includes regulations to protect water quality, including prohibiting the discharge of non-stormwater into the County's stormwater system, compliance with NPDES permits for stormwater discharge, requiring measures to reduce and eliminate stormwater pollutants, and requiring the implementation of construction best management practices to prevent the discharge of contaminants.

Water Efficient Landscape Ordinance (Sonoma County Code Chapter 7D3)

The Sonoma County Water Efficient Landscape Ordinance, codified in Chapter 7D3 of the County Code, establishes requirements for the design, installation, and maintenance of landscaping associated with development projects in order to promote water conservation and reduce waste. The ordinance implements the State Water Conservation in Landscaping Act and applies to new and rehabilitated landscape projects associated with discretionary approvals, including residential, commercial, industrial, and public development requiring building or grading permits. Projects subject to the ordinance must undergo a landscape plan check demonstrating compliance with standards for water use efficiency, including preparation of landscape and irrigation plans, verification of installation, and final inspection.

Santa Rosa City Code

The Santa Rosa City Code is not applicable to the project. However, relevant chapters of the Santa Rosa City Code are described here for informational purposes. Chapter 17-12 establishes requirements for stormwater management, including managing stormwater drainage and stormwater quality. Section 17-12.010 requires a developer to obtain a permit prior to the alteration of stormwater flows or discharge of material into a stormwater drainage system. Section 17-12.170 requires construction contractors to implement best management practices to prevent the discharge of construction wastes or debris to the storm water system.

Chapter 19-64 includes requirements for grading and erosion control. These requirements include diverting runoff from steep slopes or other critical areas, trapping sediment-laden runoff in basins to allow soil particles to settle and retaining natural vegetation when feasible.

Santa Rosa General Plan 2050

While the County is not subject to the City's building and zoning laws, the County does intend, where appropriate and feasible, to work with the City to avoid land use conflicts. Accordingly, City of Santa Rosa regulations are provided for informational purposes.

The City of Santa Rosa General Plan sets forth the following guiding and implementing policies relevant to hydrology and water quality:

Goal 3-5: Protect, expand, maintain, and restore natural resources, open space, and the limited remaining agricultural land.

> **Policy 3-5.5:** Maintain, restore, and protect the city's waterways.
>
> **Policy 3-5.6:** Restore channelized waterways and avoid creating additional channelized waterways unless no other alternative is available to protect human health, safety, and welfare.
>
> **Policy 3-5.7:** Ensure that construction adjacent to creek channels is sensitive to the natural environment, preserves topography and vegetation along the creek, does not disrupt or pollute the waterway, and provides an adequate setback buffer.

Goal 3-6: Use nature- and science-based strategies to preserve and create environments that provide ecosystem benefits.

> **Policy 3-6.1:** Protect groundwater recharge areas, particularly creeks and riparian corridors.
>
> **Policy 3-6.3:** Focus green stormwater improvements in areas at risk of flooding with an emphasis on Equity Priority Areas in floodprone areas.

4.9.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The proposed project's impacts to hydrology and water quality are evaluated based on the proposed project's adherence to local, state, and federal regulations; the proposed project design; the proposed demolition and grading activities during construction; proposed operational activities; flood control requirements; and BMPs for control of surface runoff and reduction of pollutants in stormwater runoff.

Significance Thresholds

1. The following thresholds of significance are based on Appendix G to the *CEQA Guidelines*. For the purposes of this EIR, the proposed project may have a significant adverse impact if it would:
2. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
3. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
4. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    i. Result in a 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;
5. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
6. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HYD-1 THE PROPOSED PROJECT WOULD NOT VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUND WATER QUALITY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Office Site

Construction of the office site, including demolition of existing County buildings, would generate pollutants associated with demolition activities, including potentially asbestos and lead-based materials. These pollutants could be mobilized and transported off-site in stormwater runoff during precipitation events. In compliance with the State Water Resources Control Board (SWRCB) Construction Stormwater General Permit, the project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) that specifies BMPs to control pollutant discharge, including measures for asbestos and lead containment. As a BMP, demolition would also be scheduled during periods of low precipitation to further reduce runoff risk. Grading and excavation for the office building, Emergency Coordination Center, and associated parking areas would increase erosion potential and could result in sediment-laden runoff entering the County-maintained stormwater system within the office site, which ultimately discharges to the City of Santa Rosa's municipal stormwater system or Paulin Creek. Construction activities at the office site would disturb more than one acre and therefore require compliance with the General Permit, including erosion and sediment control BMPs and good housekeeping practices consistent with the SWRCB Construction Stormwater General Permit and applicable MS4 permit requirements implemented by the County of Sonoma. Excavation for utility connections along Administration Drive would typically extend 3 to 4 feet below ground surface; groundwater is anticipated at approximately 10 feet below ground surface and is unlikely to be encountered. If groundwater is encountered, dewatering would be conducted in accordance with the General Permit, including monitoring for pH and turbidity and ensuring discharges are free of pollutants. Additionally, grading activities would require approval of a grading permit from Sonoma County for on-site work, consistent with County grading regulations, with exemptions limited to qualifying work within the public right-of-way. Compliance with grading permit conditions would further ensure implementation of erosion control and drainage measures to protect water quality. Compliance with these requirements would minimize pollutant discharge and prevent violations of water quality standards. Therefore, construction of the office site would result in a less-than-significant impact on water quality.

Residential Site

Construction of the residential site, which would include up to 1,500 units and up to 20,000 square feet of retail/commercial space, would involve demolition of existing paved areas and grading for new building pads and infrastructure. Similar to the office site, demolition activities could generate pollutants such as asbestos and lead if any structures are present, and grading would increase erosion potential. Development would be required to comply with the SWRCB Construction Stormwater General Permit, including preparation of a SWPPP and implementation of BMPs to control pollutant discharge. The construction would require incorporation of erosion and sediment

control BMPs and good housekeeping practices consistent with the SWRCB Construction Stormwater General Permit and applicable MS4 permit requirements implemented by the County of Sonoma. Excavation for utility connections to existing water and sewer mains along Ventura Avenue would be required, and while groundwater is unlikely to be encountered, any dewatering activities would be subject to General Permit requirements for monitoring and pollutant-free discharge. Grading associated with the residential site would require a Sonoma County grading permit for work occurring outside the public right-of-way, while qualifying utility connections within the right-of-way may be exempt. Grading permit requirements would include implementation of erosion and sediment control measures to prevent off-site discharge and protect surface and groundwater quality. Additionally, future residential development would also be required to implement LID stormwater features such as bioretention areas, porous pavement, and detention basins consistent with the County's MS4 permit. With adherence to these regulatory requirements, construction of the residential site would not violate water quality standards or waste discharge requirements and would result in a less-than-significant impact.

Operation

Office Site

Stormwater runoff from the office site would be conveyed through internal roads and storm drain facilities maintained by Sonoma County General Services, with downstream discharge to the City of Santa Rosa municipal stormwater system subject to MS4 permit requirements. During operation of the office site, which includes the County office building, Emergency Coordination Center, and associated parking areas, potential water quality impacts could occur from routine activities such as oil leaks from vehicles, use of pesticides or fertilizers for landscape maintenance, leaching of metals from roofing and drainage systems, and litter. These pollutants could be mobilized and transported off-site in stormwater runoff during storm events. The office site would create and/or replace more than 10,000 square feet of impervious surface and therefore must comply with the North Coast MS4 Permit and associated Technical Manual. Compliance would be verified during final design review and approval by Permit Sonoma. Project design would incorporate LID measures, source control, and stormwater treatment features to address post-construction runoff, including hydromodification controls that capture 100 percent of runoff from a 1-inch, 24-hour storm event. Stormwater treatment features may include green roofs, tree boxes, vegetated planters, swales, porous pavement, and detention basins. Trash capture devices would also be installed consistent with MS4 requirements. Existing LID features in the south parking lot, installed under a previous offset agreement, would be evaluated for potential contribution to compliance. With implementation of these measures, operation of the office site would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, operational impacts would be less than significant.

Residential Site

Operation of the residential site, which would include up to 1,500 units and up to 20,000 square feet of retail/commercial space, would similarly generate potential pollutants in stormwater runoff, including oil and grease from vehicles, pesticides and fertilizers from landscaped areas, and metals from roofing and drainage systems. Because the residential site is analyzed at a programmatic level, specific design details are not available; however, future development would be required to comply with the North Coast MS4 Permit and Technical Manual. Compliance would include incorporation of LID site design features, source control measures, and stormwater treatment systems to address

post-construction runoff. Hydromodification controls would be required to capture runoff from a 1-inch, 24-hour storm event, and trash capture devices would be installed consistent with MS4 requirements. Program-level assumptions include implementation of green infrastructure such as bioretention areas, vegetated swales, porous pavement, and detention basins. With adherence to these regulatory requirements, operation of the residential site would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, operational impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact HYD-2 THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY DECREASE INFILTRATION RATES ON-SITE. THE PROPOSED PROJECT WOULD BE SUPPLIED WATER BY THE CITY OF SANTA ROSA IN ACCORDANCE WITH THE MANAGEMENT REQUIREMENTS OF THE SANTA ROSA VALLEY – SANTA ROSA PLAIN SUBBASIN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Office Site

The office site would be constructed on a portion of the County Administration Center that is already developed with impervious surfaces, including buildings and parking areas. While the project would replace existing structures with new office facilities and associated parking, the overall impervious footprint on the office site would remain similar to existing conditions. Therefore, the office site would not substantially decrease infiltration rates or interfere with groundwater recharge. In addition, project design would incorporate LID measures consistent with the North Coast MS4 Permit and the City of Santa Rosa LID Technical Manual, including permeable pavement, bioretention areas, and landscaped infiltration zones, which would further promote on-site infiltration. Operation of the office site would not require groundwater extraction; water demand would be met by the City of Santa Rosa's municipal water system, which manages supplies in accordance with the Santa Rosa Valley – Santa Rosa Plain Subbasin Groundwater Sustainability Plan. Existing City conservation requirements during drought periods would further reduce potential for overdraft, including the County's Water Efficient Landscape Ordinance (WELO). Landscaping associated with the office site would be required to comply with WELO, as implemented by the County . WELO establishes maximum applied water allowances, efficient irrigation design standards, and landscape water budgeting requirements that substantially reduce outdoor water use. Compliance with WELO would further limit potable water demand associated with landscaped areas and avoid substantial increases in water use that could otherwise affect groundwater resources. Compliance with these regulatory requirements would ensure that the office site does not impede sustainable groundwater management. Therefore, impacts related to groundwater supply and recharge would be less than significant.

Residential Site

The residential site would introduce up to 1,500 units and up to 20,000 square feet of retail/commercial space, resulting in an increase in impervious surfaces compared to existing conditions on the east side of Ventura Avenue. This increase could reduce infiltration rates; however, the site is already partially developed with paved areas, and residential development would be required to implement LID measures consistent with the North Coast MS4 Permit. These measures would include permeable pavement, drainage to landscaped areas, bioretention features, and rooftop runoff collection systems, which would minimize reductions in groundwater recharge. Operation of the residential site would not involve groundwater extraction; water demand would be supplied by the City of Santa Rosa's municipal system, which sources water in part from the Santa Rosa Plain Subbasin under a sustainable groundwater management framework. Existing City conservation requirements during drought periods would further reduce potential for overdraft, including WELO. Landscaping associated with the residential site would be required to comply with WELO, as implemented by the County of Sonoma. WELO establishes maximum applied water allowances, efficient irrigation design standards, and landscape water budgeting requirements that substantially reduce outdoor water use. Compliance with WELO would further limit potable water demand associated with landscaped areas and avoid substantial increases in water use that could otherwise affect groundwater resources.

Existing City conservation requirements during drought periods would further reduce potential for overdraft. Therefore, the residential site would not substantially decrease groundwater supplies or interfere with groundwater recharge, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Impact HYD-3 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Office Site

Construction of the office site would involve grading and excavation for the new office building, Emergency Coordination Center, and associated parking areas. These activities could temporarily alter drainage patterns and increase the potential for erosion and sedimentation on-site. However, construction would be subject to the State Water Resources Control Board Construction

Stormwater General Permit, which requires preparation and implementation of a SWPPP and BMPs to control erosion and sediment discharge. The Sonoma County Construction Grading and Drainage Ordinance would further ensure that grading and drainage activities are properly managed. These requirements would be reviewed and enforced by the County under its MS4 Permit and City of Santa Rosa LID Technical Manual. With implementation of these measures, construction of the office site would not result in substantial erosion or siltation on- or off-site. Therefore, impacts would be less than significant.

Residential Site

Construction of the residential site would involve large-scale grading for building pads, internal roadways, and utility infrastructure, which could temporarily alter drainage patterns and increase erosion potential. Future development would be required to comply with the Construction Stormwater General Permit, including preparation of a SWPPP and implementation of erosion and sediment control BMPs. Compliance with the Sonoma County Construction Grading and Drainage Ordinance and the County's MS4 Permit the City of Santa Rosa LID Technical Manual would also be required. These measures would minimize erosion and sedimentation during construction. Therefore, impacts related to alteration of drainage patterns during residential construction would be less than significant.

Operation

Office Site

Operation of the office site would not substantially alter the existing drainage pattern on the portion of the project site that is already developed with County facilities. The existing drainage system consists primarily of impervious surfaces with runoff directed to storm drains, and this pattern would remain similar following project implementation. As discussed in Impact HYD-1, project design would be required to implement BMPs and LID measures in accordance with the County's MS4 Permit and City of Santa Rosa LID Technical Manual which would reduce the potential for erosion and siltation during operation. These measures include minimizing impervious surfaces, conserving natural areas where feasible, protecting slopes and channels from erosion, and complying with stream setback ordinances. Additional features such as bioretention areas, vegetated swales, and permeable pavement would further reduce runoff velocity and promote infiltration. With implementation of these measures, operation of the office site would not result in substantial erosion or siltation on- or off-site. Therefore, operational impacts would be less than significant.

Residential Site

Operation of the residential site would introduce additional impervious surfaces compared to existing conditions, which could alter drainage patterns and increase runoff. However, future development of the residential site would be required to implement LID measures and BMPs consistent with the County's MS4 Permit and City of Santa Rosa LID Technical Manual. These measures would include minimizing impervious surfaces, conserving natural areas where feasible, protecting slopes and channels from erosion, and complying with stream setback ordinances. Program-level assumptions also include incorporation of green infrastructure features such as bioretention areas, vegetated swales, and permeable pavement to manage runoff and reduce erosion potential. With adherence to these requirements, operation of the residential site would

not substantially alter drainage patterns in a manner that would result in erosion or siltation on- or off-site. Therefore, operational impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant.

Threshold 4:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Impact HYD-4 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE IN A MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF-SITE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Office Site

Construction of the office site would involve grading and excavation for the new office building, Emergency Coordination Center, and associated parking areas. These activities could temporarily alter on-site drainage patterns; however, construction would not include channelization of Paulin Creek or relocation of any natural drainage features. Compliance with the State Water Resources Control Board Construction Stormwater General Permit, including preparation and implementation of a SWPPP, would ensure that construction BMPs are implemented to control and direct surface runoff on-site. These measures would minimize the potential for increased runoff that could result in flooding on- or off-site. Therefore, construction of the office site would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding. Impacts would be less than significant.

Residential Site

Construction of the residential site would involve large-scale grading for building pads, internal roadways, and utilities, which could temporarily alter drainage patterns and increase runoff. However, future development of the residential site would be required to comply with the Construction Stormwater General Permit, including preparation of a SWPPP and implementation of BMPs to manage runoff during construction. No alteration of Paulin Creek or relocation of natural drainage features would occur. These measures would ensure that construction does not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, construction impacts for the residential site would be less than significant.

Operation

Office Site

Operation of the office site would not substantially alter existing drainage patterns because the site would already be developed with impervious surfaces and stormwater infrastructure. While the project would replace existing buildings and parking areas, the overall drainage pattern would remain similar to existing conditions. Project design would comply with hydromodification requirements of the County's MS4 Permit and City of Santa Rosa LID Technical Manual, which require capturing 100 percent of runoff from a 1-inch, 24-hour storm event. LID features such as bioretention areas, vegetated swales, and permeable pavement would be incorporated to manage runoff and prevent flooding. Therefore, operation of the office site would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Impacts would be less than significant.

Residential Site

Operation of the residential site would increase impervious surfaces compared to existing conditions, which could increase runoff. However, future residential development would be required to comply with hydromodification requirements of the County's MS4 Permit and City of Santa Rosa LID Technical Manual, including capturing runoff from a 1-inch, 24-hour storm event and implementing LID measures such as bioretention areas, vegetated swales, and permeable pavement. These measures would ensure that post-construction drainage patterns do not result in flooding on- or off-site. Therefore, operational impacts for the residential site would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 5:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Impact HYD-5 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE IN A MANNER WHICH WOULD EXCEED THE CAPACITY OF STORMWATER DRAINAGE SYSTEMS OR PROVIDE ADDITIONAL SOURCES OF POLLUTED RUNOFF. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Office Site

Construction of the office site would involve grading and excavation for the new office building, Emergency Coordination Center, and associated parking areas. These activities could temporarily

alter drainage patterns and generate runoff; however, construction would not include channelization of Paulin Creek or relocation of any natural drainage features. Compliance with the State Water Resources Control Board Construction Stormwater General Permit, including preparation and implementation of a SWPPP, would ensure that BMPs are implemented to control and direct stormwater runoff on-site. These measures would minimize the potential for runoff to exceed the capacity of the city's stormwater drainage system or contribute substantial additional sources of polluted runoff. Therefore, construction impacts for the office site would be less than significant.

Residential Site

Construction of the residential site would involve large-scale grading for building pads, internal roadways, and utilities, which could temporarily increase runoff and pollutant loads. However, future development of the residential site would be required to comply with the Construction Stormwater General Permit, including preparation of a SWPPP and implementation of BMPs to manage runoff and minimize pollutant discharge. These measures would ensure that construction does not exceed the capacity of the city's stormwater drainage system or provide substantial additional sources of polluted runoff. Therefore, construction impacts for the residential site would be less than significant.

Operation

Office Site

Operation of the office site would not substantially alter existing drainage patterns because the site is already developed with impervious surfaces and stormwater infrastructure. While the project would replace existing buildings and parking areas, the overall drainage pattern would remain similar to existing conditions. Project design would comply with hydromodification requirements of the County's MS4 Permit and City of Santa Rosa LID Technical Manual, which require capturing 100 percent of runoff from a 1-inch, 24-hour storm event. LID features such as bioretention areas, green roofs, porous pavement, and detention basins would be incorporated, as applicable, to manage runoff and prevent overloading the city's stormwater system. In addition, stormwater treatment measures would minimize pollutant discharge. Therefore, operation of the office site would not exceed the capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

Residential Site

Operation of the residential site would increase impervious surfaces compared to existing conditions, which could increase runoff and pollutant loads. However, future development of the residential site would be required to comply with hydromodification requirements of the County's MS4 Permit and the City of Santa Rosa LID Technical Manual, including capturing runoff from a 1-inch, 24-hour storm event and implementing LID measures, as applicable, such as bioretention areas, vegetated swales, porous pavement, and detention basins. These measures would ensure that post-construction runoff does not exceed the capacity of the city's stormwater drainage system and that pollutant discharge is minimized. Therefore, operational impacts for the residential site would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 6:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Impact HYD-6 THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOW. NO IMPACT WOULD OCCUR.

Overall Project (Office and Residential Sites)

The project site is located within Zone X, which is an area located outside of a flood hazard zone and is not subject to flood flows (FEMA 2025). Therefore, the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

There would be no impact.

Threshold 7:	In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impact HYD-7 THE PROPOSED PROJECT WOULD NOT RISK THE RELEASE OF POLLUTANTS DUE TO PROJECT INUNDATION IN FLOOD HAZARD, TSUNAMI, OR SEICHE ZONES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

The project site is not located within a flood hazard zone, tsunami inundation zone, or seiche inundation zone. Therefore, the project would not have the potential to be subject to inundation in these zones.

The project site is 0.8 miles from the Piner Creek dam and is within the inundation zone of the Piner Creek dam (DWR 2025c). However, the potential for dam failure is low as all dams are constructed to the specifications set forth by DWR Division of Safety of Dams. DWR inspects dams on an annual basis to identify issues and ensure the continued safety of a dam's operation. The proposed project does not include any features which would preclude the routine inspection of dams or otherwise increase the risk of dam failure and inundation. Because the likelihood of catastrophic dam failure is

low, impacts related to the release of pollutants due to dam inundation would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 8:	Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-8 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

Water Quality Control Plan

The Basin Plan, adopted by the North Coast RWQCB, is the water quality control plan applicable to the project site. The Basin Plan defines beneficial uses, sets forth water quality objectives, and establishes programs to manage the quality of surface water and groundwater and achieve those water quality objectives for protection of beneficial uses. As described in Impact HYD-1, construction and operation of the proposed project would be conducted in compliance with applicable regulatory requirements related to stormwater runoff to minimize the potential for pollutants to degrade water quality. These include the Construction Stormwater General Permit, the County's MS4 Permit and City of Santa Rosa LID Technical Manual. In accordance with these permits the proposed project would be required to implement a SWPPP, construction BMPs, Source Control BMPs, and LID BMPs to reduce the potential for the proposed project to degrade water quality. With adherence to these regulatory requirements, the proposed project would not conflict with the water quality objectives of the Basin Plan, and this impact would be less than significant.

Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin

The project site overlies the Santa Rosa Plain Subbasin, which is designated as a medium-priority basin by DWR pursuant to SGMA, and the Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin, adopted by the Santa Rosa Plain Groundwater Sustainability Agency, provides a framework for the management of the basin. As discussed in Impact HYD-2, project design would be required to implement BMPs and LID measures in accordance with the County's MS4 Permit and City of Santa Rosa LID Technical Manual which would ensure the proposed project would not substantially interfere with groundwater recharge. In addition, the proposed project's water demand would be met by City of Santa Rosa supplies which, in accordance with the Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin, implements water conservation during times of drought to minimize the potential to overdraft. Therefore, the proposed project would not conflict with implementation of the Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin and this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.9.4 Cumulative Impacts

Cumulative impacts for hydrology and geology consider city-wide impacts that would occur from reasonably anticipated projects identified in Table 3-1 of Section 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this EIR is discussed in Section 3, *Environmental Setting*.

Water Quality, Drainage, and Sedimentation

Cumulative development in the City of Santa Rosa would increase impervious surfaces, redirect the drainage of surface flow during storm events, and increase pollutant loading, peak flows, erosion, sedimentation, and flooding. For the cumulative analysis related to hydrology and water quality, cumulative projects being considered include the projects discharging to the same watershed as the proposed project (i.e., Mark West Creek watershed). Cumulative projects such as listed in Table 3-1 of Section 3, *Environmental Setting*, could potentially increase impervious surfaces throughout the region, redirect stormwater runoff during storm events, increase the peak flow of stormwater runoff, and contribute to pollutant loading in stormwater runoff reaching both the storm drain system and creeks and waterways within the Mark West Creek watershed. However, all of the cumulative projects, including the proposed project, would be required to comply with NPDES and local water quality requirements and drainage standards. All of the cumulative projects that disturb one acre or more of soil must comply with the requirements of the Construction Stormwater General Permit and City of Santa Rosa Municipal Code. Additionally, each project that creates and/or replaces 10,000 square feet or more of impervious surface area would be required to comply with the MS4 Permit. Implementation of a SWPPP or erosion and sediment control plans (for construction) and erosion control and LID BMPs (for operation) would be required for each cumulative project to minimize water quality impacts. The design of each project would be subject to city review and approval of project design to verify the appropriate drainage improvements and BMPs would be implemented to manage surface flows and reduce off-site stormwater discharge. Compliance with the Construction Stormwater General Permit, the County's MS4 Permit, and the City of Santa Rosa LID Technical Manual requirements would require each individual project to incorporate BMPs and other drainage facilities designed to address drainage and surface water quality protection. As a result, cumulative impacts to water quality, drainage, flooding, and sedimentation would be less than significant.

Groundwater

Cumulative projects that are provided water by the City of Santa Rosa would increase water demand from the city which may, in part, be met by groundwater sourced from the Santa Rosa Plain Subbasin. Cumulative increases in impervious surface areas above the basin could affect groundwater recharge. Each cumulative project would be reviewed by the City to verify infiltration BMPs are incorporated into project design, where infiltration is feasible. In addition, the City would review cumulative projects to confirm adequate water supplies are available such that water

supplied from groundwater sources would not substantially decrease groundwater supplies. The Santa Rosa Plain Groundwater Sustainability Agency is responsible for ensuring the basin is sustainably managed in accordance with the SGMA, which would minimize the potential for water supplied to cumulative development from groundwater to substantially decrease groundwater supplies. Therefore, cumulative impacts to groundwater resources would be less than significant.

Flooding

The project site is not located within a flood hazard zone, tsunami zone, or seiche zone and therefore these are not discussed herein. The cumulative study area for flooding and inundation is the inundation zone of the Piner Creek dam. No cumulative projects listed in Table 3-1 of Section 3, *Environmental Setting*, are located in the inundation zone of the Piner Creek dam. No cumulative projects involve activities at the Piner Creek dam or include any features which would preclude the routine inspection of dams or otherwise increase the risk of dam failure and inundation. Accordingly, cumulative development would not increase the risk of inundation due to failure of the Piner Creek dam. Cumulative impacts related to flooding would be less than significant.

4.10 Land Use and Planning

This section identifies and evaluates issues related to land use and planning in the context of the proposed project. The section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to land use and planning; and potential impacts related to land use and planning that would result from implementation of the proposed project.

4.10.1 Setting

a. Project Site and Surrounding Land Uses

Project Site

Existing land uses within the project site include the Sonoma County Administration Center (CAC) which is used for governmental and administrative functions. It is currently developed with five low-rise County-used government office buildings and surface parking. Under California Government Code Sections 53090 and 53091, cities and counties are exempt from complying with each other's building codes, general plans and zoning ordinances.[1] As such, even though the County-owned property is located within the City of Santa Rosa, the City's General Plan and zoning ordinances do not apply to the project site.[2] The project site has no land use designation under the County's General Plan.

The office site and Residential site have a City of Santa Rosa General Plan land use designation of Public/Institutional and is zoned Public and Institutional (PI). Sites with land use designations of Public/Institutional are areas or clusters of governmental or semi-public facilities.

Areas Surrounding Project Site

Land uses immediately surrounding the project site include County administrative and public services facilities, surface parking areas, and internal circulation roads. To the north, adjacent to Fiscal Drive, are additional County and utility-related facilities, including the Central Mechanical Plant. Also to the north along Ventura Avenue are a number of apartment complexes, residential uses, and a bank. To the west, across Administration Drive, are the Superior Court of California and Santa Rosa Municipal Court buildings, as well as access toward Highway 101, which forms a major regional transportation corridor. To the east, along Mendocino Avenue, are commercial uses and public-serving facilities, including the Family Justice Center, as well as a mix of residential and commercial development along the corridor. To the south, across Administration Drive and in the vicinity of Steele Lane,, are a combination of commercial uses and nearby single-family residential development. In the broader vicinity, additional County-operated facilities include the Hall of Justice, Sheriff's Office, Main Adult Detention Facility, and related support uses. Highway 101 is immediately west of the project site. Beyond that, to the west, the land is primarily zoned as Commercial Office and General Commercial. Zoning north and east of the project site is similarly mixed, while zoning south of the project site is primarily Residential. The areas to the north and west of the project site have primarily Office land use designations, with some Medium Density Residential to the north and Retail and Business Services land use designations to the west. Areas to

[1] See also 40 Ops.Cal. Atty.Gen. 243 (1962)
[2] *Lawler v. City of Redding* (1992) 7 Cal.App.4th 778

the east have primarily Retail and Business Services and Retail/Medium Residential Mixed land use designations. Areas to the south of the project site have a mix of Low Density Residential and Office land use designations.

4.10.2 Regulatory Setting

a. Federal Regulations

No existing federal plans, policies, regulations, or laws related to land use and planning are applicable to the proposed project.

b. State Regulations

No existing state plans, policies, regulations, or laws related to land use and planning are applicable to the proposed project. Federal, state, and local regulations that are applicable to the project in the context of environmental protection and environmental impacts are discussed in relevant sections of this EIR. For example, the Clean Water Act is discussed in Section 4.9, *Hydrology and Water Quality*, of this EIR.

c. Regional and Local Regulations

Bay Area Air Quality Management District 2017 Clean Air Plan

The Bay Area Air Quality Management District (now called the Bay Area Air District, or Air District) is responsible for assuring that the federal and State ambient air quality standards are attained and maintained in the Bay Area. The Air District is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, as well as many other activities.

The Air District adopted the 2017 Clean Air Plan (2017 Plan) as an update to the 2010 Clean Air Plan in April 2017. The 2017 Plan provides a regional strategy to protect public health and the climate. Consistent with the GHG reduction targets adopted by the state, the 2017 Plan lays the groundwork for a long-term effort to reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050 (Air District 2017). To fulfill state ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors—reactive organic gases, nitric oxide, and nitrogen dioxide—and reduce transport of ozone and its precursors to neighboring air basins. The 2017 Plan builds upon and enhances the Air District's efforts to reduce emissions of fine particulate matter TACs (Air District 2017).

Association of Bay Area Governments 2021 Regional Transportation Plan/Sustainable Communities Strategy

The Association of Bay Area Governments (ABAG) is required by State and federal law to prepare, update, and adopt a Regional Transportation Plan (RTP) every four years. Senate Bill (SB) 375, California's Sustainable Communities and Climate Protection Act, was enacted in 2008, requiring all RTPs to include an SCS that reduces greenhouse gas emissions from passenger vehicles and light-duty trucks. The most recent update to the RTP/SCS was completed by ABAG and the Metropolitan Transportation Commission in October 2021. The 2021 RTP/SCS, also known as Plan Bay Area 2050,

builds on ABAG's 2017 RTP/SCS and serves as the blueprint for the region's transportation system over the next 30 years (ABAG 2021).

The 2021 RTP/SCS includes the following goals:

- Protect and preserve affordable housing.
- Spur housing production for residents of all income levels.
- Create inclusive communities.
- Improve economic mobility.
- Shift the location of jobs.
- Maintain and optimize the existing transportation system.
- Create healthy and safe streets.
- Build a next-generation transit network.
- Reduce risks from hazards.
- Expand access to parks and open space.
- Reduce climate emissions.

City of Santa Rosa Municipal Code

As mentioned in the previous section, under California Government Code Sections 53090 and 53091, cities and counties are exempt from complying with each other's building codes, general plans and zoning ordinances. As such, even though the County-owned property is located within the City of Santa Rosa, the City's zoning ordinance, General Plan and building codes do not apply to the project site. For informational purposes, the City has zoned the project site as Public and Institutional (PI). PI zoning permits uses such as public facilities, utilities, and hospitals.

City of Santa Rosa General Plan

As mentioned in the previous section, under California Government Code Sections 53090 and 53091, cities and counties are exempt from complying with each other's General Plan. As such, even though the County-owned property is located within the City of Santa Rosa, the City's General Plan does not apply to the project site. For informational purposes, the project site has a land use designation of Public/Institutional in the City's General Plan. Sites with land use designations of Public/Institutional are areas or clusters of governmental or semi-public facilities. According to the City General Plan, new facilities may be appropriate in any land use category based on need and subject to environmental review.

Sonoma County 2023-2031 Housing Element

The Sonoma County 2023 Housing Element Update establishes the County's strategy for meeting housing needs between 2023 and 2031, with a focus on increasing housing supply, affordability, and equity. It identifies a need for 3,824 housing units across income levels and includes goals to promote infill development, preserve existing affordable housing, and expand housing for special needs populations (Sonoma County 2023). As part of its strategy to address its Regional Housing Needs Allocation (RHNA) shortfall, the Housing Element included Program 4c, which identifies the County Administrative Center campus as a site capable of accommodating up to 200 new housing units, including at least 180 units affordable to lower-income households. These units would be developed through a County-led RFP process on County-owned land, with entitlements and

permitting administered by the County pursuant to its sovereign immunity from local zoning regulations. The proposed project would advance this Housing Element strategy by introducing new on-site housing consistent with the County's long-term housing objectives.

Sonoma County General Plan 2020

The Sonoma County General Plan 2020 Land Use Element was adopted by Sonoma County in 2008 and amended in 2024, includes policies to guide decisions on future growth, development, and conservation of resources. The Land Use Element aims to guide the distribution, location, and extent of land uses to ensure that development aligns with community objectives and legal standards. The Sonoma County General Plan Land Use Element contains the following goals and objectives related to land use:

Goal LU-1: Accommodate Sonoma County's fair share of future growth in the San Francisco Bay Area region as shown on Tables LU-2 and LU-5 in a manner consistent with environmental constraints, maintenance of the high quality of life enjoyed by existing residents, and the capacities of public facilities and services. Achieve a desirable balance between job opportunities and population growth.

Goal LU-2: Accommodate the major share of future growth within the nine existing cities and their expansion areas and within selected unincorporated communities, which are planned to have adequate water and sewer capacities.

> **Policy LU-2c:** Encourage the retention and production of diverse types of housing within Urban Service Areas in order to provide adequate housing choices for current and future residents.

Goal LU-3: Locate future growth within the cities and unincorporated Urban Service Areas in a compact manner using vacant "infill" parcels and lands next to existing development at the edge of these areas.

> **Policy LU-3b:** In designated Urban Service Areas, maintain a residential holding capacity that is as close as possible to projected growth. Consider denial of Land Use Map amendments that add residential density if residential holding capacity exceeds projected growth, recognizing that future development may not use 100% of the capacity of all parcels.
>
> **Policy LU-3c:** Avoid urban sprawl by limiting extension of sewer or water services outside of designated Urban Service Areas pursuant to the policies of the Public Facilities and Services Element.

Goal LU-4: Maintain adequate public services in both rural and Urban Service Areas to accommodate projected growth. Authorize additional development only when it is clear that a funding plan or mechanism is in place to provide needed services in a timely manner.

> **Policy LU-4a:** If necessary, use zoning to assure that development shall occur only if public services are adequate or improvements are made to maintain an acceptable level of service. One such method could involve the use of "dual zoning" which would specify zoning with services and zoning without services.
>
> **Policy LU-4f:** Assure that new development contributes its fair share toward provision of the public services and infrastructure needed for projected growth.

Goal LU-6: Diversify new residential development types and densities. Include a range of urban densities and housing types in some unincorporated communities, and lower density in rural communities. In rural areas, housing types and densities should meet the needs of agricultural and resource users and provide limited residential development on large parcels.

> **Policy LU-6i:** Provide expanded opportunities for a mix of residential and commercial or industrial use in Urban Service Areas.

Goal LU-11: Promote a sustainable future where residents can enjoy a high quality of life for the long term, including a clean and beautiful environment and a balance of employment, housing, infrastructure, and services.

> **Policy LU-16a:** Require full urban improvement standards and services for discretionary commercial, industrial and urban residential projects within the Urban Service Boundary.
>
> **Policy LU-16b:** Consider requiring joint city/county design review for projects within the Santa Rosa Urban Service Boundary.

4.10.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

Based on Appendix G of the CEQA Guidelines, with a minor clarification, a project may be deemed to have a significant impact on land use and planning if it would:

1. Physically divide an established community; and/or
2. Cause a significant environmental impact due to a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Methodology

The General Plan consistency analysis under Impact LU-2, below, describes existing regional and local plans and policies and is intended to fulfill the requirements of CEQA Guidelines Section 15125(d). The emphasis of the analysis is on plan inconsistency and potential conflicts between the project and existing applicable land use plans, and whether any inconsistencies are significant environmental effects. The project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the applicable plans and does not conflict with any directly applicable policies. A given project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation. Pursuant to CEQA Guidelines Sections 15125(d), inconsistencies must be discussed. However, courts have also acknowledged that general and specific plans attempt to balance a range of competing interests, and that it is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan. For example, in San Francisco Tomorrow v. City and County of San Francisco (2014) 229 Cal.App.4th 498, the Court upheld the City's approval of a project despite inconsistency with general plan policies. The Court of Appeal gave deference to the local agencies and upheld that a project need not align in perfect conformity with every policy if the agency's consistency determination is reasonable and if the proposed project will overall be compatible with stated goals and programs specified in applicable plans. Additionally, in reaching such consistency conclusions, the County may also

consider the consequences of denial of a project, which can also result in other policy inconsistencies. For example, Government Code Section 65589.5 explains that the potential consequences of limiting the approval of housing are reduced mobility, urban sprawl, excessive commuting, and air quality deterioration.

For an impact to be considered significant, any inconsistency would also have to result in a significant adverse change in the environment not already addressed in the other resource chapters of this EIR. The analysis below provides a brief overview of the most relevant policies from the various planning documents. However, the County's consistency conclusions are based upon the planning documents as a whole.

b. Impact Analysis

Threshold 1:	Would the project physically divide an established community?

Impact LU-1 **THE PROPOSED PROJECT WOULD REDEVELOP EXISTING PUBLIC LAND AND WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY. THERE WOULD BE NO IMPACT.**

Office Site

The office site would redevelop existing County office buildings and surface parking areas within the CAC campus. People can generally cross through the project site either by vehicle on internal circulation roads or by bicycle and walking on sidewalks and lawns. However, Highway 101 is immediately west of the project site and is a natural barrier to movement between communities on either side of the highway.

The proposed project would maintain public movement through the project site. The proposed project would include pedestrian sidewalks in and around the new office building and surface parking lots. Sidewalks would be maintained along Mendocino Avenue and Administration Drive, allowing people to move around the site. No part of the office site would introduce new barriers such as highways that could divide a community. Therefore, the office site would not physically divide an established community. No impact would occur.

Residential Site

The residential site would add housing and supporting retail/commercial uses within the CAC campus, adjacent to the office portion of the project. This site of the project would include pedestrian connections linking residential areas to office buildings and surrounding sidewalks. These improvements would maintain and enhance internal connectivity.

The residential and retail/commercial uses would not introduce new physical barriers or alter existing circulation patterns. Highway 101 would remain the only major barrier in the area, and the project does not change its configuration. Therefore, the residential site would not physically divide an established community. No impact would occur.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

There would be no impact.

Threshold 2:	Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact LU-2 THE PROJECT WOULD NOT RESULT IN A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH AN APPLICABLE PLAN ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

Several regionally and locally adopted land use plans, policies, and regulations apply to the proposed project, including Plan Bay Area 2050 (ABAG 2021), and the Sonoma County General Plan. Project consistency with the 2017 Clean Air Plan is discussed in Section 4.2, Air Quality. Project consistency with other applicable plans are discussed below.

CONSISTENCY WITH PLAN BAY AREA 2050

As shown in Table 4.10-1, the project would be consistent with the key policies of Plan Bay Area 2050. Therefore, the project would not conflict with Plan Bay Area 2050 and impacts would be less than significant.

Table 4.10-1 Project Consistency with the Plan Bay Area 2050

Plan Bay Area Goals	Project Consistency
Environmental Strategies	
EN4. Maintain urban growth boundaries. Using urban growth boundaries and other existing environmental protections, focus new development within the existing urban footprint or areas otherwise suitable for growth, as established by local jurisdictions.	**Consistent.** The project site is within an existing urbanized area that is suitable for growth.
EN7. Expand commute trip reduction programs at major employers. Set a sustainable commute target for major employers as part of an expanded Bay Area Commuter Benefits Program, with employers responsible for funding incentives and disincentives to shift auto commuters to any combination of telecommuting, transit, walking and/or bicycling.	**Consistent.** The project would expand the CAC and develop residential units available to County employees and low-income households. By providing housing for County employees within the same area that they work, commute trips would be substantially reduced for County employees living at the Residential site.
EN 8. Expand clean vehicle initiatives. Expand investments in clean vehicles, including more fuel-efficient vehicles and electric vehicle subsidies and chargers.	**Consistent.** The project would involve implementation of a solar microgrid to support EV-charging at the covered parking lot, which would support the investment in clean vehicles for those living and working at the CAC.
Housing Strategies	
H3. Allow a greater mix of housing densities and types in Growth Geographies. Allow a variety of housing types at a range of densities to be built in Priority Development Areas, select Transit-Rich Areas and select High-Resource Areas.	**Consistent.** The project would involve the development of 1,500 residential units in an area proximate to resources such as public transit, services, schools, and community-serving retail and/or commercial establishments. A portion of the housing units would be reserved for low-income households, facilitating development of a mix of housing types and densities.

Plan Bay Area Goals	Project Consistency
H4. Build adequate affordable housing to ensure homes for all. Construct enough deed-restricted affordable homes to fill the existing gap for the unhoused community and to meet the needs of low-income households.	**Consistent.** The project would involve the development of affordable housing, supporting the County's Housing Element Program 4c, which identifies the CAC campus as a site capable of accommodating at least 180 lower-income units. The project also supports the County's RHNA by providing housing targeted to lower-income households.
H8. Accelerate reuse of public and community-owned land for mixed-income housing and essential services. Help public agencies, community land trusts and other non-profit landowners accelerate the development of mixed-income affordable housing.	**Consistent.** The project would facilitate the development of residential units and expand the County's public facilities and government offices, facilitating the development of mixed-income affordable housing and essential services.

CONSISTENCY WITH THE CITY OF SANTA ROSA MUNICIPAL CODE AND GENERAL PLAN

As discussed in Chapter 2, *Project Description*, and Section 4.10.1, *Setting*, of this EIR, the project site is under the County's jurisdiction. The County is not subject to the City's General Plan, or the City's building and zoning ordinances. As such, even though the County-owned property is located within the City of Santa Rosa, the City's General Plan and zoning ordinances do not apply to the project site. Accordingly, the project would not conflict with the City's General Plan and Municipal Code as these are inapplicable to the project. As discussed in Chapter 2, *Project Description*, the County does intend, where appropriate and feasible, to work with the City to avoid land use conflicts.

SONOMA COUNTY 2023-2031 6TH CYCLE HOUSING ELEMENT

The proposed redevelopment of the CAC site directly supports Program 4c of the Housing Element, which designates the CAC for 200 housing units and aligns with broader goals to increase urban housing opportunities and meet regional housing obligations (Sonoma County 2023). Although the project proposes the development of up to 1,500 residential units, and Program 4c discusses accommodating the development of 200 housing units, this inconsistency with Program 4c would not result in substantial impacts. Further, as discussed above in 4.1.3.a., Methodology, inconsistencies with specific policies does not preclude project approval, if the proposed project will be compatible with the objectives specified in the applicable plan. Given that the project proposes to introduce affordable housing in a resource-rich area, it does not conflict with the goals of Housing Element Program 4c. Project buildout associated with the proposed redevelopment are discussed further in Section 4.16.3, *Effects Found Not to be Significant*, of this EIR. As such, the project would be consistent with the Sonoma County Housing Element Update.

CONSISTENCY WITH THE 2020 SONOMA COUNTY GENERAL PLAN

As shown in Table 4.10-2, below, the proposed project would be consistent with the key goals and strategies of the 2020 Sonoma County General Plan Land Use Element (Sonoma County 2024). As discussed within the General Plan Consistency Determination memo prepared by Permit Sonoma in February 2026, the project supports General Plan policies that prioritize growth within urbanized areas, encourage infill development, and promote a mix of uses that reduce the distance between housing and employment. In addition, the project would provide a substantial amount of new housing, including a high proportion of affordable units, in alignment with Housing Element Program 4c and policies supporting diverse housing opportunities. By combining civic, employment, and residential uses on an existing developed site, the project advances compact development patterns

and improves access to services and transit. Therefore, the project would not conflict with the General Plan and impacts would be less than significant.

Table 4.10-2 Project Consistency with the 2020 Sonoma County General Plan

General Plan Goals	Project Consistency
Goal LU-1: Accommodate Sonoma County's fair share of future growth in the San Francisco Bay Area region as shown on Tables LU-2 and LU-5 in a manner consistent with environmental constraints, maintenance of the high quality of life enjoyed by existing residents, and the capacities of public facilities and services. Achieve a desirable balance between job opportunities and population growth.	
Objective LU-1.1: Correlate development authorized by the Land Use Plan with projected population and employment growth as shown on Tables LU-2 and LU-5. Provide an adequate but not excessive supply of residential, commercial and industrial lands to accommodate this projected growth, taking into account projected city annexations. **Objective LU-1.3:** Designate lands within the various land use categories to make available residential and employment opportunities and to achieve a balance between job opportunities and population growth countywide, subject to any constraints of environmental suitability, protection of agriculture and other resource protection, and availability of public services. **Policy LU-1g**: If necessary, use zoning to regulate the timing of development to assure a desirable balance between jobs and population. Zoning may authorize a lower development potential than that allowed by the Land Use Maps.	**Consistent.** The project provides a substantial number of residential units and new employment space within an existing urbanized area, consistent with projected growth and regional housing needs.
Goal LU-3: Locate future growth within the cities and unincorporated Urban Service Areas in a compact manner using vacant "infill" parcels and lands next to existing development at the edge of these areas.	
Objective LU-3.3: Encourage "infill" development within the expansion areas of the cities and unincorporated communities. **Policy LU-3b:** In designated Urban Service Areas, maintain a residential holding capacity that is as close as possible to projected growth. Consider denial of Land Use Map amendments that add residential density if residential holding capacity exceeds projected growth, recognizing that future development may not use 100% of the capacity of all parcels. **Policy LU-3c**: Avoid urban sprawl by limiting extension of sewer or water services outside of designated Urban Service Areas pursuant to the policies of the Public Facilities and Services Element.	**Consistent.** The project is an infill development of a previously developed government site within an existing urbanized area with existing sewer and water services. Residential development associated with the project would not require a Land Use Map amendment or exceed projected growth.
Goal LU-4: Maintain adequate public services in both rural and Urban Service Areas to accommodate projected growth. Authorize additional development only when it is clear that a funding plan or mechanism is in place to provide needed services in a timely manner.	
Objective LU-4.1: Assure that development occurs only where physical public services and infrastructure, including school and park facilities, public safety, access and response times, water and wastewater management systems, drainage, and roads are planned to be available in time to serve the projected development.	**Consistent.** Development associated with the project would occur in an area with existing public services and infrastructure and would not require zoning changes. The project would contribute its fair share toward the provision of public services by also incorporating new spaces for government facilities.

General Plan Goals	Project Consistency
Policy LU-4a: If necessary, use zoning to assure that development shall occur only if public services are adequate or improvements are made to maintain an acceptable level of service. One such method could involve the use of "dual zoning" which would specify zoning with services and zoning without services. **Policy LU-4f:** Assure that new development contributes its fair share toward provision of the public services and infrastructure needed for projected growth.	
Goal LU-6: Diversify new residential development types and densities. Include a range of urban densities and housing types in some unincorporated communities, and lower density in rural communities. In rural areas, housing types and densities should meet the needs of agricultural and resource users and provide limited residential development on large parcels.	
Objective LU-6.1: Provide opportunities for a range of urban housing types and densities in unincorporated communities, while retaining the character of these communities. **Policy LU-6i:** Provide expanded opportunities for a mix of residential and commercial or industrial use in Urban Service Areas.	**Consistent.** The project proposes both residential and employment uses and would retain the character of the community. Please refer to Section 4.1, *Aesthetics*, for further discussion on the project's conformity with the surrounding area.
Objective LU-16.1: Avoid urban development within the Urban Service Boundary of Santa Rosa until annexation, except where allowed by the General Plan.	
Policy LU-16a: Require full urban improvement standards and services for discretionary commercial, industrial and urban residential projects within the Urban Service Boundary. **Policy LU-16b:** Consider requiring joint city/county design review for projects within the Santa Rosa Urban Service Boundary.	**Consistent.** The project site is located within an Urban Service Boundary and would be constructed to full urban standards. Although it is technically outside of the City of Santa Rosa's jurisdiction, the County has indicated intent to coordinate with the City of Santa Rosa, consistent with Policy LU-16b .

SONOMA COUNTY ZONING CODE

The project site does not have a County zoning designation but would comply with Sonoma County Zoning Code Section 26-02-070 which states that zoning does not apply to public projects of the County. The proposed development of additional public facilities, commercial/retail uses, government offices, and residential units would be consistent with surrounding land uses and would maintain similar site development standards. The introduction of commercial and retail uses would also provide on-site services and amenities that support both future residents and employees and complement existing commercial uses along Mendocino Avenue. Therefore, the project would not conflict with land use restrictions or compatibility criteria outlined in the Sonoma County Zoning Code and this impact would be less than significant.

4.10.4 Cumulative Impacts

The geographic scope of the cumulative land use/planning analysis is the City of Santa Rosa and surrounding areas. Currently planned and pending projects in Santa Rosa and surrounding areas are listed in Table 3-1 (refer to Chapter 3, Environmental Setting). In particular, the 1650 West Steele Lane Project, 3575 West Mendocino Avenue Project, the project located on the corner of Morgan Street and College Avenue, 528 B Street Project, the Ridley Avenue and Wyngate Drive Project, and the Chanate Road and Cobblestone Drive Project are either located in proximity or along the same major arterial as the project site and construction schedules may overlap. The cumulative analysis

considers the nearby past, present, and reasonably foreseeable future projects in these areas. Since the project results in no impact on the physical division of an established community, cumulative impacts related to division of established communities are not discussed herein.

A majority of the land use decisions for cumulative plans and projects listed in Table 3-1 are made at the City level. However, the proposed project is not subject to the City of Santa Rosa's land use authority, General Plan, or Municipal Code pursuant to Government Code Section 53090 and 53091. Although City policies do not apply to the proposed project, development within the city of Santa Rosa is governed by the Santa Rosa General Plan and Santa Rosa Municipal Code, which ensure logical and orderly land use development and require discretionary review to ensure that projects do not result in land use environmental impacts due to inconsistency with the General Plan and other regulations. Because the proposed project is consistent with the County's land use authority and does not create barriers, divide established communities, or otherwise conflict with applicable County planning documents, and because other cumulative projects would remain subject to their own applicable land use regulations, cumulative impacts related to potential conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.

4.11 Noise

This section analyzes noise-related impacts associated with implementation of the proposed project, including temporary noise impacts from construction activity and long-term noise impacts from expected operation of development facilitated by the project.

4.11.1 Environmental Setting

a. Fundamentals of Sound and Noise

Sound is a vibration that transmits through a medium (such as a gas, liquid, or solid) created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired, and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler et al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as the doubling of vehicle traffic volumes, results in a noise level increase of 3 dB, whereas dividing the energy in half results in a 3 dB decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy (i.e., the perception of sound is not linear in terms of dBA or in terms of sound energy). Two sources, each containing the same sound energy, do not "sound twice as loud" as one source. It is widely accepted that the average healthy human ear can detect changes (either increases or decreases) of 3 dBA, which is recognized as being barely perceptible to most people. Similarly, a change of 5 dBA is readily perceptible and a change of 10 dBA sounds twice (or half) as loud (Crocker 2007).

The level and frequency content of sound change as it travels from the source to a receiver. The most obvious change is the decrease in level as the distance from the source increases. The manner by which sound is reduced with distance depends on factors, such as the type of source (e.g., a point or line source), the path the sound travels, site conditions, and the presence of intervening structures or other obstacles. Noise from a point source (e.g., construction equipment, industrial machinery, ventilation units) typically is reduced at a rate of 6 dBA per each doubling of distance away from the source. Noise from a line source (e.g., roadway, pipeline, railroad) typically is reduced at a rate of 3 dBA per doubling of distance away from the source (Caltrans 2013). The propagation of noise is also affected by the absorption characteristics of the ground: a hard site, such as a parking lot or smooth body of water, provides no absorption/attenuation and the changes in noise levels with distance result simply from the geometric spreading of the source (i.e., 3 or 6 dBA reduction per doubling of distance for a point source or line source, respectively). Conversely, a soft site, such as soft dirt, grass, or scattered bushes and trees, may provide additional absorption/attenuation, potentially reducing noise levels an additional 1.5 dBA per doubling of distance away from the source (Caltrans 2013). Noise levels may also be reduced by intervening structures. The amount of reduction provided by the "shielding" of these features depends on the

size of the structure/s, the location of the structure/s relative to the noise source and receivers, and the frequency content of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight between a noise source and receiver will provide at least a 5 dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). The presence of building structures can substantially reduce noise levels from the exterior to the interior as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

Descriptors

The impact of noise is not a function of loudness alone. The time of day at which noise occurs and the duration of the noise are also important factors when considering potential noise impacts. Most noise that lasts for more than a few seconds is variable in its amplitude (i.e., the noise level continuously fluctuates over time). Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent continuous sound level (L_{eq}), which considers both duration and the sound power level of the source. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. The extent of sound level fluctuations over a period of time is characterized by the minimum (L_{min}) and maximum (L_{max}) sound pressure levels, which represent the lowest and highest sound pressure levels measured during a given period, respectively.

The sound level that is exceeded "n" percent of time during a given sample period in the percentile noise level is represented as L_n. For example, the L_{50} level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period); that is, half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the "median sound level." The L_{10} level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum), and this is often known as the "intrusive sound level." The L_{90} is the sound level exceeded 90 percent of the time and is often considered the "effective background level" or "residual noise level."

Noise that occurs at night tends to be more disturbing than noise that occurs during the day. Community noise is usually measured using the Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.) hours. It is also measured using the Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring during evening hours (7:00 p.m. to 10:00 p.m.) and a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.) (Caltrans 2013). Noise levels described by the L_{dn} and CNEL usually differ by about 1 dBA. The relationship between the peak-hour L_{eq} value and the L_{dn}/CNEL depends on the distribution of traffic during the day, evening, and night.

b. Fundamentals of Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a vibrating source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body ranges between less than 1 Hz to 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as that from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (Federal Transit Administration [FTA] 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern of vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration amplitudes are usually expressed in peak particle velocity (PPV), or root mean squared (RMS) vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

c. Existing Noise Setting

The most prominent source of noise in the vicinity of the project site is vehicle traffic on nearby roadways (US 101, Mendocino Avenue, and Bicentennial Way). To characterize the ambient noise environment in the project vicinity, four short-term (15-minute) noise level measurements were conducted on January 28, 2025. A SoftdB Piccolo-II, ANSI Type 2 integrating sound level meter was used to conduct the measurements. The sound level meter was field calibrated before and after the measurements. Short-term measurement 1 (ST-1) was conducted at the western boundary of the office site of the project, along Administration Drive; ST-2 was conducted at the southern boundary of the office site of the project, approximately 120 feet north of Meyers Drive; ST-3 was conducted at the southeastern corner of the residential site of the project site, just northwest of the intersection of Mendocino Avenue and Administration Drive; and ST-4 was conducted approximately 50 feet northwest of the intersection of Paulin Drive and Fiscal Drive. Approximate noise measurement locations are shown in Figure 4.11-1. Short-term noise measurement results are shown in Table 4.11-1.

Table 4.11-1 Short-Term Noise Measurement Results

Measurement Location	Location Description	Sample Times[1]	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
ST-1	At western boundary of office site of project site, along Administration Drive	10:28 – 10:43 a.m.	Approximately 185 feet east of US 101 northbound centerline	61	47	83
ST-2	At southern boundary of office site of project site, approximately 120 feet north of Meyers Drive	10:48 – 11:03 a.m.	Approximately 30 feet south of Administration Drive centerline	67	55	85
ST-3	At southeastern corner of residential site of project site, just northwest of intersection of Mendocino Avenue and Administration Drive	11:12 – 11:27 a.m.	Approximately 70 feet west of Mendocino Avenue centerline	53	44	68

Measurement						
ST-4	Approximately 50 feet northwest of intersection of Paulin Drive and Fiscal Drive	11:33 – 11:49 a.m.	Approximately 60 feet north of Fiscal Drive centerline	66	61	69

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; L_{min} = minimum sound level, L_{max} = maximum sound level

[1] All short-term noise measurement locations were conducted on January 28, 2025.

See Figure 4.11-1 for approximate noise measurement locations; see Appendix J for short-term noise measurement data.

The County's Guidelines for the Preparation of Noise Analysis provides guidance to conduct long-term noise measurements to determine the ambient noise environment of a project site. For this analysis, the long-term noise environment has been determined using the noise contours from the City of Santa Rosa General Plan 2035. Note that both the City's General Plan 2035 and the more recent General Plan 2050 present existing citywide noise contours; however, the noise contours presented in the General Plan 2035 show higher noise levels at the project site than those presented in the General Plan 2050. Therefore, the contours from the General Plan 2035 were used, as this represents a more conservative analysis for evaluating impacts related to the project site's compatibility with applicable land uses compatibility guidelines. Furthermore, these contours have been used to establish the existing ambient noise environment at the project site because the project site covers a large area and using individual measurements in one location would not provide full coverage of the project area for the noise land use compatibility analysis further below. Based on Figure 12-2 of the City's General Plan 2035, the entire site is within the noise contours from US 101, with the project site to the east of Ventura Avenue being exposed to noise levels between 60 and 65 dBA CNEL, and the project site to the west of Ventura Avenue being exposed to noise levels over 65 dBA CNEL (City of Santa Rosa 2009).

d. Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. The County's Guidelines for the Preparation of Noise Analysis lists noise-sensitive uses as residences (including single-family homes, multi-family apartments, condominiums, and mobile homes, and other permitted structures in residential use), schools (both public and private), day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors (County of Sonoma 2019).

The nearest noise sensitive receptors to the project site include single-family residences located along Major Drive, located as close as approximately 130 feet south of the southern project boundary. Other sensitive receptors in the vicinity of the project site include: a multi-family residential complex approximately 400 feet to the north of the northern project boundary; Rhio's Casa de Bambini Montessori Preschool & Daycare, located approximately 220 feet south of the southern project boundary; single-family residences along Lomitas Lane, as close as approximately 280 feet east of the eastern project boundary; Motel 6 Santa Rosa – South, located approximately 340 feet west of the western project boundary; and the Holiday Inn Express hotel, located approximately 390 feet southwest of the southwestern corner of the project boundary. The nearest sensitive receptors are shown in Figure 4.11-2.

Figure 4.11-1 Approximate Noise Measurement Locations

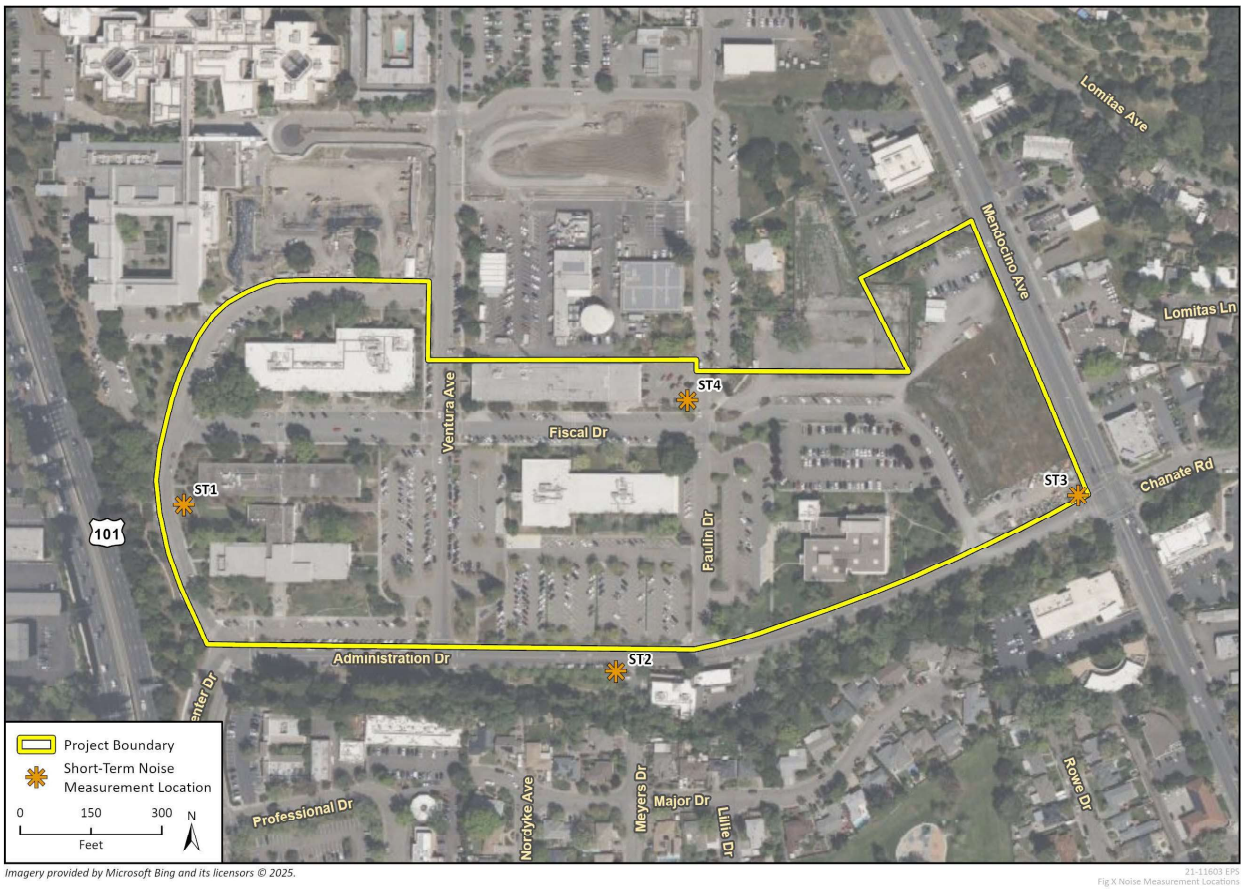
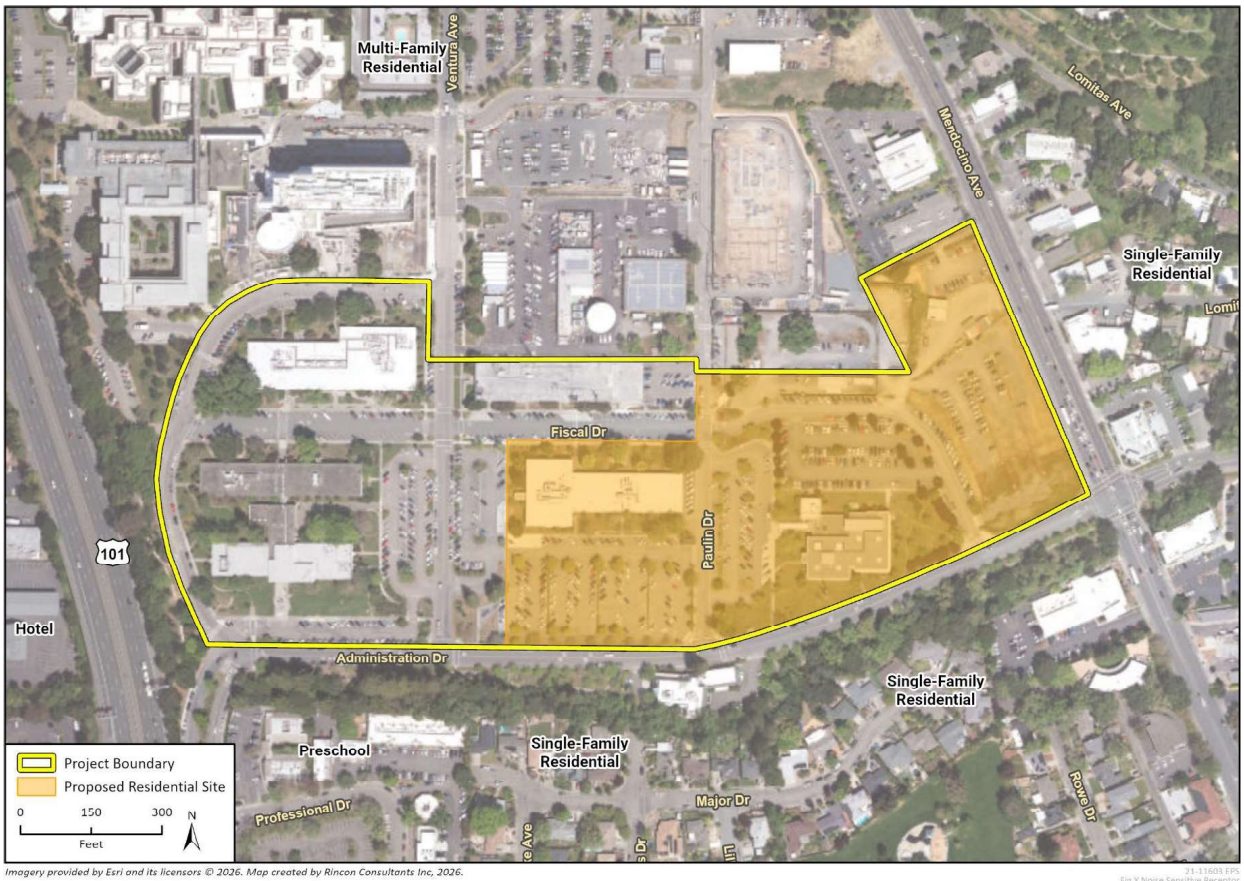


Figure 4.11-2 Noise Sensitive Receptors



4.11.2 Regulatory Setting

a. Federal

Department of Housing and Urban Development

The federal Department of Housing and Urban Development (HUD) sets environmental criteria and standards in Title 24 of the Code of Federal Regulations (CFR), Part 51. New construction proposed in areas that exceed 65 dBA L_{dn} must incorporate noise attenuation features to maintain interior noise levels at 45 dBA L_{dn} or below. Development in areas exceeding 65 dBA L_{dn} requires further attenuation features. HUD regulations apply to federally funded HUD projects. In general, the HUD regulations match the California state regulations discussed below.

Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual

The FTA provides criteria for assessing noise impacts during construction in the *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018). This document establishes construction noise limits based on the potential for adverse community reaction and construction vibration limits based on the potential for minor architectural (i.e., non-structural) damage to nearby structures. FTA construction noise and vibration limits are shown in Table 4.11-2 and Table 4.11-3, respectively.

Table 4.11-2 FTA Construction Noise Criteria

Residential	80	70
Commercial	85	85
Industrial	90	90

dBA = A-weighted decibels; L_{eq} = equivalent noise level

Source: FTA 2018

Table 4.11-3 FTA Construction Vibration Criteria

I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Nonengineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

PPV = peak particle velocity; in/sec = inches per second

Source: FTA 2018

b. State

California Building Code

CCR Title 24, Building Standards Administrative Code Part 2, the California Building Code, codifies the State noise insulation standards. These noise standards apply to new construction in California to control interior noise levels as they are affected by exterior noise sources. The regulations specify that interior noise levels for residential and school land uses shall not exceed 45 dBA CNEL.

California Green Building Code

The 2025 California Green Building Standards Code, Title 24, Part 11(CALGreen) Section 5.507.4, Acoustical Control, regulates construction within the 65 dBA CNEL contour of an airport or within the 65 dBA CNEL or L_{dn} contour of a freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1.1, "buildings exposed to a noise level of 65 dB L_{eq} (1-hr) during any hour of operation shall have building, addition, alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum STC of 40 (or OITC 30) or performance method described below (CALGreen Section 5.507.4.2).

1. Projects may demonstrate compliance through the performance method if wall and roof-ceiling assemblies exposed to the noise source shall be constructed to provide an interior noise environment that does not exceed 50 dBA L_{eq} (1-hr) in occupied areas during any hour of operation.

California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions, including the County of Sonoma, have the authority to set specific noise standards based on local conditions. Please refer to the discussion below, under *Sonoma County General Plan 2020*, for the compatibility guidelines adopted by the County of Sonoma.

c. Local Regulations

Sonoma County General Plan 2020

The Noise Element of the Sonoma County General Plan 2020 serves to reduce existing and future noise conflicts and achieve noise compatibility between land uses within the County. Applicable goals, objectives, and policies contained in the County's Noise Element include:

Goal NE-1: Protect people from the adverse effects of exposure to excessive noise and to achieve an environment in which people and land uses may function without impairment from noise.

Objective NE-1.1: Provide noise exposure information so that noise impacts may be effectively evaluated in land use planning and project review.

Objective NE-1.2: Develop and implement measures to avoid exposure of people to excessive noise levels.

Objective NE-1.3: Protect the present noise environment and prevent intrusion of new noise sources which would substantially alter the noise environment.

Objective NE-1.4: Mitigate noise from recreational and visitor serving uses. The following policies shall be used to achieve the above objectives:

Policy NE-1a: Designate areas within Sonoma County as noise impacted if they are exposed to existing or projected exterior noise levels exceeding 60 dB L_{dn}, 60 dB CNEL, or the performance standards of [Table 4.11-4].

Policy NE-1b: Avoid noise sensitive land use development in noise impacted areas unless effective measures are included to reduce noise levels. For noise due to traffic on public roadways, railroads and airports, reduce exterior noise to 60 dB L_{dn} or less in outdoor activity areas and interior noise levels to 45 dB L_{dn} or less with windows and doors closed. Where it is not possible to meet this 60 dB L_{dn} standard using a practical application of the best available noise reduction technology, a maximum level of up to 65 dB L_{dn} may be allowed but interior noise level shall be maintained so as not to exceed 45 dB L_{dn}. For uses such as Single Room Occupancy, Work-Live, Mixed Use Projects, and Caretaker Units, exterior noise levels above 65 dB L_{dn} or the [Table 4.11-4] standards may be considered if the interior standards of 45 dB L_{dn} can be met. For schools, libraries, offices, and other similar uses, the interior noise standard shall be 45 dB L_{eq} in the worst-case hour when the building is in use.

Policy NE-1c: Control non-transportation related noise from new projects. The total noise level resulting from new sources shall not exceed the standards in [Table 4.11-4] as measured at the exterior property line of any adjacent noise sensitive land use. Limit exceptions to the following:

(1) If the ambient noise level exceeds the standard in Table 4.11-4, adjust the standard to equal the ambient level, up to a maximum of 5 dBA above the standard, provided that no measurable increase (i.e. +/- 1.5 dBA) shall be allowed

(2) Reduce the applicable standards in [Table 4.11-4] by five dBA for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises, such as pile drivers and dog barking at kennels

(3) Reduce the applicable standards in [Table 4.11-4] by 5 decibels if the proposed use exceeds the ambient level by 10 or more decibels

(4) For short term noise sources which are permitted to operate no more than six days per year, such as concerts or race events, the allowable noise exposures shown in [Table 4.11-4] may be increased by 5 dB. These events shall be subject to a noise management plan including provisions for maximum noise level limits, noise monitoring, complaint response and allowable hours of operation. The plan shall address potential cumulative noise impacts from all events in the area.

(5) Noise levels may be measured at the location of the outdoor activity area of the noise sensitive land use, instead of the exterior property line of the adjacent noise sensitive land use where:

   (a) the property on which the noise sensitive use is located has already been substantially developed pursuant to its existing zoning, and

   (b) there is available open land on those noise sensitive lands for noise attenuation. This exception may not be used on vacant properties which are zoned to allow noise sensitive uses.

Table 4.11-4 Maximum Allowable Exterior Noise Exposures for Non-Transportation Noise Sources

L_{50} (30 minutes in any hour)	50	45
L_{25} (15 minutes in any hour)	55	50
L_{08} (4 minutes 48 seconds in any hour)	60	55
L_{02} (72 seconds in an hour)	65	60

[1] The sound level exceeded n% of the time in an hour, e.g., the L_{50} is the value exceeded 50% of the time or 30 minutes in any hour.

Source: Sonoma County General Plan 2020 Noise Element, Table NE-2 (County of Sonoma 2012).

Policy NE-1d: Consider requiring an acoustical analysis prior to approval of any discretionary project involving a potentially significant new noise source or a noise sensitive land use in a noise impacted area. The analysis shall:

(1) Be the responsibility of the applicant,

(2) Be prepared by a qualified acoustical consultant,

(3) Include noise measurements adequate to describe local conditions,

(4) Include estimated noise levels in terms of L_{dn} and/or the standards of [Table 4.11-4] for existing and projected future (20 years hence) conditions, based on accepted engineering data and practices, with a comparison made to the adopted policies of the Noise Element. Where low frequency noise (ex: blasting) would be generated, include assessment of noise levels and vibration using the most appropriate measuring technique to adequately characterize the impact,

(5) Recommend measures to achieve compliance with this Element. Where the noise source consists of intermittent single events, address the effects of maximum noise levels on sleep disturbance,

(6) Include estimates of noise exposure after these measures have been implemented, and

(7) Be reviewed by the Permit and Resource Management Department and found to be in compliance with PRMD guidelines for the preparation of acoustical analyses.

Policy NE-1e: Continue to follow building permit procedures to ensure that requirements based upon the acoustical analysis are implemented.

Policy NE-1f: Require development projects that do not include or affect residential uses or other noise sensitive uses to include noise mitigation measures where necessary to maintain noise levels compatible with activities planned for the project site and vicinity.

Policy NE-1g: Enforce the State Noise Insulation Standards (Title 24, Part 2, California Administrative Code and Appendix Chapter 12 of the California Building Code) concerning new multiple occupancy dwellings.

Sonoma County Guidelines for Preparation of Noise Analysis

The Sonoma County Guidelines for the Preparation of Noise Analysis outlines the methods and recommendations for use when preparing an acoustical analysis in Sonoma County (County of Sonoma 2019). The County Guidelines build on the Sonoma County General Plan 2020 Noise Element and outline the noise analysis process, criteria for requiring a noise analysis, noise analysis protocol, and noise management methodology for individual projects. While the County Guidelines

were not specifically developed for plan-level analyses, this analysis has been prepared in accordance with the County Guidelines.

The County Guidelines address temporary construction noise, which is not specifically included in the General Plan 2020 Noise Element. The County Guidelines state that temporary construction noise generally needs to be evaluated at a qualitative level, given its temporary and short-term nature, however, construction noise may be considered significant if it occurs in the early morning or evening hours and require a quantitative analysis. If construction activities occur during the hours 10:00 p.m. to 7:00 a.m., or occurs for more than one year, then the noise standards in Table 4.11-4 would apply.

City of Santa Rosa General Plan 2050

As described in Chapter 2, *Project Description*, the project site is not governed by the City of Santa Rosa's General Plan since it is County-owned property. However, for informational purposes, the Santa Rosa General Plan Safety, Climate Resilience, Noise, and Public Services and Facilities Element (City of Santa Rosa 2025) discusses noise sources and provides noise standards related to noise compatibility between land uses, shown in Table 4.11-5.

Table 4.11-5 Land Use Compatibility Standards

	Community Noise Exposure, L_{dn} or CNEL, dBA			
Land Use Category	**Normally Acceptable**	**Conditionally Acceptable**	**Normally Unacceptable**	**Clearly Unacceptable**
Residential – Low Density Single Family, Duplex, Mobile Homes	<60	55–70	70–75	>75
Residential – Multifamily	<65	60–70	70–75	>75
Transient Lodging – Motels, Hotels	<65	60–70	70–80	>80
Schools, Libraries, Churches, Hospitals, Nursing Homes	<70	60–70	70–80	>80
Auditorium, Concert Halls, Amphitheaters	–	<70	–	>65
Sports Arena, Outdoor Spectator Sports	–	<75	–	>70
Playgrounds, Neighborhood Parks	<70	67.5–75	–	>72.5
Golf Courses, Riding Stables, Water Recreation, Cemeteries	<75	70–80	>80	–
Office Buildings, Business Commercial and Professional	<70	67.5–77.5	>75	–
Industrial, Manufacturing Utilities, Agriculture	<75	70–80	>75	–

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any building involved is of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: City of Santa Rosa General Plan 2050 Noise Element, Figure 5-13 (City of Santa Rosa 2025).

In addition to the City's noise compatibility standards shown in Table 4.11-5, the following goals and policies from the General Plan 2050 Safety, Climate Resilience, Noise, and Public Services and Facilities Element are shown for informational purposes:

Goal 5-7: Protect the community from adverse noise impacts that can decrease quality of life**.**

> **Policy 5-7.1**: Maintain and enforce the City's Noise Ordinance to protect the health and comfort of people living, working, going to school, and recreating in Santa Rosa.

Goal 5-8: Proactively plan for noise from new community-serving land uses in appropriate areas.

> **Policy 5-8.1:** Promote opportunities for local activities and entertainment, such as music, theater, sports, and other entertainment activities.

City of Santa Rosa Municipal Code

As described in Chapter 2, *Project Description*, the project site is not governed by the City of Santa Rosa's Municipal Code since it is County-owned property. However, for informational purposes the Santa Rosa City Code (SRCC) includes several sections that regulate noise in development. Chapter 17-16 of the SRCC contains the city's noise level standards. Section 17-16.030 establishes base (ambient noise level) criteria from which noise levels can be compared (see Table 4.11-6).

Table 4.11-6 Ambient Base Noise Level Criteria

Zone	Time	Sound Level A (decibels) Community Environment Classification
R1 and R2	10:00 p.m. to 7:00 a.m.	45
R1 and R2	7:00 p.m. to 10:00 p.m.	50
R1 and R2	7:00 a.m. to 7:00 p.m.	55
Multi-family	10:00 p.m. to 7:00 a.m.	50
Multi-family	7:00 a.m. to 7:00 p.m.	55
Office & Commercial	10:00 p.m. to 7:00 a.m.	55
Office & Commercial	7:00 a.m. to 7:00 p.m.	60
Intensive Commercial	10:00 p.m. to 7:00 a.m.	55
Intensive Commercial	7:00 a.m. to 7:00 p.m.	65
Industrial	Anytime	70

Source: SRCC, Section 17-16.030.

Section 17-16.120 contains restrictions on machinery and equipment noise sources, stating that "[i]t is unlawful for any person to operate any machinery, equipment, pump, fan, air-conditioning apparatus or similar mechanical device in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient base noise level by more than five decibels."

4.11.3 Impact Analysis

A project-level analysis is appropriate for the office site, as the specific planning, construction, and operational details can be evaluated. The project-level analysis evaluates the proposed office buildings, for which construction would begin as early as 2027. A programmatic analysis is suitable for the residential site because it is not yet a designed development project. Development of the residential site would construct up to 1,500 units and 20,000 square feet of retail/commercial space,

with construction of the residential site completed by 2031. The residential site represents a conceptual program for future housing and is analyzed on a programmatic level.

a. Significance Thresholds

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this EIR, implementation of the project may have a significant adverse impact if it would result in any of the following:

1. 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.
2. Generation of excessive groundborne vibration or groundborne noise levels.
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

Specific thresholds of significance based on CEQA Appendix G Guidelines are discussed further in the following sections.

Construction Noise

The County Noise Guidelines state that due to the temporary and short-term nature of construction, noise impacts resulting from construction activity generally only need to be evaluated qualitatively. However, the County Guidelines establish noise standards for nighttime construction, stating that noise impacts resulting from construction activity occurring in the early morning or evening hours (i.e., between 10:00 p.m. and 7:00 a.m.) may be considered significant if construction noise levels were to exceed the applicable noise thresholds shown in Table 4.11-4.

Operational Noise

Onsite Stationary Noise Sources

Operational noise levels generated by the project's onsite stationary noise sources would be considered significant if they were to exceed the County's noise limits shown in Table 4.11-4.

Offsite Mobile Noise Sources (Traffic)

For project-related traffic noise, impacts would be considered significant if the project would result in exposure of sensitive receptors to an unacceptable increase in noise levels. For purposes of this analysis, a significant impact would occur if project-related traffic were to increase the ambient noise environment of noise-sensitive locations by 3 dBA or more if the locations are subject to noise levels in excess of 60 dBA CNEL for exterior areas or 45 dBA CNEL for interior noise levels, or by 5 dBA or more if the locations are not subject to noise levels in excess of the aforementioned standards.

Vibration

Vibration impacts would be considered significant if vibration levels associated with construction of the proposed project were to exceed the limits recommended by the FTA, shown in Table 4.11-3.

Based on the limits shown in Table 4.11-3, construction vibration impacts would be significant if vibration levels were to exceed 0.2 in/sec PPV at offsite residential structures or 0.3 in/sec PPV at offsite commercial structures.

Land Use Compatibility

Per General Plan Policy NE-1a and Policy NE-1b, noise impacts upon the residential site would be considered significant if surrounding transportation noise sources were to expose the project's outdoor activity areas to noise levels exceeding 60 dB L_{dn} or the project's interior habitable spaces to noise levels exceeding 45 dB L_{dn}. Per Policy NE-1b, a 45 dB L_{eq} interior standard would also apply to the office site.

b. Methodology

Construction Noise

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment.

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the L_{eq} of the operation. Each phase of construction has a specific equipment mix, depending on the work to be carried out during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some have more intermittent, high-impact noise levels.

Construction of the project would include the following activities:

- Demolition of the Fiscal Building (located at 585 Fiscal Drive) and construction of the proposed Office Building and Emergency Coordination Center (ECC)
- Demolition of the Law Library/Registrar of Voters (ROV) building (located at 2604 Ventura Avenue/435–455 Fiscal Drive)
- Demolition of the Administration Building (located at 575 Administration Drive)
- Demolition of Permit Sonoma Building (located at 2550 Ventura Avenue), Human Services Building (located at 2550 Paulin Drive)
- Construction of parking lot and solar microgrid over covered parking area
- Construction of residential units and retail/commercial space.

Heavy-duty construction equipment expected to be used during construction activities would typically include backhoes, bulldozers, concrete saws, cranes, excavators, graders, pavers and paving equipment, rollers, and stationary equipment such as generators and air compressors. It is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location due to the different tasks performed by each piece of equipment. In addition, construction equipment would not be in constant use during the 8-hour operating day. For each construction activity, construction noise was conservatively evaluated assuming simultaneous operation of the three or four loudest pieces of equipment. Construction

equipment would be continuously moving around over the course of a workday, therefore in accordance with FTA recommendations,[1] construction noise impacts were from the approximate center of each work area for each construction activity. For demolition activities, the centers of the work areas were assumed to be at the approximate center of the footprints of the buildings to be demolished. Construction of the office site was evaluated from the approximate center of the proposed building footprints and parking lot boundaries, and construction of the residential site was evaluated from the approximate center of the residential site of the project.

Operational Noise Sources

The primary noise sources associated with operation of the proposed project would consist of onsite stationary noise sources such as heating, ventilation, and air conditioning (HVAC) equipment in the office and residential and commercial portions of the project site and offsite mobile noise sources such as vehicle traffic. An emergency generator would be placed on-site near the ECC. These operational noise sources are discussed further in the following sections.

Onsite Stationary Noise Sources

OFFICE SITE

HVAC Equipment

This analysis assumes the use of a typical rooftop unit for commercial applications such as the Carrier WeatherMaker 50FCQ rooftop heat pump. Based on manufacturer's specifications, the 20-ton unit (model 50FCQM28) has a sound power level of 85.9 dBA, which equates to a sound pressure level of approximately 77.9 dBA at 3.28 feet/1 meter (manufacturer's specifications included as Appendix K).

It is assumed that both the Office Building and ECC buildings within the office site would include rooftop HVAC equipment. Based on project information, the height of the Office Building would be limited to five stories or less, while the height of the ECC building would be one story.

It is assumed that up to ten pieces of HVAC equipment would be included on the rooftop of the Office Building and up to three pieces of HVAC equipment would be included on the rooftop of the ECC building. For purposes of this analysis, rooftop HVAC equipment on each building was assumed to be located in a grouping near the southern edge of each building's rooftop, as this location represents the greatest potential for noise impacts to nearby sensitive receptors (i.e., the single-family residences located near the southern project boundary). Noise levels associated with HVAC equipment were calculated at the nearest sensitive receptor while accounting for both the horizontal and vertical distances between the equipment and nearest receptor. Noise levels were calculated conservatively assuming that all pieces of equipment would be operating simultaneously. Noise produced by the project's HVAC equipment was assumed to operate a point source of noise, which has a characteristic noise reduction of 6 dBA per doubling of distance away from the source.

[1] The *FTA Transit Noise and Vibration Impact Assessment Manual* recommends evaluating construction noise impacts from the center of a construction site, stating that the distance variable in its recommended construction noise calculation "assumes that all equipment operates at the center of the project" (FTA 2018).

RESIDENTIAL SITE

HVAC Equipment

The project is also assumed to include outdoor HVAC equipment within the residential site, assumed to be located at the ground level. Locations of proposed HVAC equipment or residences have not yet been determined; therefore, HVAC units were conservatively assumed to be located along the eastern and southern project boundaries, which represent locations with the potential to generate the greatest noise impacts upon nearby sensitive receptors (i.e., single-family residences located to the east along Lomitas Lane and single-family residences located to the south along Major Drive).

Reference noise levels generated by HVAC equipment within the residential site were based on the use of a typical HVAC system: a 2.5-ton Carrier 24ABA4030 unit, which produces a noise level of 68 dBA L_{eq} at a distance of 3 feet (see Appendix K for manufacturer specification sheets). Noise levels generated by the project's HVAC equipment were estimated assuming that a grouping of ten HVAC units would be operating along both the eastern and southern project boundaries. Note that only the ten nearest HVAC units to the property line were accounted for as the noise produced by each farther HVAC unit would continue to decrease with distance and units further away would have a diminishing and negligible contribution to the combined noise level at the property line. HVAC units were conservatively assumed to operate simultaneously and continuously at full power. Noise produced by the project's HVAC equipment was assumed to operate a point source of noise, which has a characteristic noise reduction of 6 dBA per doubling of distance away from the source.

OFFSITE MOBILE NOISE SOURCES (TRAFFIC)

Traffic generated from development facilitated by the project would increase noise levels on surrounding roadways. Based on the project site location, it is assumed that users and workers would primarily access the project site via the following roadways: US 101, Bicentennial Way, Mendocino Avenue, and Steele Lane/Lewis Road. Traffic noise levels along segments of these roadways located near the project site were analyzed based on afternoon (PM) peak hour traffic volumes provided by Fehr & Peers (F&P 2026), shown in Table 4.11-7. PM peak hour traffic volumes were converted to average daily traffic (ADT) volumes with the assumption that the peak hour volumes represent approximately 10 percent of the ADT volumes.

Table 4.11-7 Existing and Future Traffic Volumes (PM Peak Hour)

		Existing		Existing Plus Project	
Roadway	**Segment**	**PM Peak Hour**	**ADT**	**PM Peak Hour**	**ADT**
US 101	North of Mendocino Avenue	3,859	38,590	3,891	38,910
Bicentennial Way	East of Mendocino Avenue	2,585	25,850	2,612	26,120
	West of Mendocino Avenue	4,323	43,230	4,397	43,970
Mendocino Avenue	North of Bicentennial Way	4,011	40,110	4,103	41,030
	South of Bicentennial Way	5,761	57,610	5,822	58,220
	South of Chanate Road	4,890	48,900	5,100	51,000
Steele Lane	West of Mendocino Avenue	3,908	39,080	4,071	40,710
Lewis Road	East of Mendocino Avenue	3,178	31,780	3,181	31,810

ADT = average daily traffic

Source: F&P 2026.

To assess the increase in ambient noise levels at nearby sensitive receptors along these roadways, traffic noise increases were determined using the following equation, based on the principle that a doubling of traffic volumes results in an approximate 3-dBA noise increase along that roadway:

$$Traffic\ Noise\ Increase = 10 * LOG\ (\frac{Future\ Traffic\ Volumes}{Existing\ Traffic\ Volumes})$$

Groundborne Vibration

Development facilitated by the project would not include any substantial vibration sources associated with operation. Therefore, construction activities have the greatest potential to generate ground-borne vibration affecting nearby receptors. The greatest vibratory sources expected during construction may be a vibratory roller during paving activities and large offroad equipment (such as a dozer, backhoe, grader, or excavator) during earthmoving activities. Vibration levels were estimated on typical vibration levels for these equipment types and distances these equipment types may be used relative to nearby sensitive receptors. Typical vibration levels for construction equipment expected to be used during construction of the proposed project are shown in Table 4.11-8.

Table 4.11-8 Typical Vibration Levels Produced by Various Construction Equipment

Vibratory Roller	0.21
Large[1] Earthmoving Equipment (e.g., Backhoe, Dozer, Excavator, Grader)	0.089

[1] "Large" equipment in this context refers to offroad equipment rated at 100 horsepower (hp) or greater.

Source: FTA 2018

c. Project Impacts and Mitigation Measures

Threshold 1:	Would the project result in generation of noise levels in excess of standards established in the County General Plan or Noise Ordinance?
	Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
	Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Impact NOI-1 TEMPORARY CONSTRUCTION NOISE LEVELS ASSOCIATED WITH THE PROJECT WOULD BE BE REDUCED TO LESS-THAN-SIGNIFICANT LEVELS THROUGH IMPLEMENTATION OF MITIGATION MEASURE NOI-1. PERMANENT OPERATIONAL NOISE LEVELS ASSOCIATED WITH THE PROJECT'S STATIONARY EQUIPMENT WOULD NOT EXCEED COUNTY NOISE STANDARDS. A PORTION OF THE PROJECT SITE IS LOCATED WITHIN THE NOISE-IMPACTED AREAS IDENTIFIED IN THE COUNTY'S GUIDELINES FOR THE PREPARATION OF NOISE ANALYSIS; HOWEVER, MITIGATION MEASURE NOI-2 WOULD REDUCE IMPACTS TO BELOW APPLICABLE THRESHOLDS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION MEASURES NOI-1 AND NOI-2.

Overall Project (Office and Residential Sites)

CONSTRUCTION

Following the methodology discussed above, construction noise levels were calculated at the nearest sensitive receptors for each phase of construction. Estimated construction noise levels for

each phase of construction (including both the residential site and office site) are presented for informational purposes in Table 4.11-9. As shown in Table 4.11-9, the highest construction noise levels are expected to reach up to approximately 72 dBA L_{eq} (8-hour) at the nearest single-family residences located along the Major Drive cul-de-sac (situated south of the project site) during demolition of the Human Services Building, which represents construction activity that would generate the highest noise levels at nearby sensitive receptors. Construction noise levels at other nearby sensitive receptors during other phases of construction would be lower due to the even greater distances between other construction activities and receptors. However, if construction activities occur outside of the hours of 7:00 a.m. to 7:00 p.m. on weekdays and 7:00 a.m. to 5:00 p.m. on weekends, impacts would be potentially significant and Mitigation Measure NOI-1 would be required.

Table 4.11-9 Summary of Construction Noise Levels at Nearest Sensitive Receptors by Phase

Construction Activity	Sub-Phase	RCNM Reference Noise Level at 50 feet	Nearest Sensitive Receptor	Distance to Nearest Sensitive Receptor (feet)	Construction Noise Level at Nearest Sensitive Receptor (dBA L_{eq} [8-hour])
Demolition of Fiscal Building	Demolition	86	Rhio's Casa de Bambini Preschool located south of the project site	795	62
Construction of Office Building	Site Preparation	82		810	58
	Grading	85		810	61
	Building Construction	84		810	60
	Architectural Coating	76		810	52
Demolition of Law Library/ ROV Building	Demolition	87	Single-family residence along Major Drive, located south of the project site	735	63
Demolition of Administrative Building	Demolition	87	Rhio's Casa de Bambini Preschool located south of the project site	480	67
Construction of Parking Lot	Site Preparation	85		415	66
	Grading	86		415	68
	Paving	85		415	66
	Architectural Coating	76		415	58
Demolition of Permit Sonoma Building	Demolition	86	Single-family residence along Major Drive, located south of the project site	495	66
Demolition of Human Services Building	Demolition	86	Single-family residence along Major Drive cul-de-sac, located south of the project site	245	72
Construction of Solar Microgrid	Site Preparation	82	Rhio's Casa de Bambini Preschool located south of the project site	415	64
	Grading	85		415	66
	Building Construction	82		415	64
	Architectural Coating	76		415	58
Construction of ECC	Site Preparation	82	Single-family residence along Major Drive, located south of the project site	735	59
	Grading	85		735	61
	Building Construction	84		735	61
	Architectural Coating	76		735	53

Construction Activity	Sub-Phase	RCNM Reference Noise Level at 50 feet	Nearest Sensitive Receptor	Distance to Nearest Sensitive Receptor (feet)	Construction Noise Level at Nearest Sensitive Receptor (dBA L_{eq} [8-hour])
Construction of residential Site	Demolition	88	Single-family residence along Major Drive cul-de-sac, located south of the project site	450	69
	Site Preparation	85		450	66
	Grading	87		450	68
	Building Construction	84		450	65
	Paving	85		450	65
	Architectural Coating	76		450	57

RCNM = Roadway Construction Noise Model; dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level

See Appendix L for construction noise modeling outputs.

Office Site

OPERATION (ONSITE STATIONARY NOISE SOURCES)

As discussed above, the primary onsite stationary noise sources associated with operation of the office site would be HVAC equipment. Following the methodology discussed above, noise levels associated with operation of HVAC equipment within the office site were calculated and are presented in Table 4.11-10. As shown in Table 4.11-10, noise levels associated with HVAC equipment within the office site would not exceed the County's noise thresholds at the nearest sensitive receptors located to the south of the project site. This analysis conservatively does not account for the baseline noise levels generated by the current uses at the project location. Operational noise impacts associated with the project's stationary noise sources within the office site would be less than significant. Emergency Generator

A 2,000-kW emergency generator would be placed on-site near the ECC (ECC). Specific information regarding the generator manufacturer and model are not known at this time; therefore, this analysis assumes a typical diesel generator such as a Caterpillar 3516C unit, which produces a noise level of 79 dBA at a distance of 7 meters (23 feet) when operating under 100 percent load (Caterpillar 2024).

The closest sensitive receptor to the generator would be the apartment complex located to the north off Ventura Avenue at a distance of approximately 725 feet.. According to emissions modeling assumptions used in the Air Quality Analysis, the generator would be operated up to 100 hours per year and a maximum of two hours per day for maintenance testing and emergency use. It is conservatively assumed that operation of the generator would occur during nighttime hours. Assuming that the generator would be operated continuously for a two-hour period, the resulting noise level at the nearest sensitive receptor to the north would be approximately 44 dBA L_{eq}, which would not exceed the County's L_{50} nighttime noise threshold of 45 dBA. If operated for shorter durations, the resulting average noise levels would be even lower; therefore, noise levels produced by operation of the generator would also not exceed the County's L_{25}, L_{08}, and L_{02} nighttime noise thresholds of 50, 55, and 60 dBA, respectively. Noise impacts from the generator would be less than significant.

Residential Site

OPERATION (ONSITE STATIONARY NOISE SOURCES)

As discussed above, the primary onsite stationary noise sources associated with operation of the residential site would be HVAC equipment. Following the methodology discussed above, noise levels associated with operation of HVAC equipment within the residential site were calculated and are presented in Table 4.11-11. As shown in Table 4.11-11, noise levels associated with HVAC equipment within the residential site would not exceed the County's noise thresholds at the nearest sensitive receptors located to the east and south of the project site. Operational noise impacts associated with the project's stationary noise sources within the residential site would be less than significant.

Table 4.11-10 Operational Noise Levels (Office Site)

Noise Source	Building	Nearest Sensitive Receptor	Approximate Distance to Nearest Sensitive Receptor (feet)[1]	Operational Noise Level at Nearest Sensitive Receptor (dBA)	Applicable County Noise Threshold (dBA)[4]	Exceeds County Noise Threshold?
Rooftop HVAC Equipment	Office Building	Single-family residences along Major Drive to the south	763	41[2]	45	No
Rooftop HVAC Equipment	ECC	Single-family residences along Major Drive to the south	685	36[3]	45	No

dBA = A-weighted decibel

[1] Note that this distance includes both the horizontal and vertical distances between HVAC equipment and nearest sensitive receptor.

[2] This noise level was calculated assuming ten HVAC units would be operating simultaneously.

[3] This noise level was calculated assuming three HVAC units would be operating simultaneously.

[4] Note that HVAC equipment may operate continuously during both daytime and nighttime hours; however, the County's nighttime noise limit (45 dBA) is lower than the daytime noise limit (50 dBA) and represents a more conservative threshold. Therefore, compliance with the stricter nighttime threshold would also result in compliance with the daytime threshold. The applicable noise threshold is the County's nighttime noise threshold of 45 dBA, which was used to evaluate HVAC noise impacts.

Table 4.11-11 Operational Noise Levels (Residential Site)

Noise Source	Building	Nearest Sensitive Receptor	Approximate Distance to Nearest Sensitive Receptor (feet)	Operational Noise Level at Nearest Sensitive Receptor (dBA)	Applicable County Noise Threshold (dBA)[3]	Exceeds County Noise Threshold?
HVAC Equipment	Along Southern Project Boundary	Single-family residences along Major Drive to the south	175	43[1]	45	No
HVAC Equipment	Along Eastern Project Boundary	Single-family residences along Lomitas Lane to the east	270	40[2]	45	No

dBA = A-weighted decibel

[1] This noise level was calculated assuming ten HVAC units would be operating simultaneously.

[2] This noise level was calculated assuming ten HVAC units would be operating simultaneously.

[3] Note that HVAC equipment may operate continuously during both daytime and nighttime hours; however, the County's nighttime noise limit (45 dBA) is lower than the daytime noise limit (50 dBA) and represents a more conservative threshold. Therefore, compliance with the stricter nighttime threshold would also result in compliance with the daytime threshold. The applicable noise threshold is the County's nighttime noise threshold of 45 dBA, which was used to evaluate HVAC noise impacts.

Overall Project (Office and Residential Sites)

OPERATION (OFFSITE MOBILE NOISE SOURCES, I.E., TRAFFIC)

Following the methodology discussed in the *Offsite Mobile Noise Sources (Traffic)* section above, traffic noise increases along roadway segments near the project site were estimated for the combined increase from the office site and residential site. A comparison of existing and existing plus project PM peak hour and ADT volumes for roadway segments included in this analysis and associated noise increases on each roadway segment is presented in Table 4.11-12. As shown in Table 4.11-12, the project's traffic noise increases on roadway segments near the project site would be approximately 0.2 dBA and below. Therefore, the project would not increase the existing ambient noise environment by 3 dBA or more and traffic noise impacts associated with the project would be less than significant.

Table 4.11-12 Traffic Noise Increases on Roadway Segments Near Project Site

		Existing		Existing Plus Project		Noise Increase (dBA)
Roadway	Segment	PM Peak Hour	ADT	PM Peak Hour	ADT	
US 101	North of Mendocino Avenue	3,859	38,590	3,891	38,910	>0.1
Bicentennial Way	East of Mendocino Avenue	2,585	25,850	2,612	26,120	>0.1
	West of Mendocino Avenue	4,323	43,230	4,397	43,970	>0.1
Mendocino Avenue	North of Bicentennial Way	4,011	40,110	4,103	41,030	0.1
	South of Bicentennial Way	5,761	57,610	5,822	58,220	>0.1
	South of Chanate Road	4,890	48,900	5,100	51,000	0.2
Steele Lane	West of Mendocino Avenue	3,908	39,080	4,071	40,710	0.2
Lewis Road	East of Mendocino Avenue	3,178	31,780	3,181	31,810	>0.1

ADT = average daily traffic
Source: F&P 2026.

Overall Project (Office and Residential Sites)

LAND USE COMPATIBILITY

Table 1 of the County's Guidelines for the Preparation of Noise Analysis (County of Sonoma 2019) states that a noise analysis is required when placing a noise-sensitive land use (such as residences or office buildings) located in or adjacent to:

1. A noise-generating land use;
2. A noise-impacted area identified in Attachment C of the Guidelines for the Preparation of Noise Analysis (roads and highways within the 60 and 65 dB L_{dn} contours);
3. 300 feet of a railroad line;
4. 900 feet of a railroad crossing; and/or
5. A public airport.

Based on Figure 12-2 of the City of Santa Rosa's General Plan, the entire site is within the noise contours from US 101, with the project site to the east of Ventura Avenue being exposed to noise

levels between 60 and 65 dBA CNEL, and the project site to the west of Ventura Avenue being exposed to noise levels over 65 dBA CNEL (City of Santa Rosa 2009). Noise levels described by L_{dn} and CNEL usually differ by about 1 dBA. In addition, while the County's General Plan uses dB rather than dBA in its standards, these two metrics are functionally the same for a traffic noise analysis. Therefore, the entire project site would be located within an area that exceeds 60 dB L_{dn}. As a result and assuming a 15 dBA reduction from the exterior to interior environment, the residential and retail/commercial portion of the project site may also be exposed to interior noise levels exceeding 45 dBA L_{dn} or 45 dB L_{eq}. Noise impacts related to the County's General Plan noise standards upon these portions of the project site would be potentially significant.

Mitigation Measures

The following mitigation measures would ensure construction noise would implement applicable best management practices and that the project would be consistent with the County's acceptable exterior and interior noise levels of 60 dB L_{dn} and 45 dB L_{dn}, respectively, for the residential site of the project and 45 dB L_{eq} in the worst-case hour when the building is in use for the office sites:

NOI-1 Construction Noise Best Management Practices

The project shall implement the following construction best management practices from the County Noise Guidelines:

- Limiting hours of construction to avoid the early morning and evening hours (7 a.m. to 7 p.m. weekdays and 7 a.m. to 5 p.m. weekends)
- Limiting work to non-motorized equipment on Sundays and holidays
- Using sound blankets for loud operations such as air compressors or other mechanical equipment
- Siting construction staging areas as far as practical from nearby sensitive receptors
- Require street legal mufflers on all construction equipment

NOI-2 Exterior and Interior Land Use Noise Compatibility Compliance

The entirety of the project site is exposed to exterior noise levels exceeding the County's noise compatibility standard of 60 dB L_{dn}; therefore, the project applicant shall coordinate with the project architects and other contractors to ensure compliance with the County's noise standards. For the proposed residential site, noise levels in outdoor activity areas shall not exceed 60 dB L_{dn} and interior noise levels shall not exceed 45 dB L_{dn} with windows and doors closed. For the proposed office building, interior noise levels shall not exceed 45 dB L_{eq} in the worst-case hour when the building is in use. Outdoor activity area includes, but is not limited to, yard areas, pools, patios, gardens, decks, and balconies of single-family dwellings and related accessory structures, and private or community outdoor use areas for multi-family developments, and other areas which have been designated for outdoor activities and recreation.

The specific project-level land use compatibility analysis for the residential site shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis (County of Sonoma 2019). The information contained in the analysis may include the layout and placement of proposed outdoor areas, and the wall, window, door, and room dimensions typical for the proposed buildings. With this specific plan information, the analysis shall determine the predicted exterior noise levels in outdoor use areas and interior noise levels within the planned buildings. If predicted noise levels are found to be in excess of the applicable limits, the report shall identify architectural materials or

techniques that shall be incorporated into the project to reduce noise levels to the applicable limits, which may include, but are not limited to, the following:

1. Exterior Noise Reduction (residential site Only)
   a) Use of sound walls between the outdoor areas and nearby roadways.
   b) Placement of the outdoor areas where building attenuation would partially block or fully block the line of sight between the outdoor use area and nearby roadways.

2. Interior Noise Reduction (residential and office sites)
   a) Orientation of noise-sensitive rooms within proposed buildings away from nearby roadways.
   b) Installation of windows, doors, and walls with higher Sound Transmission Class ratings over minimum standards.
   c) Installation or air conditioning or mechanical ventilation systems to allow windows and doors to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained.

Significance After Mitigation

Implementation of Mitigation Measure NOI-1 would reduce construction noise impacts to less than significant through compliance with allowed construction hours outside of nighttime hours and additional construction best management practices. Implementation of Mitigation Measure NOI-2 would require a land use compatibility analysis to maintain noise levels at the project site to within the County's noise standards. Mitigation Measure NOI-2 would require that exterior noise levels within the residential site be maintained at 60 dB L_{dn} or below in outdoor activity areas and interior noise levels would be maintained at 45 dB L_{dn} or below in all residences, with windows and doors closed. Mitigation Measure NOI-2 would also require that interior noise levels within the proposed office building and ECC be maintained at 45 dB L_{eq} during the worst-case hour when the building is in use. Implementation of Mitigation Measure NOI-2 would ensure that noise levels at the project site are within the County's land use compatibility noise standards, and noise impacts related to the County's noise standards would be less than significant. After implementation of Mitigation Measures NOI-1 and NOI-2, impacts would be less than significant.

Threshold 2:	Would the project result exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2 CONSTRUCTION ASSOCIATED WITH PAVING AND EARTHMOVING ACTIVITIES WOULD TEMPORARILY GENERATE VIBRATION LEVELS IN THE VICINITY OF THE PROJECT SITE THAT WOULD NOT EXCEED VIBRATION STANDARDS AT NEARBY STRUCTURES. THE PROJECT WOULD NOT INCLUDE SUBSTANTIAL SOURCES OF VIBRATION DURING OPERATION. VIBRATION IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

CONSTRUCTION

The greatest anticipated sources of vibration during general construction activities would be a vibratory roller during paving activities and large offroad equipment (such as a backhoe, dozer, excavator, or grader) during earthmoving activities. Based on the paved parking lot areas depicted on the site plan, a vibratory roller may be used as close as approximately 205 feet from the nearest

offsite residence located south of the project site along Major Drive. As shown in Table 4.11-8, a vibratory roller produces a vibration level of 0.21 in/sec PPV at a distance of 25 feet. At a distance of 205 feet, a vibratory roller would generate vibration levels up to 0.009 in/sec PPV, which would not exceed the FTA's threshold of 0.2 in/sec PPV at residential structures.

Large earthmoving equipment may be used along the project site boundary, as close as approximately 125 feet from the nearest offsite residence located south of the project site along Major Drive. As shown in Table 4.11-8, large earthmoving equipment produces a vibration level of 0.089 in/sec PPV at a distance of 25 feet. At a distance of 125 feet, a large earthmoving equipment would generate vibration levels up to 0.008 in/sec PPV, which would not exceed the FTA's threshold of 0.2 in/sec PPV at residential structures. Therefore, vibration impacts associated with construction of the project would be less than significant.

OPERATION

The proposed project would not include any operational sources of substantial vibration (e.g., pile driving, rail or heavy industrial operations). Vibration impacts associated with operation of the project would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3:	For a project located within a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact NOI-3 THE PROJECT SITE IS NOT LOCATED WITHIN TWO MILES OF AN AIRSTRIP OR AIRPORT OR WITHIN THE NOISE CONTOURS OF THE NEAREST AIRSTRIP OR AIRPORT; THEREFORE, THE PROJECT WOULD NOT EXPOSE WORKERS OR RESIDENTS TO EXCESSIVE AIRCRAFT-RELATED NOISE LEVELS AND NO IMPACTS WOULD OCCUR.

Overall Project (Office and Residential Sites)

The airport nearest to the project site is the Charles M. Schulz Sonoma County Airport, located approximately five miles northwest of the project site. There are no private airstrips in the project area. The Air Transportation Element of the County General Plan contains a noise contour map showing the 55 to 75 dBA CNEL noise contours associated with the Charles M. Schulz Sonoma County Airport. None of the noise contours overlap with the project site. Therefore, no substantial noise exposure from airport noise would occur to workers or residents of the project, and no impacts would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

There would be no impact.

4.11.4 Cumulative Impacts

Construction Noise

Noise generated during construction of the project, in combination with construction activities for other nearby cumulative projects that may be constructed simultaneously could, without mitigation, substantially increase noise levels in the vicinity of future projects if occurring in close proximity. Noise from construction of development projects is localized and typically has the potential to affect noise-sensitive uses within approximately 500 feet from the construction site. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to cumulatively considerable noise impacts for receptors located midway between the two construction sites. The nearest cumulative project located near the project site is a multi-family residential project located at 3575 Mendocino Avenue project, approximately 2,500 feet north of the northern project site boundary. Due to the large distance between the project site and 3575 Mendocino Avenue project site, construction activities occurring at both project sites would not result in cumulatively considerable construction noise impacts. Cumulative construction noise impacts would be less than significant.

Operational Noise

Onsite Stationary Noise Sources

Cumulative development would result in stationary (non-traffic) operational noise and vibration increases in the vicinity of the project site. Operational noise impacts may occur to sensitive receptors located in the vicinity of two or more project sites. As discussed above, the nearest cumulative project is a planned residential project located at 3575 Mendocino Avenue, situated approximately 2,500 feet north of the project site. Due to the large distance between the project site and 3575 Mendocino Avenue project site, cumulative operational noise levels would not be expected to exceed applicable thresholds. Furthermore, each cumulative project would be required to complete project- and site-specific noise assessments to evaluate operational noise impacts and mitigate each project accordingly to the noise standards of the jurisdiction where the project is located. Therefore, cumulative operational noise impacts would be less than significant.

Offsite Mobile Noise Sources

Cumulative development in the project vicinity would generate increased traffic noise levels due to new mobile noise sources (i.e., vehicles) traveling along roadway segments in the vicinity of the proposed project and cumulative project sites. Following the same methodology discussed in the *Offsite Mobile Noise Sources (Traffic)* section, traffic noise increases were estimated for cumulative plus project conditions. A comparison of existing and cumulative plus project traffic volumes on roadway segments near the project site, as well as the associated noise increases on each roadway segment, are presented in Table 4.11-13. As shown in Table 4.11-13, cumulative traffic noise increases on roadways near the project site would be approximately 1.6 dBA and below, which would not exceed the applicable significance threshold of 3 dBA. Therefore, cumulative traffic noise impacts would be less than significant.

Table 4.11-13 Cumulative Traffic Noise Increases

Roadway	Segment	Existing		Cumulative Plus Project		Noise Increase (dBA)
		PM Peak Hour	ADT	PM Peak Hour	ADT	
US 101	North of Mendocino Avenue	3,859	38,590	4,355	43,550	0.5
Bicentennial Way	East of Mendocino Avenue	2,585	25,850	3,712	37,124	1.6
	West of Mendocino Avenue	4,323	43,230	5,191	51,910	0.8
Mendocino Avenue	North of Bicentennial Way	4,011	40,110	4,227	42,267	0.2
	South of Bicentennial Way	5,761	57,610	6,190	61,897	0.3
	South of Chanate Road	4,890	48,900	5,557	55,573	0.6
Steele Lane	West of Mendocino Avenue	3,908	39,080	4,223	42,232	0.3
Lewis Road	East of Mendocino Avenue	3,178	31,780	3,371	33,707	0.3

ADT = average daily traffic
Source: F&P 2026.

Groundborne Vibration

The potential for construction groundborne vibration impacts is within relatively close distances (e.g., within approximately 25-feet for a vibratory roller) due to the fact that groundborne vibration levels attenuate rapidly through the ground at large distances. As discussed above, the nearest cumulative project is a planned residential project located at 3575 Mendocino Avenue, situated approximately 2,500 feet north of the project site. At this distance, cumulative vibration levels would be negligible. Cumulative groundborne vibration impacts would be less than significant.

4.12 Public Services and Recreation

This section assesses potential impacts related to public services, including fire and police protection, public schools, and parks and recreation facilities from the proposed project. Impacts related to water and wastewater infrastructure and solid waste collection and disposal are discussed in Section 4.14, *Utilities and Service Systems.*

4.12.1 Setting

a. Fire Services and EMS

The Santa Rosa Fire Department (SRFD) is responsible for protecting life, property, and the environment from fire, explosions, and hazardous materials incidents. The SRFD, which comprises three divisions – Administration Bureau, Fire Operations Bureau, and Fire Prevention Bureau – consists of more than 150 employees (SRFD 2025).

The Administration Bureau is responsible for overall department management, including development of new programs, promotion of life safety and environmental protection, and provision of administrative support for fire department personnel. The Administration Bureau also ensures effective functioning of divisions such as the Emergency Management Division (SFRD 2023).

The Fire Operations Bureau manages 10 fire stations around the city. The closest fire station to the project site is Fire Station 11 located approximately 0.7 miles east of the project site at 550 Lewis Street. The SRFD has 10 fire engines and two truck companies which help meet the City's General Plan goal of first resource arrival within 5 minutes of dispatch 90 percent of the time. The SRFD also has a secondary goal of providing full assignment response to larger incidents within 8 minutes 90 percent of the time. The SRFD responds to over 29,000 annual fire, emergency medical, rescue, and hazardous material incidents. Each fire engine is also staffed with a firefighter trained as a paramedic, who helps provide advanced life support services (SFRD 2023). According to the SRFD, 90 percent of incidents in 2018 were responded to in 6 minutes, 5 seconds or less. The SRFD also has a utilization rate of 161 incidents per 1,000 population (SRFD 2019).

The Fire Prevention Bureau is responsible for providing fire prevention services, including fire code permitting, hazardous materials management, weed and vegetation management, fire investigation, and community outreach services. The Fire Prevention Bureau is partially funded by fees paid for by those requesting services such as plan reviews and inspections, which helps reduce the need for general funds (SFRD 2023).

b. Police Services

The Santa Rosa Police Department (SRPD) is headquartered at 965 Santa Rosa Avenue and provides neighborhood-oriented policing services via patrol operations and traffic enforcement. The Police Department has 256 employees working within the community to provide public safety services (SRPD 2024). Neighborhood-oriented policing is based on encouraging citizen input and involvement to resolve issues concerning public safety, law enforcement, and criminal activity throughout the community. The SRPD is organized into three divisions: Field Services, Special Services, and Technical Services (SRPD 2024).

The SRPD processed 234,684 total calls in 2023, with an average response time of 6 minutes 57 seconds for priority one calls, 11 minutes 57 seconds for priority two calls, and 25 minutes 36 seconds for priority three calls[1] (SRPD 2023).

c. Schools

The city is served by eight public school districts, one community college, and 27 private schools, ranging from nursery/preschool to college. Public school districts cover the entire city, and private schools are sprinkled throughout the community offering alternative religious, special-needs, and other specialized programs. Santa Rosa Junior College also offers continuing education programs.

Table 4.12-1 shows the 2024 total enrollment for school districts within Santa Rosa was 28,352 students.

Table 4.12-1 Schools in Santa Rosa

School District	Number of Schools	2024 Enrollment
Bellevue (Elementary)	4	1,609
Bennett Valley (Elementary)	2	938
Kenwood (Elementary)	1	111
Mark West (Elementary)	4	1,342
Piner-Olivet (Elementary)	6	1,247
Rincon Valley (Elementary)	9	3,112
Roseland (Elementary)	3	2,730
Santa Rosa City (Elementary, Middle, High)	24	16,000
Wright (Elementary)	3	1,263
Total	**56**	**28,352**

Source: City of Santa Rosa 2024, California Department of Education 2024

d. Parks and Recreational Facilities

Two main types of parks exist in Santa Rosa – neighborhood parks and community parks. Neighborhood parks are generally between two and 10 acres in size and are located within about one-half mile of the residents they serve. Facilities at neighborhood parks often include picnic areas, playground equipment, and basketball courts. Community parks are generally between 10 to 25 acres and serve residents throughout the city. Community parks contain more space- and cost-intensive recreational facilities such as ball fields, pickleball courts, and tennis courts. Community parks are sited so that most residents will be no further than one mile from a community park facility (City of Santa Rosa 2009).

Currently, the Santa Rosa Recreation and Parks Department operates and maintains 72 parks totaling over 700 acres (City of Santa Rosa 2025). As required by General Plan Action 6-7.14, the City maintains a park standard of 6 acres of parkland per 1,000 residents. The City Council determines what ratio of neighborhood and community parkland, school playgrounds, and open space will

[1] Priority 1: A life-threatening emergency that requires an immediate response.
Priority 2: A non-life-threatening emergency that requires an immediate response.
Priority 3: A routine unscheduled call, such as a suspicious person or vehicle, a non-injury traffic accident, or a disturbance call.

satisfy this standard (City of Santa Rosa 2009). Currently the city is meeting this standard with a current ratio of 4 acres of parkland per 1,000 residents[2].

In addition to neighborhood and community parks, Santa Rosa has two community centers (the Steele Lane Community Center and the Finley Community Center), two aquatic facilities (the Ridgeway Swim Center and the Finley Swim Center), Bennett Valley Golf Course, and the Senior Center on Bennett Valley Road, all of which offer a wide variety of sports and recreation programs. The city also owns two clubhouse facilities at Doyle Park and Franklin Park that are available for meetings and gatherings. Additionally, the city has several citywide parks and special purpose parks and facilities that are enjoyed by residents throughout the city, such as Howarth Park, a 138-acre community park, and the Luther Burbank Gardens. The city also owns, operates, and maintains the historic 17-acre Santa Rosa Rural Cemetery. Two additional parks, Spring Lake County Park (320 acres, including the 72-acre lake) and Annadel State Park (5,000 acres), are not operated by the City of Santa Rosa; however, they enhance and complement recreational opportunities available to residents in Santa Rosa (City of Santa Rosa 2009). The city also has park projects that are planned or underway, including upgrades to the Kawana Springs Community Park, Roseland Creek Community Park, Finley Community Park, Howarth and Galvin Community Parks, Dutch Flohr Neighborhood Park, Fremont Neighborhood Park, North Neighborhood Park, Martin Luther King Junior Neighborhood Park and Trail, and South Davis Neighborhood Park (Santa Rosa Recreation and Parks 2025). The closest park to the project site is the Steele Lane Park located at 130 Schurman Dr, approximately 0.6 miles south of the site.

4.12.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations pertaining to public services to serve the population growth related to the proposed project that are applicable to this analysis.

b. State Regulations

California Fire and Building Code

The State of California provides minimum standards for building design through the California Building Code (CBC), which is located in Part 2 of Title 24, California Building Standards Code, of the California Code of Regulations (CCR). The CBC is based on the International Building Code but has been amended for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. In general, commercial and residential buildings are plan-checked by local building officials for compliance with the CBC. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Code of Regulations

The California Code of Regulations, Title 5 Education Code, governs all aspects of education within the State. California State Assembly Bill 2926 (AB 2926) – School Facilities Act of 1986 – was enacted

[2] (700 acres x 1,000 residents) / 174,890 total city population = 4 acres per 1,000 residents.

by the State of California in 1986 and added to the California Government Code (Section 65995). It authorizes school districts to collect development fees, based on demonstrated need, and generate revenue for school districts for capital acquisitions and improvements. It also established that the maximum fees which may be collected under this and any other school fee authorization are $1.50 per square foot ($1.50/ft^2) for residential development and $0.25/ft^2 for commercial and industrial development.

AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the Government Code. Under this statute, payment of statutory fees by developers serves as total mitigation under CEQA to satisfy the impact of development on school facilities. However, subsequent legislative actions have alternatively expanded and contracted the limits placed on school fees by AB 2926.

As part of the further refinement of the legislation enacted under AB 2926, the passage of Senate Bill (SB) 50 in 1998 defined the Needs Analysis process in Government Code sections 65995.5-65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. SB 50 generally provides for a 50/50 State and local school facilities match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available; whether the school district is eligible for State funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

California Government Code sections 65995-65998 sets forth provisions to implement SB 50. Specifically, in accordance with section 65995(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization…on the provision of adequate school facilities." The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

California Education Code section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

State Public Park Preservation Act (California Public Resource Code Section 5400 – 5409)

The State Public Park Preservation Act is the primary instrument for protecting and preserving parkland in California. The Act sets forth certain requirements for the transfer of property in use as a public park for any non-park use.

Quimby Act (California Government Code Section 66477)

The Quimby Act allows cities and counties to adopt park dedication standards/ordinances requiring developers to set aside land, donate conservation easements, or pay fees towards parkland when property is subdivided.

c. Local Regulations

Sonoma County General Plan 2020

The Public Facilities and Services Element of the 2020 General Plan contains the following goals, objectives, and policies related to public services.

Goal PF-2: Assure that park and recreation, public education, fire suppression and emergency medical, and solid waste services, and public utility sites are available to the meet future needs of Sonoma County residents.

Objective PF-2.1: Provide an adequate supply and equitable geographic distribution of regional and local parks and recreation services based on population projections.

Objective PF-2.2: Use the National Recreation and Parks Administration (NRPA) standards as the minimum standards for determining park needs.

Objective PF-2.6: Integrate fire protection systems into new structures as a means of improving fire protection services through adoption of a County ordinance.

Objective PF-2.8: Continue to coordinate fire protection services and planning with all other related agencies.

Policy PF-2a: Plan, design, and construct park and recreation, fire and emergency medical, public education, and solid waste services and public utilities in accordance with projected growth, except as provided in Policy LU-4d.

Policy PF-2b: Work with the Cities to provide park and recreation, public education, fire and emergency medical, and solid waste services as well as public utilities. Use proposed annexations, redevelopment agreements, revenue sharing agreements, and the CEQA process as tools to ensure that incorporated development pay its fair share toward provision of these services.

Policy PF-2c: Use the following standards for determination of park needs: Twenty acres of regional parks per 1,000 residents countywide and five acres of local and community parks per 1,000 residents in unincorporated areas. A portion of State parklands may be included to meet the standard for regional parks.

Policy PF-2k: Assist school districts in estimating the amount, rate and location of projected population growth within their attendance areas.

Policy PF-2l: Continue to implement State law pertaining to school impact mitigation that allows for the dedication of land, the payment of fees, or both, as a condition of approval for development projects.

Policy PF-2n: Require prior to discretionary project approval written certification that fire and related services customarily provided to comparable uses are available or will be available prior to occupancy for projects within the service area of the applicable fire agency.

City of Santa Rosa General Plan 2050

The Santa Rosa General Plan 2050 is not applicable to the project. However, for informational purposes, the following goals and policies of the Santa Rosa General Plan are related to public services and recreation:

Fire and Police Protection Goal and Policies

The Safety, Climate Resilience, Noise, and Public Services and Facilities Element of the 2050 General Plan contains the following goal and policies related to fire and police protection.

Goal 5-11: Provide efficient and effective police and fire services for all members of the community.

> **Policy 5-11.1:** Increase investments in community safety.
>
> **Policy 5-11.2:** Focus policing efforts on community-based solutions.

Schools Goal and Policies

The Safety, Climate Resilience, Noise, and Public Services and Facilities Element of the 2050 General Plan contains the following goal and policies related to schools.

Goal 5-10: Help provide superior and lifelong educational opportunities for all community members.

> **Policy 5-10.1:** Continue City/school partnerships to support a safe learning environment and high-quality educational opportunities for all members of the community, especially children, youth, and seniors.
>
> **Policy 5-10.2:** Support the ability of physical library facilities and online platforms to meet the needs of the community.

Parks and Recreational Facilities Goals and Policies

The Health, Equity, Environmental Justice, and Parks Element of the 2050 General Plan contains the following goal and policies related to parks and recreational facilities.

Goal 6-7: Create a safe, accessible, equitable Recreation and Parks System for all users.

> **Policy 6-7.1:** Work to ensure adequate funding to keep parks safe, attractive, and responsive to community needs, including funding for park acquisition, planning, capital improvements, lifecycle replacement of amenities, recreation programming, recreation centers, and maintenance operations.
>
> **Policy 6-7.2:** Provide equitable access to park resources across the city.
>
> **Policy 6-7.3:** Preserve the basic function of City-owned parks as public open spaces and prevent parkland conversion to other land uses.
>
> **Policy 6-7.4:** Plan for and provide an equitable supply and variety of parkland to serve the city's current and future residents.
>
> **Policy 6-7.5:** Ensure high-quality design and construction of new parks and park improvements that are sensitive to the natural environment, respectful of historic structures and important cultural landscapes, responsive to the needs of people of all ages and abilities, and compatible with surrounding land uses.
>
> **Policy 6-7.6:** Ensure high-quality design and construction of new parks and park improvements that are sensitive to the natural environment, respectful of historic structures and important cultural landscapes, responsive to the needs of people of all ages and abilities, and compatible with surrounding land uses.
>
> **Policy 6-7.7:** Manage City parklands to provide safe and welcoming places.
>
> **Policy 6-7.8:** Provide and promote a balanced recreation system offering a variety of quality social activities and recreational opportunities for all community members.

Recreation and Parks Business and Strategic Action Plan

Although not applicable to the project, in 2008, the City of Santa Rosa developed the Santa Rosa Recreation and Parks Business and Strategic Action Plan to identify and assess current and anticipated parks and recreation needs and priorities; provide practical and strategic direction for meeting these needs; and prepare a financial plan for the financing and funding of parks and facilities. This plan outlines several goals and objectives (City of Santa Rosa 2008):

Goal 1: Park Development Standards

Strategy 1.2: Pursuant to the General Plan, apply the standard of six acres of parkland per 1,000 residents to all development projects and ensure the following allocation is met:

- 3.5 acres of parkland designated as city parks
- 1.4 acres of parkland as accessible school recreational land; and
- 1.1 acres of public serving open space.

Strategy 1.3: Redefine access to park and public spaces for all residents to meet the following:

- within ¼ mile to public plazas and gathering spaces;
- within ½ mile to neighborhood parks; and
- within 1 mile to community parks.

Goal 4: Facilities

Strategy 4.2: Continue ongoing efforts to locate new facilities throughout the community and not concentrated in one planning area.

Strategy 4.3: Provide a balance of new facility types in all recreation and park planning area.

Goal 5: Connectivity

Strategy 5.1: Add trails and pathways to connect destinations throughout the city such as schools, libraries and parks.

Strategy 5.3: Integrate corridors and pathways into overall community design, planning and development decisions.

Strategy 5.4: Encourage new development to include a system of internal trails and pathways within developments and identify opportunities to connect with established trails and pathways.

4.12.3 Impact Analysis

a. Significance Thresholds and Methodology

Methodology

The assessment of potential environmental impacts related to public services is based on a qualitative analysis of how future development under the proposed project would impact the provision of public services in the associated service areas.

Significance Thresholds

The following discussion describes the methodology used to evaluate the significance of impacts to public services and recreation from population growth facilitated by the proposed project. According to Appendix G of the *CEQA Guidelines*, impacts related to public services and recreation from implementation of the proposed project would be significant if it would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other objectives for any of the public services:
   a. Fire protection;
   b. Police protection;
   c. Schools;
   d. Parks; or
   e. Other public facilities;
2. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
3. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impacts related to thresholds 1(a), 1(b), 1(c), 1(d), 2 and 3 are analyzed below. Impacts related to other public facilities (Threshold 1(e)) such as water, wastewater and landfills are addressed in Section 4.14, *Utilities and Service Systems*.

This analysis considers the *CEQA Guidelines* Appendix G thresholds, as described above, in determining whether the proposed project would result in impacts related to the provision of public services and recreation. Public services information was acquired through review of relevant documents. The determination that the proposed project would or would not result in substantial adverse effects concerning public services considers the applicable policies and regulations established by State, regional, and local agencies, the proposed project's compliance with such policies, and whether the proposed project would create the need for new or expanded facilities, the construction of which could result in environmental impacts.

In *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, the Court of Appeal held that significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate: "[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city. (Cal. Const., art. XIII, § 35, subd. (a)(2) ["The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services."].) Thus, the need for additional fire and police protection services is not an environmental impact that CEQA requires a project proponent to mitigate but may require a city to address.

b. Impact Analysis and Mitigation

Threshold 1a:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-1 THE PROPOSED PROJECT WOULD RESULT IN AN INCREASE IN THE NUMBER OF EMPLOYEES AND RESIDENTS. THIS WOULD INCREASE DEMAND FOR FIRE PROTECTION SERVICES, WHICH COULD RESULT IN THE NEED FOR NEW OR EXPANDED FIRE PROTECTION FACILITIES. NONETHELESS, WITH COMPLIANCE WITH EXISTING STATE AND LOCAL REGULATIONS, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Fire protection services to the project site are provided by SRFD which operates 10 fire stations. The closest fire station to the project site is Fire Station 11 located at 550 Lewis Road approximately 0.7 miles east of the project site.

Office Site

The proposed project would replace five aging County office buildings totaling approximately 185,500 square feet with a new consolidated office building with a maximum square footage of 250,000 square feet and a 7,000 to 13,000 square foot Emergency Coordination Center (ECC). The consolidation of office space would reduce the number of office buildings on the site while accommodating a slight increase of approximately 18 employees. The increase in 18 employees would not substantially increase demand for fire service. In addition, the proposed project would promote infill development which would replace older buildings with newer structures built to current Fire Code standards that would be more fire resilient. The project would also continue to be served by the existing Fire Station 11 located approximately 0.7 miles east of the project site. Development on the project site would be required to comply with abatement of fire-related hazards and pre-fire management prescriptions as outlined under the California Health and Safety Code and the California Fire Plan. Typical fire-related requirements included in these codes include:

- Adequate marking of exterior building openings
- Openings and fire escape stairs and balconies
- Internal access, including via hallways and doorways
- Manual and automatic fire alarm systems
- Fire Fighter Air Replenishment Systems
- Internal building sprinkler systems
- New fire hydrants
- External fire protection (setbacks, fire-resistant materials, etc.)

The project would be subject to the County's Fire Safety Ordinance and the California Fire Code pursuant to Chapter 13 of the Sonoma County Code of Ordinances, which includes minimum fire safety and fire prevention standards, as well as subject to review and approval of fire-related components by the SRFD prior to building permit and final inspection by PRMD. Furthermore, the continued implementation of objectives and policies in the County's 2020 General Plan would ensure adequate fire services to accommodate the future increase in population. Specifically, Objective PF-2.8 and Policy PF-2b call for ongoing coordination of fire protection services and

planning with agencies such as the SRFD; Policy PF-2a requires that fire service planning and construction align with anticipated growth; and Policy PF-2n requires written certification confirming the availability of fire services prior to occupancy as a condition of discretionary project approval.

Residential Site

The residential site could potentially include 1,500 units and approximately 20,000 square feet of retail/commercial space, which would result in approximately 3,735 new residents.[3] In addition, the retail/commercial component would generate approximately 32 employees, as well as customers and service activity, which would incrementally increase demand for fire protection and emergency medical services. This increase in population, employees, and visitors could increase demand for services such that additional staff, equipment, or facilities would be needed to meet the SRFD's response time goal of under 5 minutes. However, this increase in population has already been accounted for in the SRFD's Staffing Study which estimates population growth in Santa Rosa to average 0.79 percent per year through 2050. In addition, the City of Santa Rosa's General Plan 2050 identifies that the SRFD operates a network of fire stations throughout the city and, to maintain service levels as the community grows, plans to add two new fire stations and relocate two existing stations to better serve the community and accommodate future population increases. The General Plan also includes Action 5-11.6, which calls for pursuing infrastructure improvements, including new fire stations, emergency vehicles, and equipment to support continued public safety services (City of Santa Rosa 2024). Furthermore, the residential portion of the site would be served by the existing Fire Station 11 approximately 0.7 mile east of the site. As infill development within an area already served by existing fire infrastructure, the project is not expected to necessitate the construction of a new fire station. When and if the SRFD proposes a new station and identifies an appropriate site and funding, the city will analyze the fire station's environmental impacts under CEQA, evaluate the proposal's compliance with this EIR, and mitigate potential impacts as necessary. The residential site would also be subject to the State and local regulations and requirements as discussed above. Therefore, the project would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered fire protection facilities. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

[3] 1,500 units x 2.49 persons per household = 3,735 new residents (DOF 2025).

Threshold 1b:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-2 THE PROPOSED PROJECT WOULD RESULT IN AN INCREASE IN THE NUMBER OF EMPLOYEES AND RESIDENTS. THIS WOULD INCREASE DEMAND FOR POLICE PROTECTION SERVICES, WHICH COULD RESULT IN THE NEED FOR NEW OR EXPANDED POLICE PROTECTION FACILITIES. NONETHELESS, WITH COMPLIANCE WITH EXISTING LOCAL REGULATIONS, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Police protection services to the project site are provided by SRPD. The police station is located at 965 Sonoma Avenue approximately 2.7 miles southeast of the project site.

Office Site

The proposed project would replace five aging County office buildings totaling approximately 185,500 square feet with a new consolidated office building with a maximum square footage of 250,000 square feet and a 7,000 to 13,000 square foot ECC. The consolidation of office space would reduce the number of office buildings on the site while accommodating a slight increase of approximately 18 employees. The additional 18 employees would not substantially increase demand for police service. As discussed above under Section 4.12.1b, the SRPD has 256 employees, which equates to approximately 1.5 officers per 1,000 residents, which is within the nationally-accepted standard service ratio of 1.25 officers per 1,000 residents and the California standard, which ranges from 1.4-1.7 per 1,000 residents. Therefore, the proposed office site project would not create excessive demand for police services or introduce development to areas outside of normal service range that would necessitate new police protection facilities. This impact would be less than significant.

Residential Site

The project would continue to be served by the existing police station located approximately 2.7 miles southeast of the project site. The residential site could potentially include 1,500 units, which would result in approximately 3,735 new residents. In addition, the retail/commercial component would generate approximately 32 employees, as well as customers and service activity, which would incrementally increase demand for police protection services. This increase in population, employees, and visitors could result in a modest increase in demand for police protection such that additional staff, equipment, or facilities would be required. Furthermore, the increase in 3,735 residents would only slightly decrease the police service ratio from 1.5 officers per 1,000 residents to 1.4 officers per 1,000 residents, which would still be within the nationally-accepted and California standard service ratio. Commercial and retail uses are typical of urban infill development and would be located within an area already served by existing police infrastructure. Therefore, the proposed project would not create excessive demand for police services or introduce development to areas outside of normal service range that would necessitate new police protection facilities.

As infill development within an area already served by existing police infrastructure, the project is not anticipated to require the construction of a new police station. While the construction of a new police station is not proposed as part of this project, any future proposal by the SRPD to develop a new facility would undergo separate environmental review under CEQA. The environmental effects of such a facility would be evaluated at that time, including consideration of consistency with the

impacts identified in this EIR for overall project buildout. Therefore, the project would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered police protection facilities. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1c:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Impact PS-3 THE RESIDENTIAL SITE WOULD RESULT IN AN INCREASE IN POPULATION, INCLUDING SCHOOL-AGED CHILDREN SERVED BY SCHOOL DISTRICTS IN SANTA ROSA. NONETHELESS, THE PROPOSED PROJECT WOULD NOT RESULT IN THE NEED FOR NEW OR PHYSICALLY ALTERED SCHOOL FACILITIES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Office Site

The office site would include replacement of portions of the County Administration Center (CAC) to include a new office building and a new ECC but it would not include residential development that could directly increase demand for school facilities or create substantial demand for new housing. Indirect population growth derived from job creation would also be less than significant, especially since the new increase in employees would only be 18 employees over existing conditions. Therefore, the office site would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered schools. This impact would be less than significant.

Residential Site

The residential site could potentially include 1,500 units, which would result in approximately 3,735 new residents. In addition, the project would include approximately 20,000 square feet of retail/commercial space and would accommodate an increase of approximately 32 employees. As of 2024, Santa Rosa's population was made up of approximately 20.5 percent individuals under the age of 18 (U.S. Census Bureau 2025). Applying this ratio to the maximum addition of residents facilitated by the proposed project, the project would add approximately 766 school-aged (under age 18) residents[4] to Santa Rosa in a maximum population increase scenario. Nonetheless, consistent with state law (Section 65995(h) of the California Government Code, Senate Bill 50, chaptered August 27, 1998), new development would be required to pay school impact fees. Payment of developer impact fees pursuant to State law would ensure that adequate school facilities are provided to accommodate future growth.

[4] 3,735 residents x 0.205 = 766 school-aged residents.

While the City of Santa Rosa has previously identified two middle school sites and four elementary school sites in the southern portion of the city as potential locations to accommodate future students (City of Santa Rosa 2024), recent discussions within the Santa Rosa City School District regarding school closures and consolidations may affect the availability of these sites for future educational use. Furthermore, the continued implementation of objectives and policies in the Sonoma County General Plan 2020 would allow school districts to serve future development, including the proposed project. Specifically, Policy PF-2k assists school districts in estimating projected population growth within their respective areas. Therefore, the residential portion of the project would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered schools. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1d:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
Threshold 2:	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
Threshold 3:	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact PS-4 THE RESIDENTIAL SITE WOULD RESULT IN AN INCREASE IN POPULATION WHICH WOULD INCREASE DEMAND FOR PARKS AND RECREATIONAL FACILITIES. NONETHELESS, THE PROPOSED PROJECT WOULD NOT RESULT IN THE NEED FOR NEW OR PHYSICALLY ALTERED PARKS AND RECREATIONAL FACILITIES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Office Site

The office site would include replacement of portions of the County Administration Center (CAC) to include a new office building and new ECC, but it would not include residential development or generate an increase in Santa Rosa's population, which is the primary driver of increased demand for parks. The net increase in 18 employees would continue to utilize parks and recreational facilities in proximity to the project site, such as the 2.43-acre Steele Lane Park or Steele Lane Community Center. As infill development within an urbanized area with existing recreational facilities, the office site would not create demand requiring the construction or physical expansion of parks or recreational facilities. Furthermore, given the limited increase in daytime employment and the availability of existing recreational facilities in the surrounding urban area, any incremental increase in park use would be minor and would not be of a magnitude that would cause or accelerate substantial physical deterioration of those facilities.

Therefore, the office site would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered parks or recreational facilities. This impact would be less than significant.

Residential Site

The residential site could potentially include 1,500 units, which would result in approximately 3,735 new residents. In addition, the project would include approximately 20,000 square feet of retail/commercial space and accommodate an increase of approximately 32 employees which would potentially result in an indirect population growth. This increase in population would increase demand for parks and recreational facilities and would slightly decrease the City's current parks to resident ratio from 4 acres per 1,000 residents to 3.7 acres per 1,000 residents. Nonetheless, the buildout of the Residential site would be within the total City of Santa Rosa 2050 population estimate of 263,740 residents as outlined in the City of Santa Rosa's General Plan 2050 EIR, which estimated that adequate parkland would be available for all city residents. Within the 2050 General Plan timeframe, an additional 6.7 acres are in the process of becoming neighborhood parks, as well as six new parks proposed. The proposed facilities would provide sufficient parkland for the 3,735 new residents under the project.

Furthermore, the continued implementation of objectives and policies in the Sonoma County General Plan 2020 would allow parks and recreational facilities to serve future development, including the proposed project. Specifically, Objective PF-2.2 establishes the NRPA standards as minimum standards for determining park needs; Policy PF-2a plans, designs, and constructs park and recreational facilities in accordance with projected growth; Policy PF-2b requires the County to work with individual cities to provide park and recreational facilities; and Policy PF-2c outlines the standards of 20 acres of regional parks per 1,000 residents countywide and five acres of local and community parks per 1,000 residents in unincorporated areas to determine park needs.

Given that the project's population growth is anticipated and planned for, and that sufficient existing and future parkland would be available to accommodate the incremental increase in use, the project would not increase the use of existing neighborhood or regional parks or recreational facilities to an extent that would cause or accelerate substantial physical deterioration of those facilities. In addition, the project would not create demand for new or expanded parks beyond what has already been planned.

Therefore, the residential site would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered parks or recreational facilities. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.12.4 Cumulative Impacts

Cumulative development in Santa Rosa would increase demand for public services provided by the City, including fire and police protection services, schools, and parks and recreational facilities. As described in Section 3, *Environmental Setting*, cumulative development includes planned and proposed development located in Santa Rosa and surrounding areas.

Fire Protection

The geographic scope for cumulative fire protection impacts is the service area of SRFD. This geographic scope is appropriate because development facilitated by the project will increase the demand for SRFD fire protection services. Cumulative buildout in this region, including projects listed in Table 3-1, would increase the demand for fire protection services, which may require new or expanded fire protection facilities.

For this analysis, a cumulative impact would occur if growth in the service area requires physical expansion of facilities such as construction of new fire facilities that would result in adverse physical impacts. The proposed project would result in an increase in 50 net new employees (18 for the office site and 32 for the residential site), which would not substantially increase demand for fire services. However, the residential site could increase population such that there is an increase in reported incidents, leading to longer response times unless the SRFD increases staffing. As described above under Impact PS-1, with continued implementation of Sonoma County General Plan 2020 objectives and policies, as well as Fire Code requirements, it is not anticipated that a new fire station is needed to serve cumulative development in Santa Rosa. Therefore, the cumulative impacts related to fire protection facilities would be less than significant.

Police Protection

The geographic scope for cumulative police protection impacts is the SRPD service area. This geographic scope is appropriate because development facilitated by the project will increase the demand for police protection services from the SRPD. Cumulative buildout in SRPD's service area, including projects listed in Table 3-1 and shown on Figure 3-1, would increase the demand for police protection services, which may require new or expanded police protection facilities.

Cumulative impacts would occur if growth within the service area requires the construction of a new or the expansion of an existing police station that would result in significant adverse physical impacts. The proposed project would result in an increase in 50 net new employees (18 for the office site and 32 for the residential site), which would not substantially increase demand for police services. However, the residential site could increase population such that there is an increase in reported incidents, leading to longer response times unless the SRPD increases staffing. Should additional staffing be needed to serve the areas around the project site accounting for future cumulative development, staffing is reviewed each budget cycle and considers historical and current year information related to police services. Overall, although additional staffing may be needed, it is not anticipated that additional police department facilities would be needed to serve cumulative growth in the project area. Therefore, the cumulative impacts related to police facilities would be less than significant.

Schools

The geographic scope for cumulative school impacts are the nine school districts in Santa Rosa. This geographic scope is appropriate because development facilitated by the project would increase the

demand on Santa Rosa school districts services and facilities. Cumulative buildout in the school districts' boundary would increase the number of students in school districts' service area, which could require new or expanded schools.

Cumulative impacts would occur if growth within the Santa Rosa school districts would result in significant adverse physical impacts with the provisions for, or the need for, new or physically altered school facilities. Cumulative development would increase the number of children attending Santa Rosa schools. However, as stated in Impact PS-3, compliance with Senate Bill 50 would require the proposed project to pay school impact fees established to offset potential impacts on schools. Therefore, pursuant to California Government Code section 65994(h), the cumulative impact relating to school capacity would be less than significant.

Parks and Recreation Facilities

The geographic scope for cumulative parks, recreation, and other public facility impacts is the City of Santa Rosa. This geographic scope is appropriate because new residents in the project area would use parks and recreational facilities throughout the city.

Cumulative impacts to parks and recreational facilities would occur if cumulative development, and related population growth, increases the use of existing facilities such that substantial physical deterioration of those facilities would occur, or if new facilities would need to be constructed or existing facilities expanded that would have an adverse effect on the environment. Cumulative projects also would increase demand for park and recreational facilities. As discussed above under Impact PS-4, the proposed project would decrease the City's parkland ratio from 4 acres per 1,000 residents to 3.7 acres per 1,000 residents. Nonetheless, there are planned improvements to parks and recreational facilities within the city and cumulative development would be required to include public and private open space for future residents. In addition, additional funding sources under Measure M would allow the City to maintain existing or create new parks and recreational facilities. Therefore, cumulative impacts related to parks would be less than significant.

4.13 Transportation

This section presents the key assumptions, methods, and results of analysis for the transportation and circulation impacts of the proposed project. This section is based, in part, on the Transportation Impact Analysis (TIA) prepared by Fehr & Peers in June 2026. The TIA is included as Appendix B.

4.13.1 Setting

a. Existing Roadway Network

The following roadways provide local access to the project site and regional access to Santa Rosa and Sonoma County. The roadway network is illustrated in Figure 4.13-1.

- **U.S. Highway 101 (Highway 101)** is a major north-south freeway located west of the project site. It provides regional access between Sonoma County and the greater Bay Area, including Marin County and San Francisco to the south and the North Coast counties to the north. Access to the project site is provided via the Bicentennial Way interchange to the north and Steele Lane to the south.
- **State Route 12 (SR 12)** is an east-west arterial located south of the project site that provides regional connectivity between Santa Rosa, Sebastopol, and Sonoma Valley. The project site does not have direct access to SR 12 but connects to the facility via local and arterial roadways. SR 12 is designated as an Urban Principal Arterial in the Sonoma County General Plan.
- **Mendocino Avenue** is a north-south arterial forming the eastern boundary of the project site and providing access to downtown Santa Rosa and areas to the north.
- **Administration Drive** is a local roadway along the southern boundary of the project site that provides primary access to the County Administration Center and connects to County Center Drive and Mendocino Avenue.
- **Ventura Avenue** is a north-south local roadway that runs through the project site and connects to Bicentennial Way and Highway 101.
- **County Center Drive** is a north-south roadway that intersects Administration Drive near the southwestern corner of the project site and connects to Steele Lane.
- Additional local roadways serving the site include Fiscal Drive, which provides internal access within the site, Paulin Drive, which runs north-south near the project site, and Professional Drive, which connects to County Center Drive south of the site.

Motor vehicle travel within the project vicinity is influenced by the proximity of arterial roadways and Highway 101. Intersections connecting local roadways to arterial corridors may experience higher turning movements and congestion during peak travel periods.

b. Bicycle Network

Bicycle facilities in the project vicinity are classified according to the California Department of Transportation (Caltrans) Highway Design Manual and include Class I through Class IV bikeways. Existing bicycle facilities near the project site include:

- Class II bicycle lanes along Mendocino Avenue
- Class II bicycle lanes along portions of County Center Drive
- Class III bicycle routes along Administration Drive and Ventura Avenue

These facilities provide connections to the broader bicycle network within Santa Rosa and surrounding areas. The existing bicycle network in the vicinity of the project site is depicted in Figure 4.13-2.

c. Pedestrian Network

Pedestrian facilities in the project area include sidewalks, crosswalks, curb ramps, and pedestrian signals. Sidewalks are present along Mendocino Avenue and Administration Drive, although gaps exist along portions of Ventura Avenue, Fiscal Drive, and Paulin Drive.

The arrangement of buildings, surface parking, and roadway configurations within and surrounding the project site contributes to discontinuities in pedestrian circulation and indirect walking routes. Approximately 12 marked crosswalks are present within and near the project site.

Pedestrian access across Highway 101 is provided via the Steele Lane undercrossing to the south and the Bicentennial Way overcrossing to the north.

d. Transit Network

The project site is served by multiple transit providers, including Sonoma-Marin Area Rail Transit (SMART), Santa Rosa CityBus, Sonoma County Transit, and Golden Gate Transit. The transit network is shown in Figure 4.13-3.

- SMART operates regional commuter rail service in Sonoma and Marin Counties. The Santa Rosa North station is located approximately one mile west of the project site and provides connections to destinations throughout the SMART corridor.
- Santa Rosa CityBus provides local transit service, including Route 1 (Mendocino Avenue) and Route 10 (North City Connector), with stops located near the project site along Mendocino Avenue and Bicentennial Way.
- Sonoma County Transit provides regional and intercity bus service. Multiple routes operate in the vicinity of the project site, including Routes 20, 30, 30X, 44, 48, and 60, with service along Steele Lane, Mendocino Avenue, Ventura Avenue, and Administration Drive.
- Golden Gate Transit provides regional bus service connecting Sonoma County to Marin County and San Francisco. Bus stops serving Routes 101, 172, and 172X are located approximately one mile northwest of the project site.
- These transit services provide connections to residential areas, employment centers, and regional destinations.

e. Rail and Goods Movement

Trucks and other heavy vehicles frequently travel in the vicinity of the project site, particularly on the regional roadway network serving Santa Rosa and surrounding communities. Highway 101, located west of the project site, is part of the California Truck Network and accommodates regional goods movement, which identifies state highways where commercial vehicles are permitted to operate in accordance with Caltrans size and weight regulations. Mendocino Avenue also serves local freight and delivery traffic. Freight operations along the Northwestern Pacific Railroad corridor have declined substantially over the past several decades. Service was suspended following severe flood damage that occurred in the late 1990s.

Figure 4.13-1 Existing Roadway Network

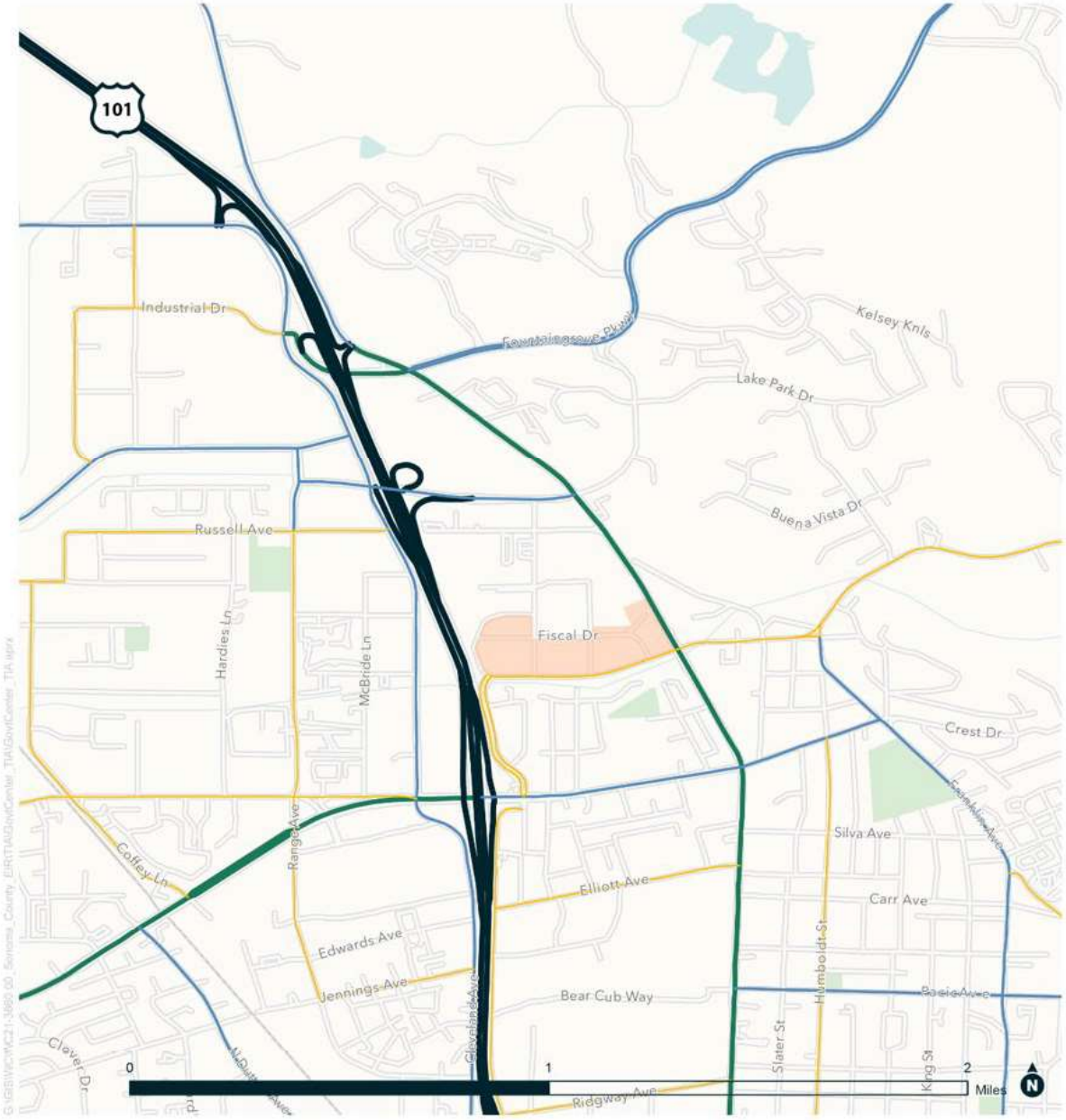


FIGURE 2
Existing Roadway Network

Fehr & Peers

Figure 4.13-2 Existing Bicycle Network



FIGURE 3
Existing Bicycle Network

Fehr & Peers

Figure 4.13-3 Existing Transit Network

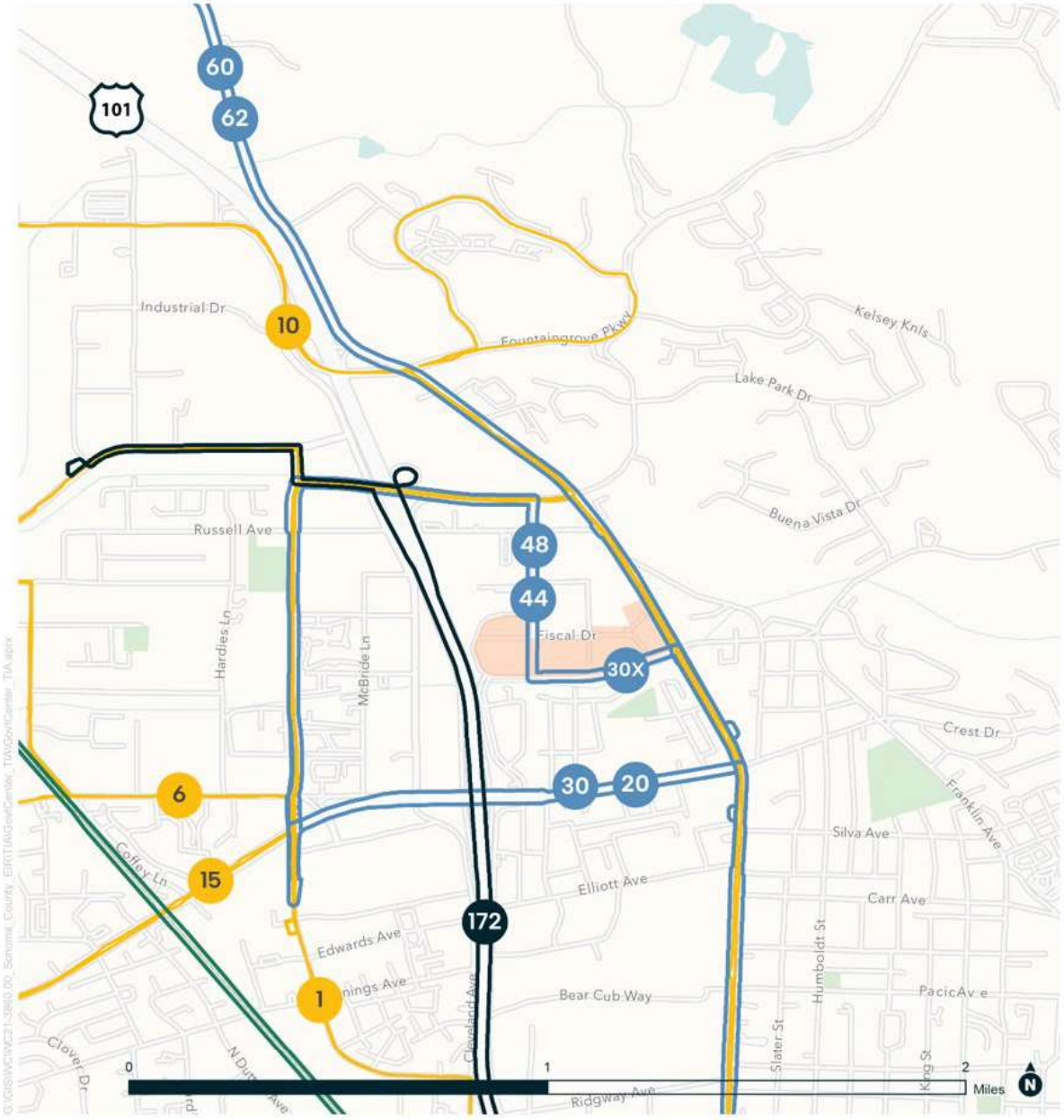


FIGURE 4
Existing Transit Network

Fehr & Peers

4.13.2 Regulatory Setting

a. Federal Regulations

Americans with Disabilities Act of 1990

The Americans with Disabilities Act (ADA) of 1990 prohibits discrimination toward people with disabilities and guarantees, among other things, that they have equal opportunities as the rest of society to become employed, purchase goods and services, and participate in government programs and services. The ADA includes requirements pertaining to transportation infrastructure. The Department of Justice's revised regulations for Titles II and III of the ADA, known as the 2010 ADA Standards for Accessible Designs, set minimum requirements for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. These standards apply to accessible walking routes, curb ramps, and other facilities.

Federal Highway Administration

The Federal Highway Administration is the agency of the United States Department of Transportation responsible for the federally funded roadway system, including the interstate highway network and portions of the primary State highway network. The Federal Highway Administration funding is provided through the Fixing America's Surface Transportation Act. Federal funds can be used to fund eligible local transportation improvements such as projects to improve the efficiency of existing roadways, traffic signal coordination, bikeways, pedestrian facilities, and transit system upgrades.

b. State

California Department of Transportation

The California Department of Transportation (Caltrans) is responsible for the planning, design, construction and maintenance of all interstate freeways and state routes, including Highway 101 and SR 12. Caltrans builds, maintains, and operates the State Highway System in California with a goal to facilitate the safe and efficient use of the state transportation system for all users. Caltrans implements federal-aid highway programs in partnership with the FHWA under a Stewardship and Oversight Agreement, through which Caltrans assumes specified project responsibilities and administers federal funds consistent with Title 23 requirements while FHWA retains ultimate oversight authority. In addition, Caltrans sets standards in its 2020 *Transportation Impact Study Guide* that focus on the vehicle miles traveled (VMT) metric. The document is intended to be a reference and informational document that aligns with the standards and thresholds established in the Governor's Office of Land Use and Climate Innovation (LCI; formerly titled the Governor's Office of Planning and Research) *Technical Advisory on Evaluating Transportation Impacts in CEQA*. This document is available to be used by local governments to uniformly review transportation analyses and assess the operational standards of Caltrans-maintained facilities. The 2020 *Transportation Impact Study Guide* acts as a replacement for the 2002 *Guide for the Preparation of Traffic Impact Studies* but is only intended to be used with local land use projects and plans, not to be used for transportation projects on the State Highway System.

California Transportation Development Act

The Mills-Alquist-Deddeh Act (Senate Bill [SB] 325) (also known as the Transportation Development Act) was enacted in 1971 to improve public transportation services and encourage regional transportation coordination. This law provides funding to be allocated to transit and non-transit related purposes that comply with regional transportation plans. The Transportation Development Act provides two funding sources: 1) the Local Transportation Fund, which is derived from a 0.25 percent of the general sales tax collected statewide, and 2) the State Transit Assistance fund, which is derived from the statewide sales tax on diesel fuel.

Senate Bill 743 and Related Regulatory Framework

Senate Bill (SB) 743, which was signed into law in 2013, directed LCI to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics instead of traffic level of service. SB 743 requires the new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also states that alternative measures of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." SB 743 changes the way that public agencies evaluate the transportation impacts of projects in accordance with CEQA by recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (see Pub. Resource Code, Section 21099, subd. [b][2]).

On January 20, 2016, LCI released the Revis*ed Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing SB 743,* which had been released on August 6, 2014. Of note was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines, and the updated guidelines became effective on December 28, 2018.

California Air Resources Board Scoping Plans

The California Air Resources Board (CARB) Scoping Plans are statewide climate frameworks prepared under AB 32 and updated approximately every five years. The 2017 CARB Scoping Plan informed many local SB 743 VMT significance thresholds adopted in the 2018–2021 period, including thresholds used by jurisdictions throughout Sonoma County and the City of Santa Rosa, which commonly targeted VMT reductions on the order of approximately 16.8 percent below baseline averages. In December 2022, CARB adopted the 2022 Scoping Plan, which identifies more ambitious statewide planning targets to reduce per-capita VMT by at least 25 percent below 2019 levels by 2030 and 30 percent by 2045 as part of achieving carbon neutrality by 2045.

c. Local Regulations

Plan Bay Area 2050

Plan Bay Area 2050 is a joint regional planning document overseen by the Metropolitan Transportation Commission and the Association of Bay Area Governments (ABAG). It serves as the region's Sustainable Communities Strategy (SCS) pursuant to SB 375 and the 2050 Regional Transportation Plan (preceded by Plan Bay Area 2040) and integrates four elements (Housing, Economy, Transportation, and Environment) and five guiding principles (affordable, connected, diverse, healthy, and vibrant) to manage greenhouse gas emissions and plan for future population growth. As required by SB 375, the Regional Housing Needs Allocation (RHNA) must be consistent with the SCS, aligning the region's housing distribution with the SCS land use/transportation pattern (for example, infill and transit-oriented development) that supports lower per-capita VMT.

In the Bay Area, ABAG administers RHNA in coordination with MTC's SCS so that local Housing Elements and zoning capacity reflect the growth geography set by Plan Bay Area. Most of the investments are directed toward residents of Equity Priority Communities or other systematically underserved communities. The plan envisions investment in affordable housing production and preservation, a universal basic income to support residents' essential needs, investments in means-based transit fare discounts, and subsidies to protect homes and businesses from natural hazards. Strategies within Plan Bay Area include strategies aimed at housing production, improving mobility, creating safe streets, reducing greenhouse gas emissions, and expanding access to parks and open space. As the SCS, Plan Bay Area guides local jurisdictions such as the County of Sonoma in developing land use and transportation plans that support infill development, transit-oriented development, and reduced per-capita VMT, as well as inform local implementation of SB 743 and related VMT practices within a consistent regional context.

Sonoma County Transportation and Climate Authority

The Sonoma County Transportation and Climate Authority (SCTCA) serves as the countywide Congestion Management Agency and is responsible for regional transportation planning, coordination, and programming of federal, state, and local transportation funds. SCTCA maintains the Sonoma County Travel Model, the regional travel demand model used by the County for CEQA analyses to estimate future travel patterns, VMT, and multimodal accessibility. The model provides a consistent regional forecast framework that aligns with Plan Bay Area and supports the City's evaluation of land use, transportation investments, and VMT reduction strategies as required under SB 743.

Sonoma County General Plan

The County General Plan was adopted by the Sonoma County Board of Supervisors Resolution 08-0808 on September 23, 2008. The County General Plan includes broad goals and policies applicable to transportation.

Goal CT-1: Provide a well integrated and sustainable circulation and transit system that supports a city and community centered growth philosophy through a collaborative effort of all the Cities and the County.

> **Policy CT-1k:** Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability.

Policy CT-1m: Require development projects contribute a fair share for development of alternative transportation mode facilities, including pedestrian and bicycle facilities along project frontages and links from these to nearby alternative mode facilities. Development near urban boundaries should provide safe access to the urban area

Goal CT-2: Increase the opportunities, where appropriate, for transit systems, pedestrians, bicycling and other alternative modes to reduce the demand for automobile travel.

Policy CT-2f: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system.

Goal CT-3: Establish a viable transportation alternative to the automobile for residents of Sonoma County through a safe and convenient bicycle and pedestrian transportation network, well integrated with transit, that will reduce greenhouse gas emissions, increase outdoor recreational opportunities, and improve public health.

Policy CT-3b: Use the policies of the Bikeways Plan whenever reviewing development projects to insure that projects are consistent with the Bikeways Plan and incorporate necessary bicycle and pedestrian improvements identified in the Bikeways Plan as a condition of project approval.

Policy CT-3h: Develop a Level of Service standard for identifying performance of the bicycle and pedestrian transportation network that takes into consideration travel distance, potential bicycle and pedestrian transportation needs, potential for improved mode split with improved facilities, and existing network deficiencies.

Policy CT-3i: Use the Level of Service standard developed by Policy CT-3h to evaluate impacts to bicycle and pedestrian facilities that may result from discretionary projects, and identify corrections and/or improvements necessary to mitigate those impacts.

Sonoma County Climate Action Plan

The Sonoma County Climate Action Plan was adopted in 2020 by participating jurisdictions, including Sonoma County, and establishes strategies to reduce GHG emissions consistent with state targets (e.g., 1990 levels and beyond). The Climate Action Plan identifies transportation as a major emissions sector and includes measures such as increasing transit use, supporting zero-emission vehicles, expanding active transportation networks, and reducing VMT through land use coordination.

Sonoma County Bicycle and Pedestrian Plan

The Sonoma County Bicycle and Pedestrian Plan establishes goals, objectives, and policies to guide the development and improvement of bicycle and pedestrian facilities within unincorporated areas of the County. The following goals and policies are relevant to transportation impacts:

Goal: Establish a viable transportation alternative to the automobile for residents of Sonoma County through a safe and convenient bicycle and pedestrian transportation network, well integrated with transit, that will reduce greenhouse gas emissions, increase outdoor recreational opportunities, and improve public health.

Policy 1.02: Use the policies of the Bikeways Plan whenever reviewing development projects to insure that projects are consistent with the Bikeways Plan and incorporate necessary bicycle and pedestrian improvements identified in the Bikeways Plan.

Policy 2.14: Refer the following projects to the BPAC to review consistency with the Bikeways Plan and to evaluate potential for creating hazards or barriers to walking or bicycling:

1. Road widening projects
2. Road capacity improvement projects.
3. Resurfacing, restoration, and/or rehabilitation of roads with existing or proposed Class II or Class III bikeways.
4. Resurfacing, restoration, and/or rehabilitation of roads that include the installation of rumble strips, AC berms or similar barriers, and/or roadway dots in the shoulder area.
5. Traffic calming improvements.
6. Discretionary projects adjacent to existing or proposed Class I bikeways and/or roads with existing or proposed Class II or Class III bikeways.
7. Discretionary projects anticipated to be conditioned with roadway improvements along existing or proposed Class I, II or III bikeways.

Policy 2.19: Require mitigation either through in-lieu fees, or development of alternative facilities that have been recommended by the BPAC, when development projects or road improvements are anticipated to result in a loss of existing bicycle and pedestrian facilities or jeopardize development of future facilities identified in the Bikeways Plan.

Policy 2.21: Require road construction projects to minimize their impacts on bicyclists and pedestrians through the proper placement of construction signs and equipment and by providing adequate, safe, well marked detours. Where it is safe to do so, allow bicyclists and pedestrians to pass through construction areas in order to avoid detours. Where two-way bicycle and pedestrian travel can be safely accommodated in a one-way traffic control zone, adequate signage shall be placed to alert motorists of bicycles and pedestrians in the lane.

Policy 2.27: Provide adequate bicycle parking as part of all new school, public transit stops, public facilities, and commercial, industrial, and retail development. Retrofit of existing uses and facilities is recommended whenever feasible.

Policy 4.06: Require discretionary projects within the Urban Growth Boundary or Sphere of Influence of a city to provide sidewalks consistent with city design standards.

Policy 4.09: Require development projects in Urban Service Areas and unincorporated communities that conflict or interfere with development of future planned pedestrian facilities to provide development of equivalent facilities within the same area.

Santa Rosa General Plan 2050

Though not applicable to the project, the following objectives and policies of the Santa Rosa General Plan are applicable to transportation in the city limits:

Goal 3-1: Provide an integrated land use and transportation system with safe and efficient movement of people and goods for all modes of travel that prioritizes reduction of VMT and transportation-related GHG emissions.

Policy 3-1.1: Work with partner agencies to reduce VMT using existing techniques and explore feasibility of new techniques as they arise.

Policy 3-1.3: Work Promote land use, development, and transportation demand management (TDM) strategies that reduce VMT and dependence on single occupancy vehicle trips.

Goal 3-2: Provide a safe and accessible active and public transportation network that emphasizes active transportation connections and service to Equity Priority Areas and Areas of Change.

Policy 3-2.2: Continue to expand and improve the active transportation network toward completing a safe, continuous, convenient, and attractive network of designated routes that connect all neighborhoods and that is equitably accessible for all ages and abilities.

Policy 3-2.4: Identify, preserve, and enhance City-designated scenic roads throughout Santa Rosa in both rural and developed areas, to encourage bicycle commuting and recreation.

Policy 3-2.5: Address traffic volumes and speeds in neighborhoods to reduce cut-through traffic and promote use of existing low-stress streets for active transportation travel.

Goal 3-3: Transition away from single-occupancy vehicles.

Policy 3-3.4: Provide convenient, efficient transit routes to major employment, education, recreation, community, and shopping centers throughout the city, SMART stations, and shopping centers.

Goal 3-4: Mitigate the traffic-related impacts of new land uses**.**

Policy 3-4.1: Ensure that new development does not impede efficient, safe, and free-flowing circulation for all traffic modes.

Policy 3-4.2: In areas other than the downtown, strive to meet intersection LOS D to maintain adequate operation of the street network and minimize cut through traffic on residential streets.

4.13.3 Impact Analysis

a. Methodology

The analysis presented herein is derived primarily from a TIA prepared by Fehr & Peers for the project in June 2026. The TIA is included as Appendix B.

As described above in 4.13.2, *Regulatory Setting,* SB 743 and *CEQA Guidelines* Section 15064.3 establish VMT as the appropriate metric for evaluating transportation impacts. The TIA estimates project-generated VMT using the Sonoma County Transportation and Climate Authority's Travel Demand Model (SCTA Model). Consistent with the Governor's Office of Land Use and Climate Innovation (LCI) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (2018), the analysis applies screening criteria and evaluates individual land use components of the mixed-use project independently.

A project can be screened from a formal VMT analysis if certain criteria are met that would signify that a project would be presumed to result in a less-than-significant CEQA transportation section impact with respect to VMT. LCI's *Technical Advisory on Evaluating Transportation Impacts* (December 2018) provides the following guidance for determining whether a project's impact on

VMT could be presumed to be less than significant if the project meets at least one of the following criteria:

- Small Projects: Projects that generate or attract few trips (estimated by LCI to be fewer than 110 trips per day).
- Map-Based Screening for Residential and Office Projects: Projects located in areas with low VMT per the SCTA model and related thresholds of significance, and that incorporate similar features.
- Near Transit Station: Project within one-half mile of an existing major transit stop or an existing stop along a high-quality transit corridor (per the Public Resources Code). Additional project design criteria must be met in order to meet screening under this criteria.
- Affordable Housing: Projects with 100 percent affordable housing in infill locations
- Local-Serving Retail: small retail projects (estimated by OPR to be less than 50,000 square feet) as presumed to be local-serving and thus screened from analysis.

Screening requires project-specific substantial evidence to support the LCI thresholds identified above.

To supplement the model-based analysis, a map-based review of VMT efficiency was conducted using the Fehr & Peers VMTIndex tool. The VMTIndex is derived from regional travel demand model outputs and represents the ratio of modeled VMT at a specific location to the regional average VMT. The VMTIndex reflects existing travel behavior associated with a location, influenced by land use patterns, proximity of housing to employment and services, and access to multimodal transportation options. Areas with lower VMTIndex values are generally associated with more compact, mixed-use development patterns and improved accessibility, which tend to reduce vehicle travel distances. In this analysis, the VMTIndex is used as supporting evidence to characterize the relative VMT efficiency of the project location.

LCI's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (April 2018) advises that lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included. This is the approach followed by other North Bay agencies, including the City of Santa Rosa. Alternatively, a lead agency may consider only the project's dominant use. Based on local precedents, each component of the project was analyzed independently.

The analysis also considers other transportation topics, including pedestrian, bicycle, transit, and emergency access, based on applicable General Plan policies. These topics are evaluated qualitatively.

Consistent with SB 743, level of service (LOS) is not used to determine the significance of transportation impacts. However, the TIA (Appendix B) includes an operational analysis for informational purposes.

b. Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, impacts related to transportation and circulation from the proposed project would be significant if the project would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
2. Conflict or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b),

3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and/or
4. Result in inadequate emergency access.

Threshold 1:	Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH ADOPTED TRANSPORTATION PLANS, ORDINANCES, OR POLICIES RELATED TO ROADWAY, PEDESTRIAN, BICYCLE, OR TRANSIT FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project

Transit

The project site is served by Sonoma County Transit and Santa Rosa CityBus and is located approximately one mile from the SMART Santa Rosa North station. Multiple transit routes operate along Mendocino Avenue, Ventura Avenue, and Administration Drive in the vicinity of the site. While the proposed project may increase transit demand, this increase is not expected to exceed the capacity of existing services. The project is consistent with Sonoma County General Plan Policies CT-1k and CT-2f, which promote development patterns that reduce vehicle miles traveled (VMT) and support transit accessibility. By concentrating housing, employment, and services in a centralized location with access to multiple transit routes, the project would support transit use and reduce reliance on single-occupant vehicles. The project does not include features that would disrupt or conflict with existing or planned transit facilities. Therefore, impacts would be less than significant.

Roadways

The project site is accessible via a network of local and arterial roadways, including Administration Drive, Ventura Avenue, Mendocino Avenue, and connections to Highway 101 via Bicentennial Way and Steele Lane. The proposed project would maintain and utilize these existing connections and would not degrade access to the surrounding circulation system. The project is consistent with Sonoma County General Plan Goal CT-1, which supports a well-integrated circulation network. The project would maintain connectivity and does not introduce design features that would impair circulation. Therefore, impacts would be less than significant.

Bicycle Facilities

Existing bicycle facilities include Class II bicycle lanes along Mendocino Avenue and County Center Drive and Class III routes along Administration Drive and Ventura Avenue. The proposed project would retain these facilities and enhance on-site bicycle circulation and connectivity. The project is consistent with the Sonoma County Bicycle and Pedestrian Plan and General Plan Policy CT-3b, which require incorporation of bicycle improvements into development projects. By improving internal circulation and strengthening connections to the surrounding network, the project would support safe and convenient bicycle travel. Furthermore, the project proposes no changes to existing off-site (i.e., on-street) bicycle facilities and would not interfere with planned bicycle facilities; therefore, the project proposes no features that would be hazardous to cyclists' travel and does not conflict with any bicycle facilities plans or programs. Therefore, impacts would be less than significant.

Pedestrian Facilities

Existing pedestrian facilities in the project area include sidewalks along Mendocino Avenue and Administration Drive, with gaps along Ventura Avenue, Fiscal Drive, and Paulin Drive. The proposed project would introduce a network of on-site pedestrian pathways and sidewalks connecting buildings and adjacent areas, thereby improving internal circulation and overall connectivity. The project is consistent with Sonoma County Bicycle and Pedestrian Plan Policies 1.02 and 4.06 and General Plan Policies CT-2f and CT-3b, which promote pedestrian improvements and connectivity. By providing new and enhanced pedestrian facilities and connections to adjacent streets, the project would help address existing gaps and support safe and convenient pedestrian access. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2 THE PROPOSED PROJECT WOULD NOT RESULT IN A SUBSTANTIAL INCREASE IN VEHICLE MILES TRAVELED AND WOULD BE CONSISTENT WITH CEQA GUIDELINES SECTION 15064.3(B). IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Consistent with LCI guidance, individual land use components of the mixed-use project are evaluated separately.

Overall Project

Project Travel

Project travel characteristics were evaluated based on trip generation, trip distribution, and trip assignment, as described in the Transportation Impact Analysis (Appendix B). Trip generation was estimated using the Institute of Transportation Engineers (ITE) Trip Generation Manual for office, residential, and retail land uses. Internal trip capture associated with the mixed-use nature of the project was also considered; however, as a conservative assumption, reductions associated with alternative mode use (e.g., walking, bicycling, and transit) were not applied.

After accounting for internal trip capture and replacement of existing office uses, the project is estimated to generate approximately 7,267 weekday daily trips, including 625 AM peak hour trips and 632 PM peak hour trips, as shown in Table 4.13-1. These trips reflect the introduction of residential and retail uses as well as the consolidation of County office uses. The proposed project would accommodate approximately 1,200 employees, representing an increase of approximately 18 employees compared to existing conditions. As a result, the office site would generate a negligible change in overall travel demand relative to existing conditions.

Table 4.13-1 Project Trip Generation

Land Use	Quantity	AM Peak Hour	PM Peak Hour
Office	250,000 sf	310	295
Residential	1,500 du	622	570
Commercial/Retail	20,000 sf	79	126
Total Raw Trip Generation		1,011	991
Reductions			
Internal Capture	-	-76	-64
Existing Office Building		-310	-295
Net Total Project Trips		625	632

Source: Appendix B

sf = square feet; du = dwelling units

Retail/Commercial Component

As described in Section 4.13.3, *Methodology*, the LCI Technical Advisory allow screening of local-serving retail uses from detailed VMT analysis. The proposed retail/commercial space of the residential site consists of approximately 20,000 square feet integrated within a mixed-use development that includes residential and office uses. The retail/commercial space is intended to primarily serve residents, employees, and visitors to the project site and surrounding area.

Due to its relatively small size and its location within a mixed-use campus, a portion of trips associated with the retail/commercial space would be expected to be internal to the project site or diverted from existing nearby trips rather than generating entirely new vehicle travel. In addition, retail uses of this scale typically serve local demand and are associated with shorter trip lengths compared to regional-serving retail uses.

The integration of retail within a compact, mixed-use development also supports opportunities for walking, bicycling, and other non-automobile modes of travel. These characteristics would limit the potential for increases in VMT attributable to the retail/commercial space.

Overall, the retail/commercial space represents a small portion of the total project and would account for a limited share of total project-generated travel. As such, the retail/commercial component would not result in a substantial or measurable increase in vehicle miles traveled, and the impact would be less than significant.

Residential Component

As discussed within Appendix B, the latest SCTCA Travel Demand Model was used as the basis of estimating project VMT per capita. LCI guidance sets VMT significance thresholds at 15 percent below regional averages, where “regional” refers to the Metropolitan Planning Organization region (MTC for the nine-county Bay Area), which extends beyond the SCTCA model area; therefore, MTC’s Travel Model Two is used to establish these thresholds. This two-model approach, previously applied in the County’s 2023 Housing Element Update, has been considered conservative for project-level VMT estimation by SCTCA transportation planning staff.

Table 4.13-2 presents the project’s estimated home-based VMT per resident compared to the applicable threshold.

Table 4.13-2 Project Total Home-Based VMT per Resident Estimates

Metric	Model Base Year	2025 Interpolated CEQA Baseline	Model Cumulative Year
Project	8.55	8.42	8.08
Regional Average	12.20	11.34	9.20
CEQA Threshold	-	9.64	-

Source: Appendix B

As shown in Table 4.13-2, the project's total home-based VMT per resident under baseline plus project conditions would be 8.42 VMT per resident, which is below the threshold of 9.64 (15 percent below the regional average of 11.34) (Appendix B). Therefore, the residential component would result in a less-than-significant impact to VMT.

Office Site

The proposed office component of the project represents a consolidation and modernization of existing County government facilities at the project site. The project would increase total on-site employment from approximately 1,182 to 1,200 employees, resulting in a net increase of approximately 18 employees or approximately 1.5 percent above existing conditions. This incremental increase in employment would result in a minor increase in daily vehicle trips relative to existing conditions. Furthermore, this increase is negligible in the context of both the existing site and the overall project and would not meaningfully change travel behavior or travel patterns associated with the site. The project would continue to function primarily as a County government campus, and the characteristics of commute trips to and from the site would remain substantially similar to existing conditions.

In addition, the incremental trips associated with the net increase in employees represent a very small fraction of total project-generated vehicle trips (less than one percent). As such, the office component does not materially contribute to the project's overall VMT and does not affect the outcome of the residential VMT analysis, which is the primary driver of project VMT.

As discussed in Appendix B, a review of the project site indicates that the site is located in an area characterized by VMT levels below the regional average. Development in these areas is typically associated with shorter trip lengths and reduced vehicle miles traveled due to proximity to jobs, services, and multimodal transportation options. Consistent with these characteristics, the project site's location supports travel patterns that are already below regional average VMT levels. Therefore, the incremental increase in office employment would occur in a context where VMT efficiency is relatively high, further supporting the conclusion that the office component would not result in a substantial or measurable increase in VMT.

Based on the above, the office component would not result in a substantial or measurable increase in vehicle miles traveled relative to existing conditions. Therefore, the office component would not result in a substantial increase in VMT and is presumed to have a less-than-significant impact.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3:	Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Impact TRA-3 THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY INCREASE TRAFFIC HAZARDS DUE TO ROADWAY GEOMETRY OR INCOMPATIBLE USES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project

The proposed project would provide access to the public circulation system via Administration Drive, Ventura Avenue, Fiscal Drive, Paulin Drive, and Mendocino Avenue, including one new driveway on Mendocino Avenue. All access points would be designed with appropriate traffic controls and turning restrictions consistent with roadway geometry, operating speeds, and visibility requirements. Final design would be subject to applicable engineering standards and review by responsible agencies.

Posted speed limits in the project vicinity are 25 miles per hour on local roadways (Administration Drive, Ventura Avenue, Paulin Drive, and Fiscal Drive) and 35 miles per hour on Mendocino Avenue. Based on Caltrans Highway Design Manual guidance, minimum stopping sight distances for these speeds are approximately 150 feet and 250 feet, respectively. Sight distances along adjacent roadway segments meet or exceed these standards; the adequacy of sight distance at project access points would be confirmed during final design (Appendix B).

Although internal circulation design has not yet been finalized, on-site drive aisles and access points would be constructed to meet applicable design standards, including adequate widths and throat depths to accommodate vehicle maneuvering and queuing. Project access and internal circulation would be subject to review and approval by applicable agencies, including emergency service providers.

Based on the proposed site plan and adherence to applicable design standards, the project would not introduce hazardous roadway design features, such as sharp curves, inadequate sight distance, or unsafe access configurations. The project also would not interfere with emergency access or create conditions that would substantially increase hazards for motorists. Therefore, the project would not result in a substantial increase in hazards due to geometric design features or incompatible uses.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4: Would the project result in inadequate emergency access?

Impact TRA-4 THE PROPOSED PROJECT WOULD PROVIDE ADEQUATE ACCESS FOR EMERGENCY VEHICLES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project

Adequate emergency access is determined by the number and configuration of site access points and the design of internal circulation, including roadway widths and turning radii.

The proposed project would provide multiple access points via Administration Drive, Ventura Avenue, Fiscal Drive, Paulin Drive, and Mendocino Avenue, allowing emergency vehicles to enter and exit the site from multiple directions. These access points would consist of new or modified curb cuts and internal roadways/drive aisles that would be designed to be of adequate width for emergency vehicle access. Internal roadways and drive aisles would be designed to meet applicable fire and building code requirements, including access width and turning radius standards, and would be subject to review and approval by the appropriate emergency service providers.

Santa Rosa Fire Station 11, located on Lewis Road, would likely serve the project site, with primary access via Mendocino Avenue and Administration Drive. Although the project may incrementally increase traffic volumes in the surrounding area, emergency vehicles would retain priority access and would not be substantially impeded.

Because the project includes multiple access points and would comply with applicable emergency access design standards, it would not result in inadequate emergency access. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.13.4 Cumulative Impacts

The cumulative impacts assessment area for transportation includes the City of Santa Rosa, Sonoma County, and the greater San Francisco Bay Area. This is an appropriate assessment area because regional travel behavior, VMT patterns, and transit usage extend beyond local boundaries. While some trips may originate outside the region, most trips associated with the project and cumulative development would occur within this broader regional context.

The project and other cumulative projects in the area (Table 3-1 in Chapter 3, *Environmental Setting)* would increase demand for transit, roadway, bicycle, and pedestrian facilities. Planned development within Santa Rosa and Sonoma County, including residential, commercial, and institutional uses, would increase travel demand and place additional pressure on existing transportation infrastructure. Cumulative development would also increase demand for multimodal transportation options, such as transit, bicycling, and walking. Planned improvements, such as the Highway 101 Bicycle and Pedestrian Overcrossing project, would enhance east-west connectivity across Highway 101, improve access to SMART rail and local bus service, and reduce barriers to bicycle and pedestrian travel. However, if transportation infrastructure and transit capacity do not

expand at a rate commensurate with growth, cumulative impacts to the transportation system could be significant.

As discussed under Impact TRA-1, the proposed project would not conflict with plans, policies, or programs addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The proposed project would maintain existing roadway connections, improve on-site pedestrian and bicycle facilities, and provide access to transit services. The project would also be consistent with policies promoting multimodal transportation and reduced reliance on single-occupant vehicles. Therefore, the project would have a less than significant impact.

Cumulative projects within the region would result in increased vehicle travel and VMT. Development of planned residential and commercial uses would increase total VMT compared to existing conditions. However, as discussed under Impact TRA-2, the proposed project would result in VMT per resident below the applicable threshold and would not generate a significant VMT impact. Table 4.13-3 presents the cumulative year (2040) Total Home-Based VMT per Resident estimates for the residential portion of the project, which is 8.08 VMT per resident. The regional average of 10.06 home-based VMT per resident was derived from interpolation of the base year (2015) and future year (2050) of the MTC Plan Bay Area 2050 model.

Table 4.13-3 Cumulative Total Home-Based VMT per Resident Estimates

Metric	Model Base Year	2040 Interpolated	Model Cumulative Year
Project[1]	8.55	8.08	8.08
Regional Average[2]	12.20	10.06	9.20
CEQA Threshold[3]	-	8.55	-
Significant Impact		**No**	

[1] Project home-based VMT per resident calculated using data from the SCTCA model, which has a base year of 2019 and cumulative year of 2040.

[2] Regional average home-based VMT per resident calculated using data from the MTC Plan Bay Area 2050 model, which has a base year of 2015 and cumulative year of 2050.

[3] CEQA threshold of significance calculated as 15 percent below the regional average in the 2025 interpolated CEQA baseline.

Source: Appendix X

As shown in Table 4.13-3, the project VMT would be below the CEQA threshold of 8.55 home-based VMT per resident, which is 15 percent below the regional average, and therefore this cumulative impact would be less than significant. In addition, the project's retail and office components would be screened from further VMT analysis and are presumed to have less-than-significant impacts. Therefore, cumulative VMT impacts would be less than significant and the project would have a less than significant impact.

Impacts related to design hazards and emergency access are generally site-specific and are not substantially affected by other cumulative development. As discussed under Impacts TRA-3 and TRA-4, the proposed project would not introduce hazardous roadway design features or incompatible uses and would provide adequate emergency access consistent with applicable design standards. Therefore, cumulative impacts related to hazards and emergency access would not be significant, and the project would have a less than significant impact.

4.14 Tribal Cultural Resources

The analysis in this section considers potential impacts to tribal cultural resources. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to tribal cultural resources; and potential impacts related to tribal cultural resources that would result from implementation of the proposed project.

Tribal cultural resources are those resources identified by California Native American tribes in consultation with lead agencies during tribal consultation (also referred to as Assembly Bill [AB] 52 consultation). The analysis in this section is based on the results of the County's AB 52 consultation efforts.

4.14.1 Setting

a. Ethnographic Context

The project site is located within the traditional territory of the Southern Pomo people. Southern Pomo territory includes Sonoma County, extending roughly from the coast at Gualala, east into Lake Sonoma and Cloverdale, and south covering the Russian River (McLendon and Oswalt 1978, 279; Native Land 2023). Southern Pomo territory is bordered by the Southwestern (Kashaya) to the west, the Wappo to the east, the Coast Miwok to the south, and the Central Pomo to the north (Native Land 2023). Early ethnographers have recorded Southern Pomo as one of several distinct Pomoan language groups, including the Central, Northern, Eastern, Northeastern, Southern, Southwestern (Kashaya), and Southeastern (McLendon and Oswalt 1978, 274-275). The word Pomo was taken from two Northern Pomo terms reportedly used interchangeably in English: Po'-mo, "red magnesite mine", and Po'-ma, "those who live at" or "people" (McLendon and Oswalt 1978, 277; Walker 2020, 1).

Southern Pomo society was recorded by early ethnographers as consisting of independent tribelets, or extended kin groups, ranging in size from 100 to 2,000 people led by a headman or minor chief, as part of a council of principal ruling elite. Nuclear families averaged five to six persons, and kin groups might join together to form a larger confederation for military purposes, electing one "war chief" leader (Bean and Theodoratus 1978, 293-294). Observed social status relied on family, background, wealth, and individual achievement, where individuals held professional positions requiring apprenticeships such as chieftainship, shamanic roles, doctors, bead making, hunting, and craftmaking. A highly respected and revered profession was the bear doctor, wielding special powers of healing and poisoning through religious and ritual paraphernalia.

Southern Pomo houses consisted of seasonal multifamily communal structures constructed of wooden frames and thatched with brush and grass or tule (Bean and Theadoratus 1978, 292; Walker 2020, 13-14). Other important structures include sweathouses and assembly or dance houses (Walker 2020, 14). The sweathouse, or men's house, was an earth covered conical structure. The dance house was a semi-subterranean with a center pole and smoke hole, tunnel entrance, and rear door, which averaged 70 feet in diameter (Bean and Theadoratus 1978, 293).

Southern Pomo subsistence was adapted to the environmental around them for which they based their patterns on hunting, gathering, and fishing, with acorns, grains, pepperwood nuts, and buckeyes as primary staples to be stored year round (Bean and Theodoratus 1978, 290; Walker 2020, 13). Other important plant resources included berries and seeds. Big game included bear, deer, elk, and antelope, along with smaller game including rabbits and squirrels. Material culture

included obsidian and chert tools, intricate basketry, and bone and shell implements (Bean and Theodoratus 1978, 291; Walker 2020, 14). The Southern Pomo participated in a shell bead exchange system internally and among other tribal groups (Bean and Theodoratus 1978, 298; Walker 2020, 14).

The Southern Pomo likely had their first contact with European culture upon the establishment of a settlement in California by the Russian fur traders at Fort Ross in 1811 (Kennedy 1955, 37; Walker 2020, 9). At the time of contact, the population of Southern Pomo is estimated at approximately 600 to 1,000 people in the greater Cloverdale area, with two large villages around Dry Creek comprising of 500 combined (Walker 2020, 9). Intermarriage between Russians and the Southern Pomo occurred, and the Southern Pomo language borrowed some Russian words (Walker 2020, 9-10). Spanish occupation began in 1821, and Mission Solano was established in 1823 with the forced labor of the Southern Pomo. Within a generation or two, direct conflict, slave labor, and exposure to European diseases nearly decimated them (Walker 2020, 10). In 1858, the Southern Pomo were forced onto the Round Valley reservation in Yuki territory, and in the 20th century, the Southern Pomo were granted official lands for rancherias, including Dry Creek and Graton in 1915, Mark West in 1916, Cloverdale in 1921, and Lytton in 1926/27 (Round Valley Indian Tribes 2023; Walker 2020, 12). Today, five Pomo-affiliated tribes within Southern Pomo territory are federally recognized, including the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Federated Indians Graton Rancheria, Lytton Rancheria, and Round Valley Indian Tribes of the Round Valley Reservation (NAHC 2023).

4.14.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations related to Tribal Cultural Resources applicable to the proposed project.

b. State Regulations

Assembly Bill 52

AB 52 of 2015 expanded the California Environmental Quality Act (CEQA) by defining a new resource category, "tribal cultural resources." AB 52 establishes, "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code [PRC] Section 21084.2). It further states the CEQA lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) define tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and that meets at least one of the following criteria, as summarized in *CEQA Guidelines* Appendix G:

1) Listed or eligible for listing in the California Register of Historic Resources, or 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 subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process with California Native American tribes that must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." California Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

c. Local Regulations

There are no local regulations related to Tribal Cultural Resources applicable to the proposed project.

4.14.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The evaluation of impacts to tribal cultural resources addressed in this section is based on the results of consultation between the County and the Federated Indians of Graton Rancheria (FIGR). The presence and significance of potential tribal cultural resources are determined through consultation between lead agencies and consulting California Native American tribes. Impacts to tribal cultural resources are highly dependent on the nature of the resource but, in general, could occur if the project results in the destruction or alteration of the resource or its surroundings, restricted access to the resource, or other disturbances.

On November 9, 2023, the California Native American Heritage Commission (NAHC) conducted a Sacred Lands File (SLF) search for the project area. The SLF search did not identify the presence of known tribal cultural resources within or in the vicinity of the project site. The NAHC identified a list of tribal contacts known to be traditionally and culturally affiliated with the Place of Use. The County sent AB 52 notification letters these Native American tribal contacts. Letters were sent on November 14, 2025. The 10 tribes that were contacted include the following:

- Cloverdale Rancheria of Pomo Indians
- Dry Creek Rancheria of Pomo Indians
- Federated Indians of Graton Rancheria
- Guidiville Rancheria of California
- Kashia Band of Pomo Indians of the Stewarts Point Rancheria
- Lytton Rancheria
- Middletown Rancheria
- Mishewal-Wappo Tribe of Alexander Valley
- Pinoleville Pomo Nation
- Robinson Rancheria of Pomo Indians

Under AB 52, tribes have 30 days to respond and request consultation. The County received one response for consultation from FIGR on December 31, 2025. The County and FIGR met on April 17, 2026 and May 4, 2026. The County shared project plans and information provided in the cultural resources technical report prepared for the project. FIGR requested mitigation to be incorporated to avoid impacts to tribal cultural resources.

Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, impacts related to tribal cultural resources would be significant if the proposed project would:

1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:
   a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
   b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

b. Impact Analysis and Mitigation Measures

Threshold 1:	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Impact TCR-1 NO TRIBAL CULTURAL RESOURCES WERE IDENTIFIED AS A RESULT OF THE COUNTY'S REQUIRED AB 52 CONSULTATION PROCESSES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

No tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or determined by the lead agency, in its discretion and supported by substantial evidence, to be significant were identified as a result of the County's consultation process. Though there are no known tribal cultural resources present within the project site, it is possible that ground disturbance during project construction could encounter unknown archaeological resources that may be considered tribal cultural resources by a locally affiliated California Native American Tribe. Therefore, the project has the potential to significantly impact tribal cultural resources through ground disturbance and subsequent damage of encountered resources. Implementation of Mitigation Measures TCR-1 and TCR-2 would ensure that any unanticipated discoveries of tribal cultural resources are avoided or, where avoidance is infeasible, mitigated to a less than significant level.

Mitigation Measures

TCR-1 Tribal Cultural Resources Plan

A Tribal Cultural Resources (TCR) Plan shall be required for development occurring in areas identified as potentially sensitive for tribal cultural resources during consultation with FIGR.

If the project includes ground disturbance, the TCR Plan shall include a TCR treatment plan to be implemented in the event an unanticipated archaeological resource that may be considered a tribal cultural resource is identified during construction. In the event of an inadvertent discovery of tribal cultural resources or a Native American remain or burial, the TCR Plan shall require consultation with FIGR. The treatment plan shall include any necessary monitoring requirements, suspension of all earth-disturbing work in the vicinity of the find, avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in consultation with FIGR and, if applicable, a qualified archaeologist.

Examples of appropriate treatment for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, preservation in place, protecting the confidentiality of the resource, or heritage recovery. The TCR Plan and treatment plan shall be reviewed and approved by the County and FIGR to confirm compliance with this measure prior to construction.

TCR-2 Native American Monitoring

For development occurring in areas identified as potentially sensitive for tribal cultural resources through consultation with FIGR, the project applicant shall retain a FIGR tribal monitor to observe all ground disturbance, including archaeological excavation, associated with development facilitated by the project. Monitoring methods and requirements shall be outlined in a tribal cultural resources treatment plan prepared as described above under Mitigation Measure TCR-1. In the event of a discovery of tribal cultural resources, the steps identified in the TCR treatment plan prepared under Mitigation Measure TCR-1 shall be implemented.

Significance After Mitigation

By implementing Mitigation Measure TCR-1 and TCR-2, the County would evaluate and require steps to protect or treat significant tribal cultural resources if encountered during construction, resulting in a less than significant impact.

4.14.4 Cumulative Impacts

The geographic scope for cumulative impacts related to cultural resources include the project site and the surrounding areas, including the incorporated City of Santa Rosa and the unincorporated Sonoma County lands adjacent to the City of Santa Rosa. This geographic scope is appropriate because tribal cultural resources are regionally specific and determined by the local tribes. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects.

Project implementation in conjunction with other nearby past, present and reasonably foreseeable future projects could potentially disturb areas that may contain tribal cultural resources. While there is the potential for significant cumulative impacts to tribal cultural resources, it is anticipated that potential impacts associated with individual projects would be addressed and mitigated on a

case-by-case basis and would be subject to local and State regulations regarding the protection of such resources. Additionally, as described under Impact TCR-1, mitigation would be required for development facilitated by the project related to the protection of tribal cultural resources. Therefore, the cumulative impact related to tribal cultural resources would not be considerable with mitigation, and the project would not result in a considerable contribution to cumulative impacts.

4.15 Utilities and Service Systems

This section identifies and evaluates issues related to utilities and service systems in the context of the proposed project. The section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to utilities and service systems; and potential impacts to utilities and service systems that would result from implementation of the proposed project.

4.15.1 Setting

a. Water Supply

Sonoma Water

Sonoma Water serves the cities of Cotati, Petaluma, Rohnert Park, Santa Rosa, Sonoma, Town of Windsor, Marin Municipal Water District, North Marin Water District, and Valley of the Moon Water District (Sonoma Water 2025). Santa Rosa Water is the urban water supplier for the project site. Sonoma Water is the wholesale water provider to the City, including the County-owned project site located within city limits, and supplies primarily surface water from the Russian River.

Water supply from Sonoma Water is delivered to the City of Santa Rosa through the Sonoma Water aqueduct system. The City is one of eight water contractors under a contract with Sonoma Water, known as the Restructured Agreement for Water Supply. The Restructured Agreement for Water Supply (Restructured Agreement), which was executed in 2006, generally provides for the finance, construction, and operation of existing and new diversion facilities, transmission lines, storage tanks, booster pumps, conventional wells, and appurtenant facilities (Sonoma Water 2021). The Restructured Agreement provides the contractual relationship between Sonoma Water and its eight contractors and includes quantities of water they require and at flow rates that are necessary to meet their peak day's demand subject to delivery limitations. Under the Restructured Agreement, the City of Santa Rosa receives approximately 95 percent of its potable water supply from Sonoma Water. Sonoma Water is obligated to deliver up to 29,100 acre-feet per year (AFY) of water during a fiscal year (City of Santa Rosa 2021).

Groundwater

The City's local groundwater supply is from the Santa Rosa Plain Subbasin of the Santa Rosa Valley Groundwater Basin, located at the confluence of the Santa Rosa, Bennett, and Rincon Valleys. The City of Santa Rosa produces approximately five percent of its potable water supply from groundwater wells. In July 2005, the city received permission from the California Department of Public Health (now Division of Drinking Water, or DDW) to use two groundwater wells, formerly permitted as standby emergency wells, for full-time, active potable water supply (City of Santa Rosa 2021). This supply source is permitted for regular production and can provide up to 2,300 AFY. The Santa Rosa Plain groundwater basin, which the City overlies, and its sub-basins have not been identified as overdrafted and are not anticipated to become overdrafted basins (City of Santa Rosa 2021).

The City maintains a total of six municipal groundwater wells within the Santa Rosa Plain Sub-basin of the Santa Rosa Valley Groundwater Basin. They are described as follows:

- **Farmers Lane Wells No. 1 and 2:** These two wells were changed from emergency to active status by the former California Department of Public Health (DPH) on July 20, 2005. The two wells are currently permitted by the California State Water Resources Control Board (SWRCB) DDW. These wells can provide up to 2,300 acre-feet per year (AFY) and are the City's only potable groundwater sources in active use. They have been used to supplement potable water supplies obtained from Sonoma Water, particularly during high demand periods;
- **Carley Well and Peter Springs Well:** These two wells are operated primarily to provide water for landscape irrigation to an adjacent park, refilling Lake Ralphine, and irrigation of school grounds. These wells are also permitted by DDW to operate and provide potable supply during an emergency outage condition. These wells provide the city with approximately one million gallons per day (MGD) of groundwater capacity on a stand-by emergency basis;
- **Farmers Lane Well No. 3:** This well is only operated to provide minor amounts of landscape irrigation water supply to areas adjacent to the well; and
- **Leete Well:** This well is only used to provide potable water during an emergency outage condition (as permitted by DDW). This well is currently out of service due to a casing separation.

Non-Potable Water

The City of Santa Rosa distributes recycled water for landscape irrigation within its urban water service area to 32 connections serving multi-family residential customers, commercial customers, and institutional/governmental customers. The city offsets approximately 0.7 percent of total demand for potable water in the urban system with recycled water (City of Santa Rosa 2021). The city owns and operates the Santa Rosa Regional Water Reuse System (Regional System), which produces recycled water that is approved by the State for non-potable uses. The Regional System recycles nearly all of its treated wastewater, with the majority being used for the Geysers Recharge Project. In recent years, the city's urban water system has used an average of 120 acre-feet per yet (AFY) of recycled water for landscape irrigation (2011-2020) (City of Santa Rosa 2021). The Regional System produces tertiary treated recycled water that is approved for non-potable reuse, under the authority of its National Pollution Discharge Elimination System (NPDES) Permit. The city distributes and uses this recycled water for non-potable uses (landscape irrigation) within its urban jurisdiction under the SWRCB General Order for Recycled Water Use WQ 016-0068-DDW (City of Santa Rosa 2021).

Water Distribution

Sonoma Water's infrastructure includes an extensive network of pipelines, reservoirs, and pumping stations that transport water from these sources to its customers. The water is treated at various facilities to meet safety and quality standards before distribution. Santa Rosa Water operates and maintains a potable water distribution system within the city that consists of 20 booster pump stations, 624 miles of water mains, 24 aboveground reservoirs (tanks), 6 groundwater wells, a well treatment facility, and over 54,000 service connections (City of Santa Rosa 2021). Santa Rosa Water also owns, maintains, and operates a recycled water distribution system that provides non potable water for landscape irrigation to 32 connections, including multi-family residences, commercial, and institutional/governmental customers (Sonoma Water 2021). The city's water distribution system is divided into 18 major pressure zones and serviced by 624 miles of water mains ranging in size from 4 to 24 inches (City of Santa Rosa 2021). Most connections are served by laterals that branch from 6-inch- to 12-inch diameter-water mains. Pipe materials consist of asbestos cement, polyvinyl chloride (PVC), high-density polyethylene (HDPE), ductile iron, and cement mortar lined and coated

steel. There are 59 physical connections between the city's distribution system and Sonoma Water's system, including 39 pressure-reducing valves, 16 check valves, and 4 pumping stations (Sonoma Water 2021).

Water Supply Vulnerability

The city's water supplies are rainfall replenished water supplies and have some vulnerability to climate change as outlined below.

- **Sonoma Water Supply:** At this time climate change impacts to Sonoma Water's water supply are unknown, although Sonoma Water is working with the United States Geological Survey to analyze potential long-term impacts. However, because Sonoma Water's supply is rainfall-driven, climate change is expected to affect supply in that timing of runoff is expected to become more variable. This will affect reservoir storage, especially in the spring and summer months. Annual precipitation is expected to vary with vulnerability to droughts and dry periods.
- **Groundwater:** Climate change can affect the availability and yield from groundwater aquifers. Groundwater levels in the area fluctuate depending on precipitation, aquifer recharge, and pumping. As is the case with the Sonoma Water supply, long-term studies and management plans are focused on minimizing this impact.

Water Shortage Contingency Plan

The City's 2020 Urban Water Management Plan (UWMP) includes the City's Water Shortage Contingency Plan (WSCP) which is implemented when available supplies are not sufficient to meet normal water demands. A water shortage may occur due to several reasons, such as drought, climate change, regulatory constraints, natural or human caused disasters, and catastrophic events which may occur at any time. The WSCP is the city's operating manual that allows the City Council, staff, and the public to identify and efficiently implement pre-determined steps to manage a water shortage. Sonoma Water is preparing its 2025 UWMP and intends to submit the final plan to DWR by July 1, 2026. Because the new UWMP has not been issued, the 2020 UWMP is used as the basis for evaluating water supply and contingency planning.

Trigger points for determining water shortage conditions on the Russian River system are determined by Sonoma Water, and water shortage provisions for the Sonoma Water system are governed by the Restructured Agreement (City of Santa Rosa 2021). The Restructured Agreement dictates how water supply reductions will be administered by Sonoma Water in the event of a water shortage. In addition, the City of Santa Rosa continues to implement aggressive water conservation programs and has one of the lowest per capita water uses among all of Sonoma Water's Water Contractors (City of Santa Rosa 2021). To address any future water supply shortages, the City has identified eight water shortage stages and developed corresponding demand reduction measures to address the severity of the supply restriction which are outlined within the WSCP (City of Santa Rosa 2021).

b. Wastewater Collection, Treatment and Disposal

In the City of Santa Rosa, wastewater is collected through an extensive network of over 500 miles of underground pipes. This system gathers wastewater from homes, businesses, and industries within Santa Rosa, as well as from the neighboring cities of Rohnert Park, Cotati, Sebastopol, and the South Park Sanitation District (City of Santa Rosa 2025a). The existing Santa Rosa sewer system includes approximately 600 miles of gravity sewer pipelines ranging in size from 4 to 66 inches in diameter.

The system also includes 17 wastewater pump (lift) stations, 6.4 miles of associated force mains, and the West College Storage Facility (WCSF), a wet weather diversion and storage facility located near West College Avenue and Stony Point Road (City of Santa Rosa 2023).

All wastewater generated within the City limits is ultimately conveyed to the City of Santa Rosa's Laguna Treatment Plant (LTP) at 4300 Llano Road in Santa Rosa. As discussed above, the LTP accepts wastewater from the cities of Cotati, Rohnert Park, and Sebastopol, as well as the South Park County Sanitation District. The LTP accepts hauled waste, including domestic septage, chemical toilet waste, grease trap waste, non-hazardous commercial and industrial waste, groundwater, grey water, and landfill leachate. The LTP has an average daily flow of 15.1 MGD, with an average dry weather flow of 13.6 MGD (City of Santa Rosa 2021). The plant has a design capacity of 21.3 MGD of average dry weather flow, 64 MGD of weekly wet weather flow, and 47.3 MGD of monthly wet weather flow (North Coast Regional Water Quality Control Board [RWQCB] 2020). Santa Rosa's contribution to the wastewater flow to the plant in 2022 was calculated to be about 10.6 MGD. The LTP treats wastewater to Title 22 tertiary recycled water standards. Water that leaves the system can be beneficially reused in the City of Santa Rosa's reclaimed water system and in the production of geothermal energy at the Geysers. On average, the City of Santa Rosa recycles approximately 7 billion gallons of wastewater each year. During exceptionally wet years, water is occasionally discharged to the Laguna de Santa Rosa (City of Santa Rosa 2025c).

c. Stormwater Collection and Discharge

The City of Santa Rosa owns and maintains a storm drain system that discharges into local creeks which ultimately flows into the Russian River. Stormwater discharges consist of surface water runoff generated from various land uses. The quality of these discharges varies and is affected by geology, land use, season, hydrology, and sequence and duration of hydrologic events. In the City of Santa Rosa, stormwater management involves a comprehensive system designed to prevent flooding and protect water quality. The stormwater system, also known as a Municipal Separate Storm Sewer System (MS4), includes over 320 miles of underground pipes, 75 miles of open channels, and more than 18,000 structures (City of Santa Rosa 2025b). Stormwater is directed through street gutters, inlets, and pipes to local water bodies such as creeks and rivers. The system is designed to move water away from urban areas efficiently to prevent flooding during rain events (City of Santa Rosa 2025b).

Stormwater treatment in Santa Rosa focuses on reducing pollutants before the water reaches natural water bodies. The City employs Low-Impact Development (LID) techniques, such as specialized swales, planters, and rain gardens, which allow runoff to soak into the ground, mimicking natural processes (City of Santa Rosa 2020). These features help remove pollutants through biological and chemical processes, ensuring cleaner water enters the creeks and rivers. Additionally, the City monitors water quality by conducting chemical and biological sampling during storm events and the low flow season to assess the health of local creeks and identify pollutants of concern (City of Santa Rosa 2025b).

Discharge of stormwater is regulated under the National Pollutant Discharge Elimination System (NPDES) permit, issued by the North Coast Regional Water Quality Control Board (North Coast RWQCB) jointly to the City of Santa Rosa, County of Sonoma and the Sonoma County Water Agency (City of Santa Rosa 2025b). The City's discharge of stormwater is regulated under Order R1-2015-0030, issued by the North Coast RWQCB and described in Section 4.16.2, *Regulatory Setting*. This permit governs various activities, industrial and commercial businesses, new and redevelopment projects, construction sites, storm drain operation and maintenance, creek monitoring, pesticide

applications, and illegal dumping of water and other pollution in the city's storm drain. The City also enforces a stormwater ordinance to prevent illegal dumping and pollution. By integrating these measures, Santa Rosa aims to manage stormwater effectively, protect public health, and preserve the environment.

d. Electricity

Sonoma Clean Power (SCP) and Pacific Gas and Electric Company (PG&E) serve the County. PG&E is responsible for all electric delivery and maintaining the electric grid, and SCP provides an optional electric generation service (customers have the choice to opt out from SCP's service). SCP provides electricity through two clean energy services: CleanStart and EverGreen. The CleanStart service provides 88 percent carbon-free electricity and sources energy from renewable electricity (e.g., wind, solar, geothermal), carbon-free large hydroelectric power, and general system power. The EverGreen service provides 100 percent renewable electricity and sources energy from primarily geothermal sources and solar power (SCP 2025). PG&E has an energy mix of nuclear, renewable, large hydro, and natural gas (PG&E 2022). Existing power lines are available throughout the City of Santa Rosa, including on and around the project site.

As shown in Table 4.15-1, communitywide development in Sonoma County (the smallest scale at which electricity consumption data is readily available) consumed approximately 2,880 gigawatt-hours in 2022, which was approximately 1 percent of statewide electricity consumption (California Energy Commission [CEC] 2025a, 2025b). In comparison, the 2022 population of Sonoma County is approximately 1.2 percent of California's population (California Department of Finance [DOF] 2025). Therefore, per capita electricity consumption in Sonoma County is slightly lower than the statewide average.

Table 4.15-1 2022 Electricity Consumption

Energy Type	Sonoma County (GWh)	California (GWh)	Proportion of Statewide Consumption[1]
Electricity	2,880	287,826	1%

GWH = gigawatt-hours

[1] For reference, the population of Sonoma County (479,654 persons) is approximately 1.2 percent of the population of California (39,114,785 persons) (DOF 2025).

Source: CEC 2025a

e. Natural Gas

The City of Santa Rosa is in PG&E's natural gas service area, which spans central and northern California (PG&E 2014). In 2022, PG&E customers consumed 4.4 billion therms of natural gas. Residential users accounted for approximately 42 percent of PG&E's natural gas consumption (CEC 2024c). The remainder was used for industry (31 percent), commercial buildings (20 percent), mining and construction (5 percent), other commercial (1 percent), and agricultural and water pump accounts (1 percent) (CEC 2025c).

PG&E's service area is equipped with approximately 6,400 miles of gas transmission pipelines and 42,000 miles of gas distribution pipelines. As shown in Table 4.15-2, communitywide development in Sonoma County (the smallest scale at which natural gas consumption data is readily available) consumed approximately 107 million US therms in 2022, which was approximately 2.4 percent of natural gas consumption by PG&E customers and 0.9 percent of statewide natural gas consumption (CEC 20245b, 2025c). In comparison, the population of Sonoma County is approximately 1.2 percent

of California's population (DOF 2024). Therefore, per capita natural gas consumption in Sonoma is lower than the statewide average.

Table 4.15-2 2022 Natural Gas Consumption

Energy Type	Sonoma County (millions of US therms)	PGE (millions of US therms)	California (millions of US therms)	Proportion of PGE Consumption[1]	Proportion of Statewide Consumption[1]
Natural Gas	107	4422	11,710	2.4%	0.9%

[1] For reference, the population of Sonoma County (479,654 persons) is approximately 1.2 percent of the population of California (39,114,785 persons) (DOF 2025).

Source: CEC 2025b, 2025c

f. Telecommunications

In California, approximately 98 percent of households have access to telecommunication infrastructure, including telephone and cable access (California Broadband Map 2021). The City and Sonoma County, including the project site, are in the 707 area code and Local Access and Transport Area 1 (California Public Utilities Commission [CPUC] 2010). A Local Access and Transport Area is a geographical area within which a divested Regional Bell Operating Company is permitted to offer exchange telecommunications and exchange access services (CPUC 2020). Internet providers that service the City include AT&T Fiber, Xfinity, Hughesnet, Earthlink, T-Mobile, and Comcast (HighSpeedInternet.com 2025). Additionally, a number of wireless data and cellular phone companies provide service options to residents.

g. Solid Waste and Recycling

Recology, a private company, is responsible for the collection of municipal solid waste generated in in the City of Santa Rosa, including the project site. Recology provides weekly curbside collection of refuse, recycling, and yard debris and food scraps. Recology collection vehicles deliver the refuse material to Central Landfill outside of Petaluma, California. The city is within the jurisdiction of the Sonoma County Waste Management Agency (Zero Waste Sonoma), a Joint Powers Authority serving the nine cities and the unincorporated areas of Sonoma County. The landfill and facility site comprise 398 acres. Approximately 173 acres of the landfill and facility site are permitted for disposal. Central Landfill is anticipated to be operational through 2040 and can accept a maximum throughput of 2,500 tons per day. The remaining capacity of the landfill is 8,310,149 cubic yards (California Department of Resources Recycling and Recovery [CalRecycle] 2025a). Table 4.15-3 presents the amount of solid waste disposed of at the Central Landfill that originated from Sonoma County Waste Management Agency between the years of 2015 and 2019.

Table 4.15-3 Annual Solid Waste Disposal

Year	Solid Waste Disposed of at Central Landfill by Sonoma County Waste Management Agency (annual tons)	Solid Waste Disposed of at Central Landfill by other Jurisdictions (annual tons)*
2015	262,736	245
2016	303,976	111
2017	670,018	25
2018	908,918	26
2019	344,282	26

*Other jurisdictions include: Mendocino County (unincorporated), Point Arena, and Napa County

Source: CalRecycle 2025b

4.15.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The federal Clean Water Act (CWA), enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several State and local laws throughout the country. The CWA established the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA gave the United States Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the CWA is administered by the USEPA and United States Army Corps of Engineers. At the State and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine RWQCBs. The project site is located within the jurisdiction of the North Coast RWQCB and is subject to the management direction of the Water Quality Control Plan for the North Coast RWQCB ("Basin Plan"), discussed further under "Porter-Cologne Water Quality Control Act" in Section 4.15.2(b), *State Regulations*.

Section 402 of the CWA requires that all construction sites on an acre or greater of land, as well as municipal, industrial, and commercial facilities discharging wastewater or stormwater directly from a point source, such as a pipe, ditch, or channel, into a surface water of the United States must obtain permission under the National Pollutant Discharge Elimination System (NPDES) permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

Safe Drinking Water Act

The Safe Drinking Water Act (42 United States Code Section 300[f] et seq.; 40 Code of Federal Regulations [CFR] Section 141 et seq.) regulates public water systems that supply drinking water. The main components of the Safe Drinking Water Act are to:

1. Ensure that water from the tap is potable (safe for drinking, cooking, and hygiene)
2. Prevent contamination of groundwater aquifers that are the main source of drinking water for a community
3. Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 CFR Section 144)
4. Regulate distribution systems

Title 40 of the Code of Federal Regulations

Title 40 of the CFR, Part 258 (Resource Conservation and Recovery Act Subtitle D) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 set energy efficiency standards for lighting (specifically light bulbs) and appliances.

Energy Star Program

Energy Star is a voluntary labeling program introduced by the USEPA to identify and promote energy-efficient products to reduce greenhouse gas emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now also includes certifying commercial and industrial buildings as well as homes.

b. State Regulations

Water and Wastewater

Sustainable Groundwater Management Act

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the Department of Water Resources (DWR).

The Santa Rosa Plain Subbasin is a medium priority basin. As a result, in 2017, the City of Santa Rosa and other eligible water suppliers in groundwater basin joined together to form the Santa Rosa Plain GSA and develop a groundwater sustainability plan. The Santa Rosa Plain GSA is further described under the *Local Regulations* section below.

Urban Water Management Planning Act

In 1983 the California Legislature enacted the Urban Water Management Planning Act (Water Code Section 10610–10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt an UWMP at least once every five years and submit them to the DWR. Noncompliant urban water suppliers are ineligible to receive funding pursuant to Division 24, commencing with Section 78500, or Division 26, commencing with Section 79000, or receive drought assistance from the State until the UWMP is submitted and deemed complete pursuant to the Urban Water Management Planning Act.

Porter-Cologne Water Quality Control Act

The federal CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs. California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970

(Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and the nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the federal CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface water and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product. Each RWQCB must formulate and adopt a water quality control plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its state water policy. The Porter-Cologne Act also provides that a RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The project site is within the jurisdictional boundaries of the North Coast RWQCB.

Title 22 of California Code of Regulations

Among other things, Title 22 of the California Code of Regulations (Title 22) regulates public water systems and provides the authority for the SWRCB's Division of Drinking water to issue permits to public water systems. The City of Santa Rosa operates a public water system under permit number CA4910014. As required by its permit the city regularly monitors the quality of water it delivers and distributes annual consumer confidence reports to customers.

California Building Standards Code

Title 24 of the California Code of Regulations is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2022 Title 24 standards. The California Building Standards Code's standards related to utilities and service systems are outlined below.

PART 5 – CALIFORNIA PLUMBING CODE

The California Plumbing Code is codified in Title 24, California Code of Regulations, Part 5. The Plumbing Code contains regulations including, but not limited to, plumbing materials, fixtures, water heaters, water supply and distribution, ventilation, and drainage. More specifically, Part 5, Chapter 4, contains provisions requiring the installation of low flow fixtures and toilets. Existing development will also be required to reduce its wastewater generation by retrofitting existing structures with water efficient fixtures (Senate Bill [SB] 407 [2009] Civil Code Sections 1101.1 et seq.).

PART 11 – CALIFORNIA GREEN BUILDING STANDARDS

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The 2022 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers (Tiers I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

Regarding water conservation and stormwater drainage, the mandatory standards include requirements for a 20 percent reduction in indoor water use relative to specified baseline levels, the use of water-efficient irrigation systems for new development with an aggregate landscape area equal or greater than 500 square feet, and other indoor and outdoor water efficiency and conservation measures such as separate water submeters for subsystems and specific fixtures and fittings. The voluntary standards include stricter water conservation requirements for specific fixtures as well as 20 percent permeable paving for the Tier 1 standards and 30 percent permeable paving for the Tier II standards.

Electricity and Natural Gas

California Energy Commission

As the State's primary energy policy and planning agency, the CEC collaborates with State and federal agencies, utilities, and other stakeholders to develop and implement State energy policies. Since 1975, the CEC has been responsible for reducing the State's electricity and natural gas demand, primarily by adopting new Building and Appliance Energy Efficiency Standards that have contributed to keeping California's per capita electricity consumption relatively low. The CEC is also responsible for the certification and compliance of thermal power plants 50 megawatts and larger, including all project-related facilities in California (CEC 2025d).

California Public Utilities Commission

The CPUC regulates investor-owned electric and natural gas utilities operating in California. The energy work responsibilities of the CPUC are derived from the California State Constitution, specifically Article XII, Section 3 and other sections more generally, numerous State legislative enactments and various Federal statutory and administrative requirements. The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from PG&E and other natural gas utilities across California (CPUC 2025).

Senate Bill 350

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires a doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Solid Waste

California Department of Resources Recycling and Recovery

CalRecycle oversees, manages, and monitors waste generated in California. CalRecycle provides limited grants and loans to help California cities, counties, businesses, and organizations meet the State waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites, including facilities that accept hazardous waste substances and non-hazardous waste. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including Assembly Bill (AB) 939 and SB 1016, both of which are described below.

Assembly Bill 939

AB 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year

2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing and stimulate the purchase of recycled products.

Senate Bill 1016

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. The Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

Assembly Bill 341 – Mandatory Commercial Recycling

The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. AB 341 required all businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units to recycle by July 1, 2012. AB 341 also sets a statewide goal of 75 percent waste diversion.

Senate Bill 1383

SB 1383, which was passed in 2016, requires 75 percent organic waste diversion be achieved by 2025. The intent of SB 1383 is to reduce short-lived climate pollutants that are released by organic waste when such waste decomposes in landfills instead of being recycled into green products, such as compost.

c. Regional and Local Regulations

Sonoma Water Urban Water Management Plan

The Sonoma County Water Agency's Urban Water Management Plan (UWMP) is a comprehensive document updated every five years to ensure a reliable water supply for Sonoma and Marin Counties. The 2020 UWMP outlines existing water supplies, projected demands, and future water supply projects over the next 25 years (Sonoma Water 2021). It addresses climate change impacts, energy intensity, and water conservation activities, and includes an updated Water Shortage Contingency Plan. The plan aims to balance water supply and demand under various hydrological conditions, ensuring sustainable water management for the region. Sonoma Water is currently preparing its 2025 UWMP, which is expected to be finalized and submitted to DWR by July 1, 2026.

Sonoma Water Supply Strategies Action Plan

Sonoma Water's Water Supply Strategies Action Plan (WSSAP) is a key planning document aimed at enhancing water supply reliability, resiliency, and efficiency. Updated in 2018, the plan addresses challenges such as aging infrastructure, regulatory constraints, drought, and climate change (Sonoma Water 2018). It outlines specific strategies and projects to protect drinking water supplies, improve the water transmission system, and promote regional planning. The WSSAP emphasizes stakeholder involvement and community engagement to ensure sustainable water management.

Sonoma County Salt and Nutrient Management Plan

The Sonoma Water Salt and Nutrient Management Plan (SNMP) is part of California's Recycled Water Policy, designed to manage salts and nutrients in groundwater basins (Sonoma Water 2013). The SNMP evaluates the impact of recycled water use on groundwater quality and promotes basin-wide management strategies. It involves collaboration among wastewater entities and stakeholders to ensure compliance with water quality objectives and protect beneficial uses. The plan is periodically reviewed and updated to address emerging issues and maintain groundwater quality.

Sonoma County Stormwater Resource Plan

The Sonoma Water Stormwater Resource Plan (SWRP) is a non-regulatory, watershed-based plan developed to manage stormwater and dry weather runoff as valuable resources (Sonoma Water 2019). Mandated by Senate Bill 985, the SWRP identifies and prioritizes projects that capture, treat, or reuse stormwater runoff, providing multiple benefits such as environmental enhancement, flood protection, groundwater recharge, water quality improvement, and recreational opportunities. The plan promotes collaboration among local agencies and stakeholders to enhance community resilience and sustainability.

Countywide Integrated Waste Management Plan

The Countywide Integrated Waste Management Plan, dated October 15, 2003, provides a solid waste disposal strategy through the year 2050. The Sonoma County Waste Management Agency prepared this plan for the jurisdictions of Rohnert Park, Cloverdale, Cotati, Healdsburg, Petaluma, Santa Rosa, Sebastopol, Sonoma, Windsor, and the County of Sonoma. The plan includes the following goals, objectives, and policies to ensure adequate waste prevention, reuse, recycling, composting, and disposal services, intended to promote sustainability, conservation of natural resources, and achieve solid waste diversions.

Sonoma General Plan

The County General Plan was adopted by the Sonoma County Board of Supervisors Resolution 08-0808 on September 23, 2008. The County General Plan includes broad goals and policies applicable to utilities and service systems.

Goal PF-1: Assure that water and wastewater services are available where necessary to serve planned growth and development without promoting unplanned growth.

> **Policy PF-1a:** Plan, design, and construct sewer services in accordance with projected growth except as provided in Policy LU-4d.
>
> **Policy PF-1c:** Give the highest priority for water and sewer improvement planning to those service providers whose capacity for accommodating future growth is most limited. These include the Occidental County Sanitation District, the Geyserville Water Works and Geyserville Sanitation Zone, the Sweetwater Springs Water District, Monte Rio, the Town of Windsor (water supply to the Airport Industrial Area), the California American Water Company (Larkfield-Wikiup), the Airport-Larkfield-Wikiup County Sanitation Zone, the Valley of the Moon Water District, and the Sonoma Valley Sanitation District, or any entities which may succeed these service providers.

Policy PF-1d: Require as part of discretionary project applications within a water or sewer service area written certification that either existing services are available or needed improvements will be made prior to occupancy.

Policy PF-1e: Avoid General Plan amendments that would increase demand for water supplies or wastewater treatment services in those urban areas where existing services cannot accommodate projected growth as indicated in Table LU-1 or any adopted master plan.

Goal PF-2: Assure that park and recreation, public education, fire suppression and emergency medical, and solid waste services, and public utility sites are available to the meet future needs of Sonoma County residents.

Policy PF-2a: Plan, design, and construct park and recreation, fire and emergency medical, public education, and solid waste services and public utilities in accordance with projected growth, except as provided in Policy LU-4d.

Policy PF-2b: Work with the Cities to provide park and recreation, public education, fire and emergency medical, and solid waste services as well as public utilities. Use proposed annexations, redevelopment agreements, revenue sharing agreements, and the CEQA process as tools to ensure that incorporated development pay its fair share toward provision of these services.

Policy PF-2q: Review projects on or near designated solid waste facilities sites for compatibility with such facilities.

Goal WR-1: Protect, restore and enhance the quality of surface and groundwater resources to meet the needs of all reasonable beneficial uses.

Policy WR-1b: Design, construct, and maintain County buildings, roads, bridges, drainage and other facilities to minimize sediment and other pollutants in stormwater flows. Develop and implement “best management practices” for ongoing maintenance and operation.

Goal WR-4: Increase the role of conservation and safe, beneficial reuse in meeting water supply needs of both urban and rural users.

Policy WR-4e: Require water conserving plumbing and water conserving landscaping in all new development projects and require water conserving plumbing in all new dwellings. Promote programs to minimize water loss and waste by public water suppliers and their customers. Require County operated water systems to minimize water loss and waste.

Policy WR-4i: Assess water use by County buildings and facilities and reduce water consumption to the maximum extent practicable.

City of Santa Rosa Urban Water Management Plan

The City of Santa Rosa adopted its current 2020 UWMP in June 2021, in compliance with the Urban Water Management Planning Act, the Water Conservation Act of 2009, and Sections 10610 to 10656 of the California Water Code (City of Santa Rosa 2021). The UWMP describes water demands, water supply sources, and supply reliability for its service area in five-year increments for normal years, single dry years, and multiple dry years. The UWMP also provides water supply contingency planning in case of shortage emergencies, demand management measures to increase water use efficiency, and current and planned water conservation efforts. The 2020 UWMP describes water

demands, available water supply sources, and supply reliability for its service area in five-year increments for normal years, single-dry years, and multiple-dry years up to year 2045. The City is required to update its UWMP every five years and has initiated the process for its 2025 UWMP. The updated plan has not been published and is expected to be finalized and submitted to DWR by July 1, 2026.

City of Santa Rosa Sewer System Master Plan

The Santa Rosa Sewer System Master Plan (SSMP) was updated in August 2023 and serves to protect public health by ensuring the sustainability of water resources, infrastructure, and the environment (City of Santa Rosa 2023). The plan establishes regulatory requirements and strategic plans for local operations, detailing the organizational structure and communication chains for reporting sanitary sewer overflows. It provides an overview of regulatory requirements and legal authority discussions, and describes the operation and maintenance protocols for the sewer system. Additionally, the plan discusses design standards and performance criteria, outlines the emergency response plan for sewer overflows, and addresses control measures for fats, oil, and grease. It also evaluates the system's capacity to meet future demands and establishes procedures for monitoring and modifying the program as needed.

NPDES Permit for Regional Water Reuse System and Laguna Treatment Plant

The North Coast RWQCB reissued an NPDES permit in 2020 (Order No. R1-2020-0012) for the Santa Rosa Regional Water Reuse System and the Laguna Treatment Plant located at 4300 Llano Road in Santa Rosa. The City of Santa Rosa conveys wastewater from within the city to the WWTP and also accepts wastewater from the cities of Cotati, Rohnert Park, and Sebastopol as well as unincorporated areas of Sonoma County. The permit establishes an average dry weather flow of 21.34 million gallons per day (MGD). The facility is permitted to discharge tertiary treated wastewater to Santa Rosa Creek, an unnamed ditch tributary to Laguna de Santa Rosa, and Laguna de Santa Rosa from October 1 through May 14, but is limited to no more than 5 percent of the flow of the receiving water, as measured at the Hacienda Bridge (USGS Gauge). During the dry season, tertiary treated recycled water is distributed for irrigation on authorized use sites and for recharging the steam fields at the Geysers Recharge Project. The NPDES permit includes effluent limitations, water recycling specifications and requirements, and receiving water limitations. A monitoring and reporting program is also included as part of the NPDES permit. The permit was amended in 2021 (Order No. R1-2021-0041) to revise the Water Quality Training Framework for Laguna de Santa Rosa and clarify that the credits for long-term and multi-benefit projects do not expire.

Santa Rosa General Plan 2050

Though not applicable to the project, the following objectives and policies of the Santa Rosa General Plan are applicable to utilities and service systems in the city limits:

Goal 5-9: Provide adequate and high-quality city services for water, wastewater, recycled water, stormwater, and solid waste.

> **Policy 5-9.1:** Ensure water quality, water service delivery, and wastewater treatment are sufficient to meet the needs of current and future residents.
>
> **Policy 5-9.2:** Maintain water quality and encourage Santa Rosa Water customers to save water.

Policy 5-9.3: Ensure that water distribution lines are adequate for existing and future populations.

Policy 5-9.4: Ensure that adequate wastewater capacity is available to serve existing and future needs of the city.

Policy 5-9.5: Meet the city's solid waste disposal needs while maximizing opportunities for waste reduction and recycling.

Policy 5-9.6: Identify and work with partners to address impacts from groundwater threats and solid waste.

Policy 5-9.7: Facilitate residential, commercial, and industrial compliance with the Sonoma County Countywide Integrated Waste Management Plan.

4.15.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Impacts to utilities and service systems, including water, wastewater, stormwater, natural gas, electricity, and telecommunications are evaluated based on the project's adherence to local, state, and federal standards, and with consideration to the project's anticipated need for various utility services and facilities, in comparison to the capacity and condition of existing utilities and facilities. Development facilitated by the project would connect to existing facilities providing natural gas, electricity, and telecommunications services throughout the city and associated service areas; potential need for new or upgraded utility connections was considered based on existing site-specific conditions and regulatory requirements for reliable service connections. In addition, the project would utilize existing solid waste infrastructure in the region. Potential need for new or upgraded solid waste facilities was considered based on remaining capacity for existing facilities and regulatory requirements for solid waste disposal.

Significance Thresholds

In accordance with Appendix G of the *CEQA Guidelines*, a significant utilities impact would occur if new development facilitated by the proposed project would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
2. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
4. Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and/or
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project require or result in the relocation or construction of new or expanded 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?
Threshold 3:	Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact UTIL-1 THE PROPOSED PROJECT WOULD INCREASE DEMAND FOR WATER, WASTEWATER, STORMWATER, ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS. HOWEVER, THE PROPOSED PROJECT WOULD OCCUR IN DEVELOPED AREAS OF THE CITY WHERE THESE FACILITIES EXIST. COMPLIANCE WITH EXISTING, APPLICABLE LAWS AND REGULATIONS WOULD REDUCE POTENTIAL IMPACTS RELATED TO INCREASED DEMAND FOR WATER, WASTEWATER, STORMWATER, ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Office Site

Water

Existing large-scale water supply infrastructure, including Sonoma Water's facilities, the city's wellfield, and the recycled water treatment and distribution systems, exists and would be available for the proposed project. The County buildings that would be demolished are currently connected to City of Santa Rosa water infrastructure, and the new office building and Emergency Coordination Center (ECC) would be connected to this infrastructure, consistent with existing conditions.

The proposed project may require some upgraded local pipeline infrastructure, the installation of which would result in ground disturbance. Generally, such ground disturbance would occur within the project site and in previously disturbed or developed rights-of-way, reducing the potential for environmental impacts. Additionally, this EIR assumes the entire project site would be disturbed by construction. Therefore, the office site would not result in construction or relocation of water facilities such that significant environmental impacts would occur.

Wastewater

The office site would generate a minimal increase in wastewater flows with approximately 18 additional employees. This incremental increase would be negligible relative to existing wastewater generation at the site and would not be expected to measurably affect flows within the City of Santa Rosa sewer system or treatment at the Laguna Treatment Plant (LTP). The project site is currently served by existing City of Santa Rosa wastewater infrastructure, and this infrastructure would serve the proposed office development.

Wastewater generation for each site of the proposed project is based on estimated water demand described under Impact UTIL-2. Using the total water demand estimate of the office site of 100 AFY, wastewater generation is approximately 78 AFY (0.07 MGD). The LTP has capacity to treat 21.3 MGD of average dry weather flow and currently treats approximately 13.6 MGD, leaving 7.7 MGD of remaining capacity. The office site would account for approximately 0.9 percent of the LTP's remaining capacity. The project site is currently served by existing City of Santa Rosa wastewater infrastructure, which would continue to adequately accommodate the proposed office site and the

anticipated additional 18 employees. No expansion of the LTP or construction of new or relocated wastewater treatment facilities would be required. Therefore, the office site would not require expansion of the LTP or the construction or relocation of wastewater facilities that could cause significant environmental impacts.

Stormwater

As discussed in Section 4.9, *Hydrology and Water Quality*, the office site would comply with the NPDES MS4 General Permit and the City of Santa Rosa Low Impact Development Manual, which require BMPs for stormwater retention and runoff. The office site would also be required to pay a stormwater assessment pursuant to Santa Rosa Municipal Code Title 16, and comply with Sonoma County Code Section 11.04.010, which requires drainage permits to ensure improvements do not adversely affect structures or adjacent properties.

Detailed stormwater design has not yet been completed; however, stormwater features would be anticipated to include, but would not be limited to, surface-based treatment measures such as bioretention areas. Underground detention facilities are not anticipated as part of the proposed project design. Compliance with low impact development (LID) and engineering standards (e.g., impermeable liners, watertight joints) would ensure no adverse impacts.

Therefore, stormwater improvements at the office site would not require the construction or expansion of storm drain facilities that would cause significant environmental impacts.

Electric Power

The office site would create additional electricity demand. As described in Section 4.5, *Energy*, development would not result in inefficient or wasteful energy use. The site is located within an already developed and urbanized area where PG&E and SCP electric infrastructure is present. The project would be subject to applicable local, regional, State, and federal policies—including Title 24 and CALGreen, which require efficient appliances, building materials, and on-site solar for new residential development. Therefore, the office site would not require expansion or relocation of electric power facilities. Impacts would be less than significant.

Natural Gas

The office site would be 100 percent electric and not require natural gas utility service.

Telecommunications

The office site would require connections to existing telecommunications infrastructure. Based on available services, construction of new telephone or cable lines would not be required, and the project would connect to existing infrastructure on and surrounding the project site. Therefore, impacts would be less than significant.

Residential Site

Water

The residential site would include up to approximately 1,500 residential units and approximately 20,000 square feet of retail/commercial space, and accommodate approximately 32 additional employees. These uses would be supplied by the existing City of Santa Rosa water system, which is

supported by Sonoma Water's regional facilities, the City's wellfield, and the City's recycled water treatment and distribution system.

Development of this magnitude would increase overall water demand compared to existing conditions. As discussed within the Water Supply Assessment (WSA) prepared by Rincon Consultants in December 2025 (Appendix M), the project is located within an already urbanized area currently served by City water infrastructure, and water demand from the proposed residential and retail/commercial uses is consistent with the level of growth anticipated under the City's General Plan and evaluated in the City's UWMP. The UWMP demonstrates that existing and planned water supplies and treatment capacity are sufficient to meet long-term demand, including growth in areas such as the project site. Because the project's demand falls within the City's planned service population and does not exceed the systemwide capacity evaluated in the UWMP, no expansion of off-site water supply, treatment, or regional conveyance facilities would be required.

The existing County facilities on the site are already connected to the City's system. Any additional on-site or local pipeline upgrades needed to serve the increased residential and retail/commercial demand would be limited to short extensions or replacements of distribution-level pipelines. Installation of these improvements would occur within the project site or within previously disturbed or developed rights-of-way, which would minimize the potential for environmental impacts.

As described in this EIR, the analysis conservatively assumes the entire project site would be disturbed as part of construction activities. Therefore, the installation of any local distribution upgrades to support the residential site (which includes the retail/commercial space) would not result in construction or relocation of major water infrastructure that could cause significant environmental effects.

Because the project would connect to an existing municipal water supply system, would not require the expansion or relocation of off-site water supply facilities, and any necessary on-site improvements would occur in already disturbed areas, the residential site (including retail/commercial uses) would not result in the construction or relocation of water facilities that could cause significant environmental impacts. Impacts would be less than significant.

Wastewater

The residential site would generate new sources of wastewater from both residential uses and the retail/commercial component, including wastewater associated with residents, visitors, employees and customers. Wastewater flows would connect to the existing City of Santa Rosa sewer system, which directs flows to LTP. The project site is currently served by existing wastewater infrastructure, and this infrastructure would continue to serve the proposed development.

Increased residential density could require local pipeline upgrades, the installation of which would occur in previously disturbed or developed rights-of-way. The wastewater generation calculations for the development facilitated by the proposed project are based on the estimated water demand described under Impact UTIL-2. Wastewater generation for the residential site (which includes the retail/commercial space) of the proposed project is estimated at approximately 240 AFY, or 0.18 MGD, based on total water demand. The LTP has a treatment capacity of 21.3 MGD and currently treats approximately 13.6 MGD, leaving 7.7 MGD of remaining capacity. Therefore, the residential site of the proposed project would account for approximately 2.3 percent of remaining capacity. Accordingly, the residential site would not require expansion of the LTP or the

construction/relocation of wastewater facilities that could cause significant environmental impacts. Impacts would be less than significant.

Stormwater

As discussed in Section 4.9, *Hydrology and Water Quality*, the residential site (including retail/commercial space) would be required to comply with the NPDES MS4 General Permit and the City of Santa Rosa Low Impact Development Manual, which requires BMPs for stormwater retention and runoff. The project would also be required to pay storm water assessments under Santa Rosa Municipal Code Title 16 and comply with Sonoma County Code Section 11.04.010, which requires drainage permits for any drainage improvements.

As discussed above, detailed stormwater design has not yet been completed; however, stormwater features would be anticipated to include, but would not be limited to, surface-based treatment measures such as bioretention areas. Underground detention facilities are not anticipated as part of the proposed project design. Compliance with LID requirements and applicable engineering standards, including impermeable liners, watertight joints, and siting considerations—would prevent intrusion and maintain structural integrity.

Compliance with the MS4 permit and applicable City and County stormwater standards ensures that the residential site would not require the construction or expansion of storm drain facilities that would cause significant environmental impacts. Impacts would be less than significant.

Electric Power

The residential site would increase demand for electricity from approximately 1,500 units and the retail/commercial uses (including on-site employees and customer-serving operations). The project site is located in an already developed area where electric infrastructure for PG&E and SCP is present and would support the proposed development. The project would also be subject to applicable local, regional, State, and federal energy efficiency requirements, including Title 24 and CALGreen, which require efficient building systems and on-site solar for new residential development. Therefore, the residential site would not require expansion or relocation of electric power facilities and impacts would be less than significant.

Natural Gas

The residential site would be 100 percent electric and would not require natural gas utility service.

Telecommunications

The residential site would require telecommunications connections for future residents and retail/commercial operations, including voice, data, and internet services. Existing telecommunications infrastructure is available adjacent to the project site. Construction of new off-site telephone or cable lines would not be required, and the project would connect to existing infrastructure on and surrounding the project site. Therefore, the residential site would be adequately served by existing telecommunications facilities, and impacts would be less than significant.

Mitigation Measure

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 THE PROPOSED PROJECT WOULD INCREASE DEMAND FOR WATER SUPPLY. HOWEVER, THERE IS ADEQUATE WATER SUPPLY TO SERVE THE PROJECT DURING NORMAL, DRY, AND MULTIPLE DRY YEARS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Office Site

Development facilitated by the proposed project would increase employment by 18 employees in Santa Rosa, resulting in an incremental increase in overall citywide water demand and demand within Sonoma Water's service area. As discussed in Chapter 2, *Project Description,* the proposed project would result in a net increase in non-residential building square footage of up to 65,000 square feet for the main office building and 7,000 to 13,000 square feet for the ECC. The 65,000-square-foot increase reflects the difference between the proposed 250,000-square-foot office building and the approximately 185,000 square feet of existing buildings to be demolished. Utilizing water demand factors provided in the WSA, the projected water demand is estimated below in Table 4.15-4 (Appendix M). As shown therein, development of the office site would result in approximately 105 AFY of water demand based on the City's REF methodology.

Table 4.15-4 Proposed Office Site Estimated Water Demand

Land Use	Quantity	Unit	Demand Factor	Projected Demand (REFs)[1]	Total Projected Water Demand (AFY)
Office (Administrative Building)	250,000	square feet (sf)	1 REF/500 sf	500	100
Office (ECC)	7,000-13,000	square feet (sf)	1 REF/500 sf	26	5
Total				**526 REFs**	**105 AFY**

AFY = acre-feet per year; REF = Residential Equivalency Factor; sf = square feet

[1] For consistency with the City of Santa Rosa's 2020 UWMP and General Plan 2050, a REF was applied to each land use under the proposed project, where one REF is equivalent to the average water use of one detached residential unit per year, which is estimated to be approximately 65,345 gallons per year, or 0.20 AFY.

Source: Appendix M

The ECC is conservatively categorized as an office use for purposes of applying water demand factors consistent with the City's Residential Equivalency Factor (REF) methodology. While the ECC would operate at full capacity only during emergency events and would otherwise function as intermittently used conference space, its inclusion ensures a conservative estimate of water demand. Actual water demand associated with the ECC is expected to be substantially lower than shown in Table 4.15-4.

However, it should be noted that while the project includes a County office site, it would accommodate only 18 additional employees compared to existing conditions, representing a relatively incremental increase in water demand. The estimate in Table 4.15-4 is conservative, as it

assumes full utilization of new office space rather than the staffing increase. For a more realistic estimate based on staffing, typical office water use is approximately 50 gallons per employee, per day, resulting in 900 gallons per day, or 328,500 gallons per year. The office site would then require 1 AFY which is significantly less than the REF-based estimate.

Residential Site

In addition to the development of office space, the proposed project would involve the development of 1,500 residential units, 20,000 square feet of retail/commercial space, and approximately 32 additional employees. The operation of which would result in an increase in overall citywide water demand and demand within Sonoma Water's service area. Utilizing water demand factors provided in the WSA, the projected water demand is estimated below in Table 4.15-5 (Appendix M). As shown therein, development of the residential site would result in approximately 308 AFY

Table 4.15-5 Proposed Residential and Retail/Commercial Site Estimated Water Demand

Land Use	Quantity	Unit	Demand Factor	Projected Demand (REFs)[1]	Total Projected Water Demand (AFY)
Residential	1,500	units	1 REF/unit	1,500	300
Commercial/Retail	20,000	sf	1 REF/500 sf	40	8
Total				**1,540 REFs**	**308 AFY**

AFY = acre-feet per year; REF = Residential Equivalency Factor; sf = square feet

[1] For consistency with the City of Santa Rosa's 2020 UWMP and General Plan 2050, a REF was applied to each land use under the proposed project, where one REF is equivalent to the average water use of one detached residential unit per year, which is estimated to be approximately 65,345 gallons per year, or 0.20 AFY.

Source: Appendix M

Overall Project Water Demand

As shown in Table 4.15-4 and Table 4.15-5, above, the proposed project would have a combined total water demand of 413 AFY. This demand reflects a conservative estimate of the total projected water demand associated with buildout of the proposed project. Water for the project would be provided by the City of Santa Rosa, which purchases approximately 95 percent of its potable supply from Sonoma Water and produces the remainder from local groundwater and recycled water. These water supply sources are detailed in the WSA (Appendix M).

The supply availability projections presented in Table 4.15-6 and Table 4.15-7 below account for anticipated water demands within the City of Santa Rosa. As shown therein, the proposed growth under the project would account for between 1.6 percent and 1.9 percent of the total projected demand in normal and single-dry years through 2045.

Table 4.15-6 City of Santa Rosa – Normal Year Supply and Demand

	2025	2030	2035	2040	
Supply totals[1]	31,540	31,540	31,540	31,540	31,540
Demand totals	21,660	23,083	23,652	24,329	25,097
Difference	9,880	8,457	7,888	7,211	6,443
Shortage	0%	0%	0%	0%	0%

Note: Supply and demand totals are shown in AFY
[1] When excess supply is available, the projected supply is shown as equal to demand.
Source: Appendix M

Table 4.15-6 shows that the City of Santa Rosa would have adequate water supply available in normal years to meet all projected demands through 2045.

Table 4.15-7 City of Santa Rosa – Single Dry Year Supply and Demand

	2025	2030	2035	2040	2045
Supply totals[1]	22,660	20,639	20,937	20,978	21,689
Demand totals	21,660	20,629	20,937	20,978	21,689
Difference	1,000	0	0	0	0
Shortage	0%	0%	0%	0%	0%

Note: Supply and demand totals are shown in AFY
[1] When excess supply is available, the projected supply is shown as equal to demand.
Source: Appendix M

Table 4.15-7 shows that under single dry year conditions, the City of Santa Rosa anticipates having sufficient water supply available to meet demands, with a slight surplus of 1,000 AF in 2025. Following 2025, the City forecasts that there would be a shortfall of imported surface water supply available from Sonoma Water, for the single-dry year that is hydrologically equivalent to the driest water year on record (1977) (Appendix M). Beginning in 2030, Sonoma Water's demands are anticipated to exceed available supplies due to Lake Sonoma declining below 100,000 AF before July 15th and the subsequent requirement by Sonoma Water's water rights to decrease diversions by 30 percent (Appendix M). During these single dry years, Sonoma Water works with its customers, including the City of Santa Rosa, to reduce water demands and utilize local supplies. As described in Section 4.15.1, *Setting*, the City of Santa Rosa has local water supply sources through groundwater resources and recycled water, neither of which would be reduced in availability during the single dry year condition. To mitigate the shortfall in contract water supply, the city would implement its Shortage Plan to ensure demand does not exceed supply should such a shortage occur during a single-dry year (Appendix M).

Table 4.15-8 shows that Sonoma Water projects no water supply deficiencies during multiple consecutive dry-year conditions, with adequate water supply available to meet demands through the 2045 planning horizon. The water demands presented do not reflect local water supply developed by Sonoma Water's individual contractors, rather, these demands reflect the amount of water anticipated to be needed by Sonoma Water contractors to meet their local needs, in addition to their respective local supplies.

Table 4.15-8 City of Santa Rosa – Multiple Dry Years Supply and Demand

		2025	2030	2035	2040	2045
First Year	Supply totals[1]	22,660	24,083	24,652	25,329	26,097
	Demand totals	21,660	23,083	23,652	24,329	25,097
	Difference	1,000	1,000	1,000	1,000	1,000
Second Year	Supply totals	22,660	24,083	24,652	25,329	26,097
	Demand totals	21,660	23,083	23,652	24,329	25,097
	Difference	1,000	1,000	1,000	1,000	1,000
Third Year	Supply totals	22,661,000	24,083	24,652	25,329	26,097
	Demand totals	21,660	23,083	23,652	24,329	25,097
	Difference	1,000	1,000	1,000	1,000	1,000
Fourth Year	Supply totals	22,660	24,083	24,652	25,329	26,097
	Demand totals	21,660	23,083	23,652	24,329	25,097
	Difference	1,000	1,000	1,000	1,000	1,000
Fifth Year	Supply totals	22,660	24,083	24,652	25,329	26,097
	Demand totals	21,660	23,083	23,652	24,329	25,097
	Difference	1,000	1,000	1,000	1,000	1,000

[1] When excess supply is available, the projected supply is shown as equal to demand.

Source: Appendix M

As shown above, the City of Santa Rosa is projected to have a water demand of between 21,660 and 25,097 AFY, with a small surplus through 2045 under multiple dry year conditions. Of this, the proposed project would account for between 1.6 to 1.9 percent of the annual projected demand within the City of Santa Rosa. Under multiple dry year conditions for five-year periods that are hydrologically equivalent to the five driest consecutive years on record (1987-1991), the City would have adequate water supplies to meet demands through 2045 (Appendix M). Accordingly, the City of Santa Rosa and its primary water supplier, Sonoma Water, anticipate having sufficient supply available to meet all demands within its service area, including for the proposed project. Overall, sufficient water supply would be available for the proposed project under normal-year, single dry-year, and multiple dry-year conditions.

Mitigation Measure

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4:	Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
Threshold 5:	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-3 THE PROPOSED PROJECT WOULD INCREASE THE VOLUME OF SOLID WASTE GENERATED IN THE COUNTY. HOWEVER, DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT GENERATE SOLID WASTE IN EXCESS OF STATE OR LOCAL STANDARDS OR IN EXCESS OF THE CAPACITY OF LOCAL INFRASTRUCTURE. THE PROJECT WOULD BE DEVELOPED IN ACCORDANCE WITH SOLID WASTE REDUCTION STATUTES AND REGULATIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Office Site

The office site would result in the construction of up to 250,000 square feet of office space, an approximately 65,000 square foot increase compared to existing conditions, as well as a 7,000- to 13,000-square-foot ECC, and an addition of 18 net new employees. The ECC is not quantified separately in Table 4.15-9 because it would operate at full capacity only during emergency events and would otherwise function as intermittently used conference space. Therefore, its contribution to daily solid waste generation is expected to be minimal and is not anticipated to measurably affect overall solid waste generation rates.

Based on CalRecycle's solid waste generation rates as shown in Table 4.15-9, the proposed project would generate an additional estimated 0.15 tons, or 0.3 cubic yards, of solid waste per day associated with these land uses compared to existing conditions. However, it should be noted that while the project includes a County office site, it would accommodate only 18 additional employees compared to existing conditions, representing a relatively incremental increase in solid waste generation and infrastructure demand. The estimate in Table 4.15-9 is conservative, as it assumes full utilization of new office space rather than the staffing increase.

Table 4.15-9 Proposed Office Site Projected Solid Waste Generation

	Proposed Project			Projected Solid Waste Generation		
Land Use	Quantity (Net Increase)	Unit	Generation Rate[1]	Solid Waste (pounds per day)	Solid Waste (tons per day)	Solid Waste (cubic yards per day)[2]
Office	65,000	Square feet	6 pounds/ 1,000 square feet/day	390	0.195	0.39
Total				**390**	**0.195**	**0.39**

[1] Source: CalRecycle 2019

[2] Conversion factor assumed to be 1,000 pounds per cubic yard.

According to CalRecycle, the remaining capacity of the Central Landfill is 8,310,149 cubic yards, with a maximum daily permitted throughput of 2,500 tons per day (CalRecycle 2025a). The office site would yield a daily solid waste generation rate of approximately 0.195 tons per day. This would account for approximately 0.008 percent of the maximum daily throughput and less than 0.01 percent annually of the remaining capacity of the Central Landfill.

Development facilitated by the project would be required to comply with existing solid waste statues and regulations. The County of Sonoma is required by AB 939 to divert 50 percent of solid

waste from landfills, by SB 1383 to divert 75 percent of organic waste by 2025, and by AB 341 with a solid waste diversion rate of 75 percent. Consistent with the Sonoma County Waste Management Agency's Countywide Integrated Waste Management Plan, the project would comply with the requirements of AB 939. Local infrastructure would have the capacity to accommodate solid waste generated by the proposed project. Further, the project would be required to provide on-site trash, recycling, and compost receptacles for collection and disposal in an effort to increase diversion of solid waste from new non-residential uses. With adherence to the required solid waste diversion rates, impacts related to solid waste would be less than significant.

Residential Site

The residential site would result in the addition of up to 1,500 residential units and 20,000 square feet of retail/commercial space. Based on CalRecycle's solid waste generation rates as shown in Table 4.15-9, the proposed residential site would generate an estimated 9.23 tons, or 18.3 cubic yards, of solid waste per day associated with these land uses.

Table 4.15-10 Proposed Residential Site Projected Solid Waste Generation

	Proposed Project			Projected Solid Waste Generation		
Land Use	Quantity	Unit	Generation Rate[1]	Solid Waste (pounds per day)	Solid Waste (tons per day)	Solid Waste (cubic yards per day)[2]
Residential Units	1,500	Dwelling units	12.23 pounds/ dwelling unit/day	18,345	9.1	18.3
Commercial	20,000	Square feet	13 pounds/ 1,000 square feet/day	260	0.13	0.26
Total				**18,605**	**9.23**	**18.3**

[1] Source: CalRecycle 2019

[2] Conversion factor assumed to be 1,000 pounds per cubic yard.

As stated above, the remaining capacity of the Central Landfill is 8,310,149 cubic yards, with a maximum daily permitted throughput of 2,500 tons per day (CalRecycle 2025a). The project would yield a daily solid waste generation rate of approximately 9.23 tons per day. This would account for approximately 0.4 percent of the maximum daily throughput and approximately 0.08 percent annually of the remaining capacity of the Central Landfill.

Similar to the office site, the development of the residential site would be required to comply with existing solid waste statues and regulations. Local infrastructure would have the capacity to accommodate solid waste generated by the residential site of the project. Further, the County would require residences and retail/commercial spaces to provide on-site trash, recycling, and organics receptacles for collection and disposal in an effort to increase diversion of solid waste from new residential and retail/commercial uses. With adherence to the required solid waste diversion rates, impacts related to solid waste would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

This impact would be less than significant without mitigation.

4.15.4 Cumulative Impacts

The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Santa Rosa, in addition to the proposed project.

Water

The geographic scope for cumulative water supply impacts is the Santa Rosa Plain Groundwater Basin, Sonoma Water's service area, and the Subregional Recycled water service. This geographic scope is appropriate because these are the sources of groundwater, water supply, and recycled water that would supply water to the proposed project and cumulative projects relying on the same water supply sources.

Cumulative development in the water service area would continue to increase demand on water supplies. The Sonoma Water 2020 UWMP considered population growth projections from ABAG/MTC in its analysis of projected water supply and demand data. The Sonoma Water 2020 UWMP shows that Sonoma Water has adequate water supply to meet demands through 2045 under most conditions, including under the five-year drought risk assessment (Sonoma Water 2021). Therefore, cumulative impacts to water supplied by Sonoma Water would be less than significant. As discussed under Impacts UTIL-1 and UTIL-2, the project would not result in demands on Sonoma Water resources that could not be met; therefore, the project would not have a considerable contribution to this cumulative impact.

Similarly, cumulative development would result in increased demand for groundwater and recycled water. As noted in the Santa Rosa Plan GSP and Santa Rosa's Master Plan for the Laguna Treatment Plant, the basin is generally in balance and the GSP establishes management criteria for long-term sustainable performance through 2042, and additional capacity is available at the Laguna Treatment Plant. Therefore, cumulative impacts to recycled water and groundwater would be less than significant. As discussed under Impacts UTIL-1 and UTIL-2, the project would not result in demands on recycled water and groundwater resources that could not be met; therefore, the project would not have a considerable contribution to this cumulative impact.

Wastewater

The geographic scope for cumulative wastewater facilities impacts encompasses all areas within the Santa Rosa Subregional System. This geographic scope is appropriate because the local wastewater operator is responsible for treating and discharging wastewater to all land uses within its service area.

Cumulative development in the wastewater service area would continue to increase wastewater generation. As described under Impact UTIL-3, there is sufficient existing wastewater capacity to accommodate anticipated cumulative development. Therefore, cumulative impacts related to wastewater facility capacity would be less than significant.

Stormwater

The geographic scope for cumulative stormwater impacts is the City's stormwater collection area. This geographic scope is appropriate because the City of Santa Rosa is responsible for providing stormwater collection services to all residential, commercial, industrial, and fire protection uses within its service area.

Cumulative projects predominantly consist of residential and commercial uses. The cumulative plans and projects would be located in urban areas that would be served by existing municipal storm drainage systems. Although the Sonoma County Zoning Code and the Santa Rosa Municipal Code do not apply to development on County-owned property, other applicable provisions of the Sonoma County Code may apply, and the County would implement the project consistent with applicable standards, including an MS4 permit which establishes performance standards for stormwater management, low-impact development (LID), and post-construction stormwater controls. In addition, the County has incorporated stormwater control features into the project design that are consistent with requirements of County Code and the MS4 permit and LID development standards. These features include treatment and retention measures that would reduce stormwater runoff volume and velocity compared to existing conditions.

Because the proposed project would comply with the MS4 permit and would incorporate stormwater management and LID measures that are consistent with local code requirements, the project would not result in stormwater impacts that, when combined with cumulative development, would be cumulatively considerable. As such, cumulative impacts would be less than significant.

Electric Power and Natural Gas Transmission Facilities

The geographic scope for cumulative electricity and natural gas impacts is the PG&E and SCP service area. This geographic scope is appropriate because, as the local providers, PG&E and SCP are responsible for transmitting electricity (both companies) and natural gas (PG&E only) to all land uses within its service area. SCP relies on PG&E infrastructure to supply electricity.

PG&E is subject to the requirements set forth and/or enforced by the CPUC which is responsible for conducting and managing environmental review of infrastructure projects. The need for electric and natural gas infrastructure would be addressed on a case-by-case basis for each cumulative project, and would be subject to CPUC requirements, similar to those applicable to the project. Cumulative development projects would be subject to applicable local, regional, State, and federal policies regarding energy efficiency including new iterations of the California Building Energy Efficiency Standards and CALGreen which require increasingly more efficient appliances and building materials that reduce energy consumption in new development. Therefore, cumulative impacts related to electric power and natural gas transmission facilities would be less than significant.

Telecommunication

The geographic scope for cumulative telecommunications impacts is Sonoma County. This geographic scope is appropriate because local providers are responsible for providing adequate telecommunication infrastructure to all land uses within the county.

Cumulative development would increase demand for telecommunications infrastructure in the county. However, cumulative projects would each be required to provide adequate telecommunications infrastructure on a project-by-project basis and would be subject to the same requirements as the project. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

Solid Waste Facilities

The geographic scope for cumulative solid waste impacts encompasses all areas in the county that contribute solid waste to the County's Central Landfill. This geographic scope is appropriate

because, as the local provider, the County's Central Landfill is responsible for accepting solid waste from all land uses within its service area.

As discussed in Section 4.16.1(g), the Central Landfill is projected to reach its maximum capacity in 2040 (CalRecycle 2025a). Compliance with applicable solid waste regulations would maintain or improve upon diversion rates. Cities in the region have implemented waste diversion programs and policies to meet state-mandated solid waste diversion rates. For example, AB 341 requires a solid waste diversion rate of 75 percent. Thus, cumulative impacts to solid waste facilities would be less than significant.

4.16 Wildfire

This section addresses project impacts associated with wildfire. Specifically, this analysis addresses impacts related to potential interference with adopted emergency response and evacuation plans, wildfire risks due to site-specific conditions, and the exposure of people and structures to hazards such as post-fire flooding, landslides, or slope instability. This section is based, in part, on applicable wildfire hazard mapping, local and regional fire management plans, and the Evacuation Travel Time Assessment prepared by Fehr & Peers for the project in June 2026 (Appendix N).

4.16.1 Setting

a. Wildfire Fundamentals

A wildfire is an uncontrolled fire in an area of extensive combustible fuel, including vegetation and structures. Wildfires differ from other fires in that they take place outdoors in areas of grassland, woodlands, forests, brushland, scrubland, peatland, and other wooded areas that act as a source of fuel, or combustible material. Buildings may become involved if a wildfire spreads to adjacent communities. The primary environmental factors that increase an area's susceptibility to wildfire include slope and topography, vegetation type and condition, and weather and atmospheric conditions. Additional factors that increase an urban area's susceptibility to wildfire are development patterns and density, building types, and building materials.

The effects of wildfires can be catastrophic. In addition to stripping the land of vegetation and destroying natural resources, post-fire conditions leave exposed slopes and hillsides vulnerable to surface erosion and runoff. Soil exposed to intense heat may lose its capacity to absorb moisture and support life. Debris flows during post-fire rainy seasons can pose a risk to life and property and occur with little warning. Any storm that has rainfall intensities greater than approximately 10 millimeters/hour (0.4 inches/hour) poses the risk of producing debris flows (United States Geological Survey 2018). Wildfires also have negative impacts on air quality. Exposure to smoke and particulate matter has immediate and long-term public health impacts; populations may suffer from eye irritations, respiratory problems, and complications to existing lung and heart conditions.

Wildfire has three basic elements: how and where its ignition occurred; how and why it moves across a landscape from its point of origin; and what the fire's nature is upon arrival at a location. In general, a fire's nature is defined by eight characteristics:

1. **Direction of the advance of the fire front.** A fire front's direction of travel is primarily determined by direction of prevailing winds, geographic aspect, and condition of the fuels in the advance direction of the fire.
2. **Speed of the advance of the fire front (rate of spread).** The speed of a fire front's advance is a result of conditions at the site of the currently burning material and of lands in the advance direction of the fire. As a fire advances, the overriding influences determining its speed are prevailing wind speed, terrain slope gradient, dominant fuel size classes, and fuel continuity.
3. **Mechanism causing the advance.** Wildfires advance by two principal mechanisms - combustion resulting from radiant heating and remote ignition resulting from ember production.
4. **Duration at any one location.** Fire stays at one location primarily due to the size class of the material being consumed. Grass formations are dominated by low volumes of very "fine" fuels and, depending on the level of dryness, can be consumed, with the fire advancing, in a matter of

minutes. On the other hand, tree-dominated vegetation has significantly greater volumes of available fuel and a far greater amount of larger-sized fuel components. Fires can remain at these locations for days, often weeks, and sometimes months (on heavily-wooded conifer forest sites).

5. **Structure-related consumption of fuels.** Fires burn where fuels are available. Fires in grasslands burn at a level set by the height of the grass, while fires in brushlands can burn surface fuels and typically consume the stems and leafy crowns to the full height of the plants. Fires in tree-dominated vegetation have a much more complex pattern of movement based primarily on the continuity (or "connectedness") of the fuels. In these stands, there are typically three distinct layers of fuels, arranged vertically - surface, stems and trunks, and the crown, which is composed of branches, twigs, and leaves. The continuity of fuels is important to consider in both horizontal and vertical directions. If a fire enters a stand and is advancing only as a surface fire, it will continue this manner of advance if there is high horizontal fuel connectivity. However, if there is also a high degree of vertical continuity (provided by fuels referred to as "ladder fuels"), then a fire can move up into the crown as well as forward across the surface, involving fuels in the entire stand structure.
6. **Flame length.** Flame lengths are generally determined by the volume of fuels burning, the amount of time to total consumption, and the height of the species in the composition. Grassland produces flame lengths typically ranging from one to three feet as they are composed of low volumes of fine materials that are consumed quickly. Flame lengths are at their maximum when the material is dry. Stands of brush can produce flame lengths from 4 to 10 feet. Native oak-dominated hardwood stands can generate 20- to 40-foot flame lengths, and stands of exotics, such as *Eucalyptus globulus* or *E. cinerea,* or dense conifer stands can generate flame lengths over 100 feet. Flame length is important because it sets the distance over which radiant heating-related combustion can occur.
7. **Intensity.** The temperature achieved in a wildfire is directly related to the amount of cellulosic material available for consumption. Grasslands have very low amounts and attain lower temperatures but woodlands, characterized by large amounts of highly-concentrated cellulosic material, can attain temperatures on the order of 1,800 degrees Fahrenheit.
8. **Gaining control.** Gaining control over a wildfire's behavioral character is the objective of response efforts. Grassland fires, burning in low fuel volume, rapid consumption, and at a single level, are the easiest to bring under control. On the other end, fires that are burning in high fuel volumes, full spectrum size classes, and entire stand structure involvement can require days, weeks, or even months to bring under complete control.

b. Wildfire-Conducive Conditions

Vegetation

Vegetation is fuel to a wildfire, and it changes over time with seasonal growth and die-back. The relationship between vegetation and wildfire is complex, but generally some vegetation is naturally fire-resistant, while some vegetation is extremely flammable. For example, cured or dry grass, is much more flammable than standing trees. Grass is considered an open fuel, in which oxygen has free access to promote the spread of fire. Additionally, weather and climate conditions, such as drought, can lead to increasingly dry vegetation with low moisture content and, thus, higher flammability.

The project site is located within a fully urbanized area of the City of Santa Rosa and is currently developed with County office buildings, surface parking, and associated infrastructure. Vegetation within the project site is limited to ornamental landscaping, including turf, shrubs, and scattered trees associated with existing development. The urban surrounding area includes existing government facilities, commercial uses, and residential development. As such, the project site does not contain extensive natural vegetation communities that would typically contribute to wildfire spread. Vegetation present on the project site is described in Section 4.4, *Biological Resources*.

Slope, Elevation, and Aspect

Slope can determine how quickly a fire spreads. Fire typically burns faster uphill, because it can pre-heat the fuels above with rising hot air, and upward drafts are more likely to create fire spots. (National Park Service 2022). Areas containing steep, rugged terrain can also hinder access and the use of heavy firefighting equipment, posing additional difficulties for firefighting efforts. Following severe wildfires, sloping terrain is also more susceptible to landslide or flooding from increased runoff during substantial precipitation events. Landslides and surficial slope failure are most likely to occur in areas with more than 25 percent slope (hillside areas) and along steep bluffs.

Elevation affects fire behavior by influencing the timing and amount of precipitation as well as exposure to prevailing winds. Aspect is the direction a slope faces, which determines how much radiated heat the slope will receive from the sun. Slopes facing south to southwest will receive the most solar radiation; thus, they tend to be warmer and the vegetation drier than on slopes facing a northerly to northeasterly direction, creating a higher potential for wildfire ignition and spread (University of California, Berkeley 2018).

The project site is located within a developed and urban area of the City of Santa Rosa. Topography across the site is relatively flat with the surrounding area including no substantial slopes or steep topographic features. Due to the limited slope gradients, topography would not substantially influence wildfire behavior at the project site. In general, steeper slopes can accelerate fire spread and limit access for firefighting equipment; however, these conditions are not present within the project area. Slope conditions at the site also do not present constraints related to erosion or drainage beyond typical urban stormwater considerations, which are addressed through existing and proposed stormwater infrastructure.

Weather and Atmospheric Conditions

Wind, temperature, and relative humidity are the most influential weather elements in fire behavior and susceptibility (National Parks Service 2022). Fire moves faster under hot, dry, and windy conditions. Wind may also blow embers ahead of a fire, causing its spread. Drought conditions lead to extended periods of excessively dry vegetation, increasing the fuel load and ignition potential.

The National Oceanic and Atmospheric Administration (NOAA) maintains a weather monitoring station in Santa Rosa. Most precipitation is received from November through March, with an average annual rainfall of approximately 34 inches (NOAA 2021). May through September is the driest time of the year and coincides with what has traditionally been considered the fire season in California. However, increasingly persistent drought and climatic changes in California have resulted in drier winters, and fires during the autumn, winter, and spring months are becoming more common.

Power Lines

Above-ground power lines have the potential to contribute to wildfire risk, especially when they are near or traverse wilderness areas. In some instances, high winds can blow nearby trees and branches into powerlines, sparking fires. Wind can also snap wooden poles, causing live wires to fall onto nearby grass or other fuel, igniting it. While the California Public Utilities Commission (CPUC) estimates only about 10 percent of California's wildfires are triggered by power lines, the frequency and severity of these wildfires has spurred the agency to make new requirements for power line safety practices (Atkinson 2018).

c. Wildfire Hazard Designations

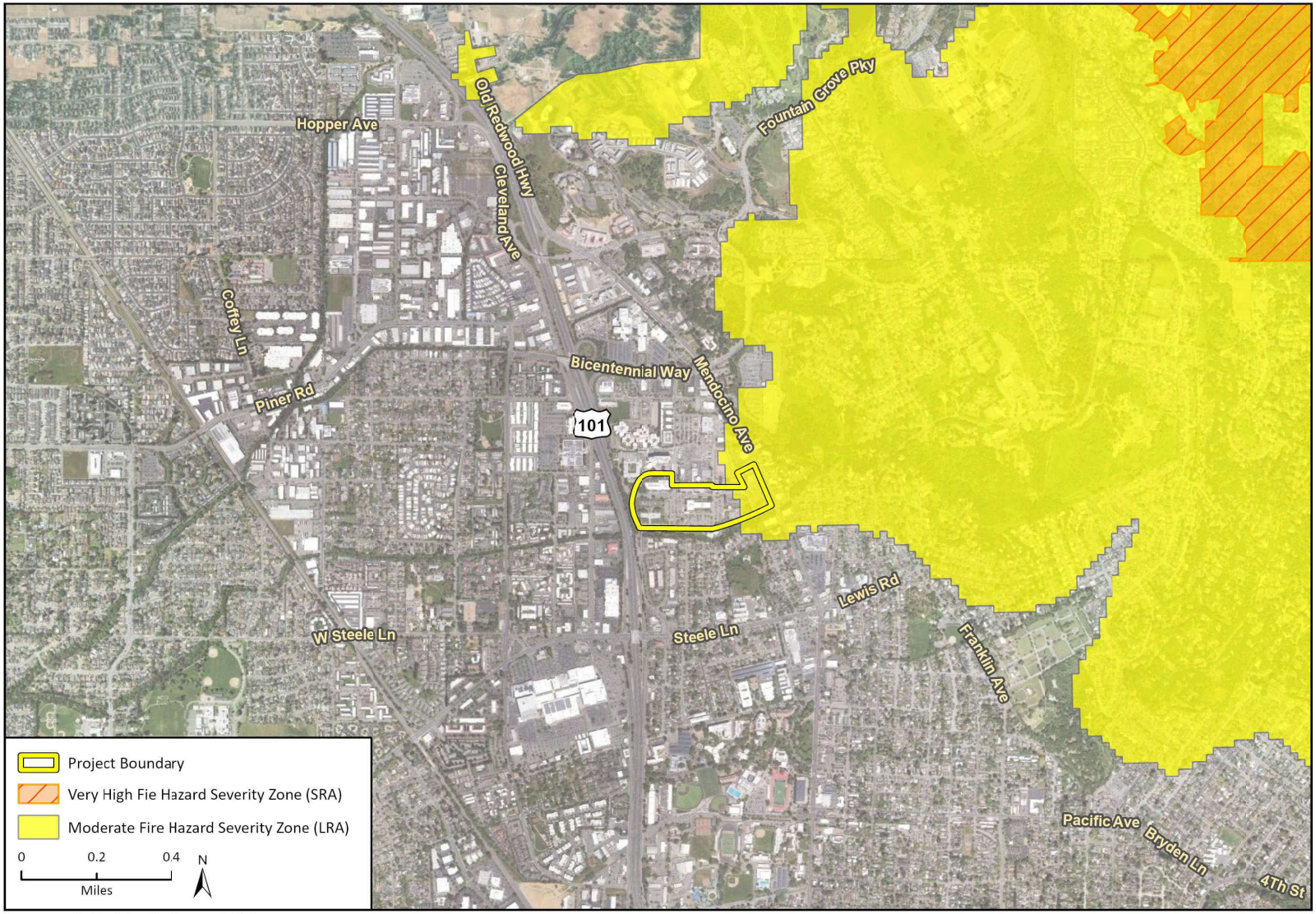
In California, responsibility for wildfire prevention and suppression is shared by federal, state and local agencies. Federal agencies are responsible for federal lands in Federal Responsibility Areas. The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of statewide interest and have classified those lands as State Responsibility Areas (SRA), which are managed by the California Department of Forestry and Fire Protection (CAL FIRE). All incorporated areas and other unincorporated lands are classified as Local Responsibility Areas (LRA).

While nearly all of California is subject to some degree of wildfire hazard, there are specific features that make certain areas more hazardous. CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather and other relevant factors (Public Resources Code [PRC] Sections 4201-4204 and California Government Code Sections 51175-89). As described above, the primary factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. CAL FIRE maps fire hazards based on zones, referred to as Fire Hazard Severity Zones (FHSZs). CAL FIRE maps three zones on SRA: 1) Moderate FHSZs; 2) High FHSZs; and 3) Very High FHSZs.

Each of the FHSZs influence how people construct buildings and protect property to reduce risk associated with wildland fires. However, none of the fire zones specifically prohibit development or construction. To reduce fire risk under state regulations, areas in Very High FHSZs must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life in those areas.

The project site is located within a LRA and there are no SRA FHSZs within the project site. The nearest SRA is located approximately 1.4 miles north of the project site, as shown on Figure 4.16-1.

Figure 4.16-1 Fire Hazard Severity Zones within the Project Site



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Additional data provided by FRAP, 2025.

21-11603 EPS
Fig 4.17-1 Fire Hazard Severity Zone

d. Sonoma County Wildfire History

Between 1976 and 2025, Sonoma County has experienced numerous wildfires of varying size and intensity. Historical fire perimeter data compiled by CAL FIRE indicate that wildfire activity has been present throughout the county since at least the mid-20th century, with multiple incidents recorded each decade and accelerating after 2017.

Several significant wildfire events have occurred within or near developed areas of Sonoma County. The 2017 Sonoma Fires including the Tubbs, Nuns, and Pocket Fires burned tens of thousands of acres across Sonoma and Napa counties; the Tubbs Fire alone burned over 36,800 acres, destroyed more than 5,630 structures, and resulted in 22 fatalities, making it one of the most destructive wildfires in California history at the time (CAL FIRE 2019a). More recently, the 2019 Kincade Fire burned approximately 77,700 acres in northern Sonoma County, and the 2020 Glass Fire and LNU Lightning Complex Fires burned tens of thousands and hundreds of acres, respectively, across the North Bay region, damaging or destroying structures and prompting widespread evacuations (CAL FIRE 2020, 2022a, 2023a).

Fire hazard in Sonoma County is further characterized through FHSZ mapping prepared by CAL FIRE, which classifies areas as Moderate, High, or Very High hazard based on fuel loading, topography, weather, and fire history. These maps indicate that areas along the wildland–urban interface (WUI), particularly in eastern and northern portions of the county, are subject to elevated wildfire hazard levels.

e. Post-fire Slope Instability and Drainage Pattern Changes

Vegetation loss from wildfire scarring of the landscape can result in slope instability in the form of more intensive flooding and landslides. These post-fire slope soils and altered drainage patterns can result in soil creep on downslope sides of foundations and reduce lateral support. Additionally, as vegetation and soil layers burn, they can create hydrophobic or water-repellent soil conditions. This hydrophobic zone manifests as a distinct layer within or parallel to the soil surface, where organic compounds with hydrophobic properties coat the soil. This phenomenon occurs when temperatures range between 176 to 288 degrees Celsius (approximately 349 to 550 degrees Fahrenheit). Hydrophobic soils create a barrier against water infiltration, effectively sealing off the soil during rainfall, which leads to heightened post-fire surface runoff and erosion (Western Fire Chiefs Association 2025). As detailed in Section 4.6, *Geology and Soils,* the project site is located within low landslide susceptibility areas due to its flat terrain.

4.16.2 Regulatory Setting

a. Federal Regulations

The Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 requires a state-level mitigation plan as a condition of disaster assistance. There are two different levels of state disaster plans: “Standard” and “Enhanced.” States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also established new requirements for local mitigation plans.

National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. Its intent was to establish plans for active response to severe wildfires and their impacts to communities, while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability. The plan promotes close coordination among local, state, tribal, and federal firefighting resources by conducting training, purchasing equipment, and providing prevention activities on a cost-share basis. To help protect people and their property from potential catastrophic wildfire, the National Fire Plan directs funding to be provided for projects designed to reduce the fire risks to communities. High-risk communities identified in the wildland-urban interface, the area where homes and wildlands intermix, were published in the Federal Register in 2001. Communities across Sonoma County are identified as communities at risk.

National Fire Code

The National Fire Protection Association's (NFPA) National Fire Code establishes a comprehensive set of standards designed to prevent fire ignition, minimize fire spread, reduce structural vulnerability, and improve emergency response across all building types and land uses. These standards, including widely adopted codes such as NFPA 1 (Fire Code) and NFPA 101 (Life Safety Code), establish minimum requirements for fire prevention practices, fire protection systems, emergency planning, safe building design, and effective evacuation, supporting consistent fire-safety implementation nationwide and include specialized codes such as those governing electrical safety, fire sprinklers, and flammable materials. The National Fire Code provides the technical framework that state, local, and federal agencies rely on when developing fire-resistant construction requirements, defensible space policies, and emergency planning procedures that align with broader federal wildfire-mitigation strategies, such as the National Fire Plan.

b. State Regulations

California Board of Forestry

The Board of Forestry maintains fire safe road regulations as part of Title 14 of the California Code of Regulations (CCR). This includes requirements for road width, surface treatments, grade, radius, turnarounds, turnouts, structures, driveways, and gate entrances with SRAs. These regulations are intended to ensure safe access for emergency wildland fire equipment and civilian evacuation.

California Code of Regulations, Title 14

The CCR, Title 14, Division 1.5 provides fire safe regulations related to emergency access, address signage, and water standards. These regulations establish minimum wildfire protection standards for construction and development within the SRA and Very High FHSZs. The standards include basic emergency access and perimeter wildfire protection measures, signage and building numbering, water supply resources for emergency fire use, and vegetation modification. They also include a minimum setback of 30 feet for all buildings from property lines and/or the center of a road and provide defensible space requirements for areas within 30 feet of a structure (Zone 1) and between 30 and 100 feet from a structure (Zone 2).

California Fire Code

The California Fire Code (CFC) is Chapter 9 of CCR Title 24 and is based on the International Fire Code. The CFC establishes the minimum requirements consistent with nationally-recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises and to provide safety and assistance to firefighters and emergency responders during emergency operations. The CFC uses a hazard classification system to determine what protective measures are required to ensure fire safety and protect lives. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure these safety measures are met, the CFC employs a permit system based on hazard classification.

More specifically, CFC Chapter 8 addresses fire-related interior finishes; Chapter 9 addresses fire protection systems; and Chapter 10 addresses fire-related means of egress. CFC Chapter 49 also contains regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings in FHSZs in SRAs, LRAs, and wildland-urban interface fire areas.

California Building Code: Wildland-Urban Interface Building Standards

On September 20, 2007, the California Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending CCR, Title 24, Part 2, known as the California Building Code (CBC), to include wildland-urban interface standards. The provisions of the CBC apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout California. The wildland-urban interface standards include provisions for ignition-resistant construction standards in the wildland-urban interface and use a hazard classification system to determine what protective measures are required to ensure fire safety and protect lives. Specifically, CBC Chapter 7A addresses materials and construction methods for exterior wildfire exposure.

California Strategic Fire Plan

The 2019 Strategic Plan prepared by CAL FIRE and the California Natural Resources Agency lays out central goals for reducing and preventing the impacts of fire in the state. The goals are meant to establish a natural environment that is more resilient and human-made assets that are more resistant to the occurrence and effects of wildland fire through local, state, federal, and private partnerships (CAL FIRE 2019b). In addition to the 2019 Strategic Plan for California, individual CAL FIRE units develop fire plans, which are strategic documents that establish a set of tools for each CAL FIRE unit for its local area. Updated annually, unit fire plans identify wildfire protection areas, initial attack success, assets and infrastructure at risk, pre-fire management strategies, and accountability in their unit's geographical boundaries. The unit fire plan identifies strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work locally. The unit fire plans include contributions from local collaborators and stakeholders and are aligned with other plans applicable to the area.

California Office of Emergency Services

The California Office of Emergency Services (CalOES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a

hazard mitigation strategy. The SHMP is federally required under the Disaster Mitigation Act of 2000 for the State to receive Federal funding. The Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

State Emergency Plan

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

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

The State of California Emergency Plan describes how response to natural or human-caused emergencies occurs in California. The plan is a requirement of the California Emergency Services Act and describes methods for conducting emergency operations, the process for rendering mutual aid, emergency services of government agencies, how resources are mobilized, how the public is informed, and how continuity of government is maintained during emergency. The State of California Emergency Plan further describes hazard mitigation (actions to reduce risk), as well as preparedness and recovery from disasters (CalOES 2017).

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

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by California Government Code Section 8607(a) for managing emergencies involving multiple jurisdictions and agencies. The SEMS incorporates the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and State. CalOES divides the state into several mutual aid regions. The project site is located in Mutual Aid Region IV, currently coordinated by John Stone (CalOES 2024).

California Public Resource Code

The California PRC includes fire safety regulations for forest, range, and forage lands that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that use an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that

- On days when a burning permit is required, flammable materials shall be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and fire suppression equipment shall be available in the immediate area (PRC Section 4427)
- During the highest fire danger period from April 1 to December 1, no person except for an emergency crew member or those under or contracted with a publicly or privately-owned utility shall use tools powered by an internal combustion engine in any industrial operation located on or near any forest, brush, or grass-covered land, and appropriate fire suppression equipment shall be made immediately available (PRC Section 4428)
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines shall not be used within 25 feet of any flammable materials (PRC Section 4431)
- Earthmoving and portable equipment with internal combustion engines must be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC Section 4442)

In addition, PRC Section 4290 establishes minimum wildfire protection standards in conjunction with building, construction, and development in SRAs and Very High FHSZs in LRAs. Under PRC Section 4290, the design and construction of structures, subdivisions, and developments in SRAs must provide for basic emergency access and specified perimeter wildfire protection measures. These measures provide for road standards for emergency access, signing and building numbering, water supply reserves, and fuel breaks and greenbelts and are known as the State Minimum Fire Safe Regulations.

Executive Order N-05-19

On January 9, 2019, Governor Gavin Newsom issued Executive Order N-05-19 to address wildfire in California. Executive Order N-05-19 directs CAL FIRE, in consultation with other state agencies and departments, to recommend immediate-, medium-, and long-term actions to help prevent destructive wildfires. In response, CAL FIRE created the Community Wildfire Prevention and Mitigation Report, which contains recommendations to reduce the damage from wildfires across the state. Specifically, they focus on reducing wildfire fuel (such as vegetation clearing), long-term community protection (creating defensible space in communities), wildfire prevention, and forest health (CAL FIRE 2023b).

c. Regional and Local Regulations

Association of Bay Area Governments Multi-Jurisdictional Local Hazard Mitigation Plan

The Association of Bay Area Governments' Multi-Jurisdictional Local Hazard Mitigation Plan includes mitigation measures that should be adopted by participating municipalities across the San Francisco Bay Area. The mitigation measures focus on hazards such as earthquake, fire, flood, and tsunami. The ABAG hazard mitigation planning process provided local governments with the tools necessary to meet federal hazard mitigation planning requirements, and this regional template has been used by numerous counties and cities within the ABAG planning area, including Santa Rosa.

Sonoma County Multi-Jurisdictional Hazard Mitigation Plan

The Sonoma County Multi-Jurisdictional Hazard Mitigation Plan was developed through a collaborative process involving Sonoma County, local jurisdictions, special districts, and partner agencies, with input from stakeholders and the public. The purpose of the plan is to reduce the long-term risk to people, property, infrastructure, and the environment from natural hazards. The plan identifies and evaluates hazards affecting the County including wildfire, flooding, earthquakes, landslides, and climate-related hazards assesses vulnerabilities, and defines assets at risk. It also establishes mitigation goals, policies, and actions for participating jurisdictions, and provides a framework for implementation, monitoring, and periodic updates to improve community resilience and disaster preparedness (Sonoma County 2025).

Sonoma County Community Wildfire Protection Plan

The Sonoma County Community Wildfire Protection Plan was developed with input from many organizations including state and local fire departments, federal agencies, community groups, and land management agencies. The purpose of the Sonoma County Community Wildfire Protection Plan is to help reduce the potential loss of human life and damage to property, natural and cultural resources within Sonoma County due to wildfire. The plan describes the wildfire risk and potential throughout the County, designates WUI areas, discusses assets at risk throughout the County, provides mitigation strategies, and discusses resources available (Fire Safe Sonoma 2023).

Sonoma-Lake-Napa Unit Strategic Fire Plan

CAL FIRE developed the Sonoma-Lake-Napa Unit Strategic Fire Plan, adopted in 2022, which protects more than two million acres of the SRA in Sonoma, Napa, Lake, Yolo, Colusa, and Solano Counties (CAL FIRE 2022b). The goal of this strategic fire plan is to build resilience and resistance to damaging wildfires while recognizing fire's beneficial aspects to forestry and environment practices. This is completed through education and participation with communities, collecting data and proper record keeping, monitoring the effectiveness of the Sonoma-Lake-Napa Unit's programs, and identifying and improving areas of the WUI.

Sonoma County Department of Emergency Management

The Sonoma County Department of Emergency Management is responsible for the mitigation, preparedness, planning, coordination of response, and recovery activities related to county emergencies and disasters. The Department serves as the primary coordination point for emergency management's activities affecting more than one jurisdiction, and the unincorporated areas of the County. The Department became an independent County department in July 2019.

Sonoma County General Plan

The County's General Plan notes that to reduce the risk of fire damage in rural areas, the types and intensities of land uses should be limited. Wildfire hazards may be reduced by mitigation measures such as the removal of vegetation and installation of dependable water systems, but the hazards cannot be eliminated entirely. Rural development should be most restricted where natural fire hazards are high, fire protection is limited, and inadequate road access prevents timely response by firefighting personnel and rapid evacuation by residents. As a result, the General Plan land use densities restrict land uses and density in hazardous areas, thereby limiting the number of people

and buildings exposed to hazards. The Public Safety Element includes goals and policies to reduce damage from wildfires, including:

Goal PS-3: Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires.

> **Policy PS-3a:** Continue to use available information on wildland and structural fire hazards.
>
> **Policy PS-3b:** Consider the severity of natural fire hazards, potential damage from wildland and structural fires, adequacy of fire protection and mitigation measures consistent with the Public Safety Element in the review of projects.
>
> **Policy PS-3g:** Encourage continued operation of California Department of Forestry and Fire Protection (CalFire) programs for fuel breaks, brush management, controlled burning, revegetation, and fire roads.
>
> **Policy PS-3j:** Provide fire hazard information signs in Very High or High Fire Hazard Severity Zones in a manner consistent with Area Plans and that does not degrade Scenic Corridors and scenic views.
>
> **Policy PS-3k:** Work with the California Department of Forestry and Fire Protection (CalFire) to identify areas of high fire fuel loads and take advantage of opportunities to reduce those fuel loads, particularly in Very High or High Fire Hazard Severity Zones.

Goal LU-7: Prevent unnecessary exposure of people and property to environmental risks and hazards. Limit development on lands that are especially vulnerable or sensitive to environmental damage.

> **Policy LU-7d:** Avoid new commercial, industrial, and residential land use designations in areas subject to "high" or "very high" fire hazards, as identified in the Public Safety Element, unless the combination of fuel load, access, water supply, and other project design measures will reduce the potential fire related impacts of new development to insignificant levels.

Sonoma County Code

The Sonoma County Code, Chapter 13, Sonoma County Fire Code, outlines the CFC, as adopted with local amendments. Article V of Chapter 13 establishes minimum fire safe standards for development within the unincorporated County. Chapter 13 also requires fire sprinklers in residential developments and Chapter 13A requires removal of hazardous vegetation and combustible material from around the exterior of improvements in unincorporated areas of the County.

Santa Rosa City Code

The Santa Rosa City Code is not applicable to the project. However, relevant chapters of the Santa Rosa City Code are described here for informational purposes. Chapters 9-28 and 9-32 establish requirements intended to reduce wildfire risk within the City's Wildland-Urban Interface Fire Area. Chapter 9-28 regulates fuels mitigation pile burning by requiring permits from the Santa Rosa Fire Department, compliance with Bay Area Air Quality Management District regulations, site inspections, and implementation of fire safety measures such as defensible space, onsite water supply, and supervised burning activities. Chapter 9-32 requires ongoing hazardous vegetation and fuels management, including maintenance of defensible space, removal of dead or hazardous vegetation and trees, restrictions on combustible mulch near structures, and vegetation clearance

standards around structures and property lines. These ordinances are administered and enforced by the Fire Chief and are intended to reduce wildfire hazards, support emergency response, and protect life, property, and natural resources.

City of Santa Rosa General Plan 2050

Though not applicable to the County's project, the following objectives and policies of the Santa Rosa General Plan are applicable to projects that require City approval in the City limits, and are provided solely for informational purposes:

Goal 5-3: Increase community resilience to future wildfire threats.

> **Policy 5-3.2:** Increase wildfire resiliency using required and voluntary risk reduction regulations and strategies in addition to Title 14 of the California Code of Regulations.
>
> **Policy 5-3.3:** Promote new development in areas of the community that have lower risk of wildfire hazards (outside of the WUIFA).
>
> **Policy 5-3.4:** Implement the vegetation management strategies and enhanced roadway standards in fire-prone areas through the City's Community Wildfire Protection Plan.

4.16.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The assessment of impacts related to wildfire hazards and risks were evaluated using CAL FIRE FHSZ mapping for Santa Rosa, aerial imagery, and topographic mapping. Weather patterns related to prevailing winds and precipitation trends were evaluated as they relate to the spread and magnitude of wildfire. CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. Consequently, impacts under the thresholds identified below would only be considered significant if the proposed project risks exacerbating those existing environmental conditions.

Significance Thresholds

The following thresholds of significance are based on Appendix G to the *CEQA Guidelines*. For purposes of this EIR implementation of the proposed project may have a significant adverse impact if it would do any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan;
2. 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;
3. 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;
4. 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;
5. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact W-1 THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

As discussed above under Section 4.16.1, *Setting*, the project site is located within an LRA and the nearest SRA Very High Fire Hazard Severity Zone (VHFHSZ) is located approximately 1.4 miles north of the project site. Fire protection services for the project site are provided by the Santa Rosa Fire Department, in coordination with Sonoma County fire and emergency services agencies. The nearest fire station is located approximately 0.65 miles northeast.

Sonoma County Code Chapter 13, Fire Safety Ordinance adopts and amends the CFC and establishes Fire Safe Standards, including requirements for emergency access, roadway widths, water supply, and site design to ensure adequate evacuation and emergency response. In addition, the Sonoma County Operational Area Emergency Operations Plan (EOP) and the County's Multi-Jurisdictional Hazard Mitigation Plan establish procedures and coordination protocols for evacuation, emergency access, and disaster response throughout the County.

Main transportation routes are identified in the County's EOP, including Highway 101, State Route 12, State Route 116, State Route 37, State Route 128, and State Route 1. No designated evacuation routes are presented in the EOP, as evacuation practices may vary depending on the type, severity, and availability of primary roadways. In an emergency evacuation scenario, many of the main transportation routes identified in the EOP and listed above would be relied on as evacuation routes assuming viability of those routes.

The project site is currently served by multiple points of access via Administration Drive, Ventura Avenue, County Center Drive, and Mendocino Avenue, with direct connections to regional routes including Highway 101. These roadways provide both inbound and outbound circulation and are part of a well-connected urban grid network that supports multiple evacuation routes. During construction, temporary access conditions may include lane closures or construction-related traffic; however, adherence to standard construction traffic control plans and implementation of applicable best management practices (BMPs) would ensure that clear and unobstructed emergency access is always maintained. Once constructed, the project would maintain and improve existing access conditions. Site access would be designed in accordance with applicable County and City standards, and internal circulation would accommodate emergency vehicles. The surrounding roadway network would continue to provide multiple evacuation routes toward Highway 101 and other regional corridors.

The project would introduce additional residents, employees, and visitors. However, as discussed within the Evacuation Travel Time Assessment prepared by Fehr & Peers, the evacuation travel time assessment prepared for the project determined that the project would result in an increase in total evacuation time of less than 15 minutes under two potential fire scenarios (Appendix N). Both the Northeast Fire Scenario and Southeast Fire Scenario would result in less than 15-minute increases, which is below the model resolution and is considered operationally negligible, as shown in Table 4.16-1.

Table 4.16-1 Summary of Fire Evacuation Travel Time Estimates

	Total Elapsed Time to Exit Evacuation Area[1]		
Scenario	**No Project**	**Plus Project**	**Delta**
Northeast Fire Scenario			
Base Year 2025	4 hours, 15 minutes	4 hours, 15 minutes	<15 minutes
Cumulative Year 2040	6 hours, 30 minutes	6 hours, 30 minutes	<15 minutes
Southeast Fire Scenario			
Base Year 2025	3 hours, 30 minutes	3 hours, 30 minutes	<15 minutes
Cumulative Year 2040	5 hours, 30 minutes	5 hours, 30 minutes	<15 minutes

[1] Times are provided to the nearest 15 minutes
Source: Appendix N

As seen in Table 4.16-1, the project would contribute to an increase in travel time to exit the evacuation area of less than 15 minutes, which is the minimum resolution of the evacuation model. The 15-minute resolution of the model balances transportation engineering simulation capabilities with the unknowns inherent in wildfire evacuation modeling and analysis. These results are reasonable given the large geographic area of the evacuation event and the numerous evacuation routes across the roadway grid network to the south, southwest, and west of the project site. Overall, the analysis found that changes in traffic congestion during both evacuation scenarios would be minimal and not perceptible to evacuees.

In addition, the project includes the development of an Emergency Coordination Center, of which up to 5,000 gross square feet would be dedicated to emergency operations, while the remainder would function as conference rooms during non-emergencies. During emergencies, the entire building would function to respond to disasters. Walls between conference rooms would be foldable to allow the building to operate as a single space during emergencies. This would further support and enhance County emergency response and disaster management capabilities during emergency situations.

The project would be subject to and consistent with the County's EOP, Community Wildfire Protection Plan, and Multi-Jurisdictional Hazard Mitigation Plan, which include evacuation planning, emergency coordination, and resource deployment strategies that reduce risks associated with wildfire and other hazards. Therefore, the project would not conflict with emergency response and evacuation plans and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Would the project 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?

Impact W-2 THE PROPOSED PROJECT, WHICH IS LOCATED WITHIN A MAPPED LRA, WOULD NOT EXACERBATE WILDFIRE RISKS AND WOULD NOT EXPOSE PROJECT OCCUPANTS TO POLLUTANT CONCENTRATIONS FROM A WILDFIRE OR THE UNCONTROLLED SPREAD OF A WILDFIRE DUE TO SLOPE, PREVAILING WINDS, AND OTHER FACTORS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

Presently, the project site is developed with existing County government office buildings and surface parking areas associated with the County Administration Center. The project site is bound by Bicentennial Way to the north, Steele Lane to the south, Mendocino Avenue to the east, and Highway 101 to the west, and is served by multiple internal and adjacent roadways including Administration Drive, Ventura Avenue, County Center Drive, and Professional Drive. Surrounding land uses consist primarily of governmental, institutional, commercial, and residential uses, including court facilities, office buildings, and nearby residential neighborhoods.

As described previously in Section 4.16.1,*Setting*, the project site is relatively flat terrain within an urbanized area and does not contain steep slopes or significant topographic variation that would contribute to wildfire behavior. The site is previously graded, largely developed and disturbed, with minimal native vegetation and no substantial wildland fuel loads. As shown in Figure 4.16-1 the site is not located within an SRA FHSZ. The site is within an LRA, and while LRA FHSZs occur within Sonoma County, the nearest SRA is located approximately 1.4 miles north of the project site. While Sonoma County is subject to regional wind events (e.g., Diablo winds), these conditions influence wildfire behavior at a regional scale and are not driven by site-specific development within urban areas. The project would not introduce features that would alter wind patterns or increase fire spread. The site's urban setting, lack of continuous vegetation, and separation from wildland interface areas reduce the potential for wildfire ignition and spread relative to more rural or hillside environments.

Construction of the proposed project would involve demolition of existing structures and construction of new office, residential, retail/commercial, and supporting facilities. During construction, there would be a temporary increase in human activity and potential ignition sources, including construction equipment and vehicles that could produce sparks or heat. However, compliance with applicable fire safety regulations, construction BMPs, and standard safety requirements (e.g., equipment maintenance, fire extinguishers, and fire watch measures during high fire risk conditions, such as onsite monitoring for ignition sources and suspension of spark-generating activities during Red Flag Warning events) would minimize the risk of ignition, therefore the potential for wildfire ignition and spread during construction would be low.

Operation of the project would introduce new buildings, residents, employees, and associated activities; however, the developed nature of the site and surrounding area would not result in an increase in wildfire risk. New development would be required to comply with the CFC, Sonoma County Fire Code (Chapter 13), and applicable CBC standards, which incorporate fire-resistant construction, fire suppression systems (e.g., sprinklers), adequate emergency access, and water supply requirements for fire protection. These requirements reduce the potential for ignition, fire spread, and risk to occupants.

The project would also be subject to the Sonoma County Safety Element, EOP, and the Multi-Jurisdictional Hazard Mitigation Plan, which include policies and procedures for wildfire risk reduction, emergency preparedness, and coordinated evacuation planning. Additionally, the project includes development of an ECC, which would enhance County-wide emergency response capabilities during wildfire and other disaster events. While occupants of the project could be exposed to wildfire smoke during regional wildfire events, such exposure would be similar to that experienced by the surrounding community and would not be exacerbated by project design, location, or site conditions. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

Impact W-3 THE PROPOSED PROJECT, WHICH IS LOCATED WITHIN AN LRA, WOULD NOT REQUIRE THE INSTALLATION OR MAINTENANCE OF ASSOCIATED INFRASTRUCTURE WHICH WOULD EXACERBATE FIRE RISK. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

Existing utilities serving the project site include municipal water, wastewater, stormwater, electrical, natural gas, and telecommunications infrastructure provided by the City of Santa Rosa and regional service providers, with existing water mains and utility lines located along Ventura Avenue and surrounding roadways. The project site is currently served by a network of developed public roadways and internal access drives, including Administration Drive, Ventura Avenue, County Center Drive, and Mendocino Avenue, with regional access by Highway 101.

The proposed project would occur in an urbanized area which already contains existing utility infrastructure. As a result, minimal additional infrastructure, such as roads, fuel breaks, emergency water sources, power lines or other utilities, would be required to accommodate development facilitated by proposed project. Rather, the proposed project would require lateral infrastructure connections to existing utilities, resulting in negligible temporary or ongoing environmental impacts. All utilities would be constructed in accordance with applicable local and state regulations governing utility design, fire safety, and infrastructure resilience and installation of the proposed infrastructure would occur entirely within the project site and along existing developed corridors.

In addition, the project includes provision of adequate water supply and fire protection infrastructure, consistent with applicable fire codes and standards. Installation of fire protection systems, including hydrants and on-site fire suppression systems, would enhance firefighting capabilities and reduce wildfire risk compared to existing conditions. The project includes a solar microgrid with battery storage over covered parking areas, which would improve energy resilience and reduce reliance on external power sources during emergency conditions. Furthermore, the

project would also include improvements to on-site circulation and access that would maintain or enhance emergency vehicle access throughout the site.

The project would be consistent with the Sonoma County Safety Element, EOP, and Fire Code requirements, which require adequate emergency access, utility reliability, and fire protection infrastructure for new development. No additional ongoing impacts to the environment would occur beyond those discussed throughout this document. The proposed project would require minimal additional utility infrastructure, and existing regulations would ensure development facilitated by the proposed project would not result in substantial fire risk or temporary or ongoing impacts to the environment. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4:	Would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact W-4 THE PROPOSED PROJECT, WHICH IS LOCATED IN AN LRA, WOULD NOT EXPOSE PEOPLE OR STRUCTURES TO SIGNIFICANT RISKS, INCLUDING DOWNSLOPES OR DOWNSTREAM FLOODING OR LANDSLIDES, AS A RESULT OF RUNOFF, POST-FIRE SLOPE INSTABILITY, OR DRAINAGE CHANGES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

Vegetation on hillslopes helps to stabilize soil, slow water flow, and support percolation into the soil. Severe wildfires damage trees, the shrub canopy, vegetation, and soil. Once vegetation burns, a greater surface area of soil is exposed to the elements, and the lack of roots decreases the structural integrity of the soil. Thus, wildfire burn areas typically endure an increased runoff after intense rainfall, which can put residences and structures downslope of a burned area at risk of localized floods and landslides.

As discussed in Section 4.6, *Geology and Soils*, the project site is not located within a landslide hazard zone and has low susceptibility to landslides because it is relatively flat and not adjacent to slopes. In addition, the proposed project would not construct steep slopes or hills that could increase landslide risk. Vegetation at the project site is limited and largely consists of landscaped or disturbed areas, rather than continuous native vegetation on slopes. As such, post-fire loss of vegetation would not expose large areas of unstable soil or create conditions conducive to debris flows or slope failure. In addition, the project would not involve the creation of steep slopes or placement of structures downslope of fire-prone hillside areas. Therefore, the proposed project would not directly or indirectly cause substantial adverse effects related to landslides.

As discussed in Section 4.9, *Hydrology and Water Quality*, construction of the proposed project would be required to comply with the State Water Resources Control Board Construction Stormwater General Permit, including preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would identify construction BMPs to minimize erosion,

sedimentation, and pollutant discharge during grading and other ground-disturbing activities. In addition, the project would incorporate proper site preparation, grading, drainage, and erosion control measures to stabilize disturbed areas and manage surface runoff. With implementation of these measures, the proposed project would minimize the potential for excessive runoff, erosion, and degradation of water quality during construction.

The proposed project would be required to adhere to the standards of the CBC and Sonoma County Code, Chapter 13, Sonoma County Fire Code, which outlines the CFC. The proposed project would be required to adhere to these State and County regulations which would ensure the proposed project would not expose people or structures to substantial flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Impacts would be less than significant without mitigation..

Threshold 5:	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Impact W-5 THE PROJECT SITE IS NOT NEAR A WILDLAND AREA AND WOULD NOT EXPOSE PEOPLE OR STRUCTURES, EITHER DIRECTLY OR INDIRECTLY, TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Overall Project (Office and Residential Sites)

The project site is not located within a SRA or lands classified as a VHFHSZ. The site however is within a LRA, and while LRA Fire Hazard Severity Zones occur within Sonoma County, the nearest SRA is located approximately 1.4 miles north of the project site. Existing residential and commercial development, as well as Highway 101 to the west and the surrounding urban roadway network, separate the project site from higher wildfire hazard areas. Due to the distance and intervening urban development between the project site and nearby wildland fire hazard areas, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.16.4 Cumulative Impacts

The geographic scope of the cumulative wildfire analysis is the entirety of Sonoma County. The area comprising Sonoma County is appropriate for the wildfire cumulative impacts analysis, because it contains tracts of wildland fuels, such as forest land and chaparral that are also in or adjacent to the

City of Santa Rosa where the project site is located. In other words, there are substantial numbers of fire breaks across the county, such as Highway 1 and Highway 101, and developed areas, such as Windsor, Cloverdale, Rohnert Park and Petaluma, that potential wildfires in or near the project site would generally be in or spread into, or from, surrounding Sonoma County. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*).

As concluded in Section 4.16.3 *Impact Analysis*, the proposed project would have a less-than-significant impact related to wildfires. Adherence to State, regional, and local fire protection policies and requirements would ensure potential impacts related to wildfire are minimized for development facilitated by the proposed project. Additionally, the proposed project largely focuses development in urbanized areas, away from continuous fuels and slopes.

Cumulative plans and projects would result in predominantly infill development and would not significantly increase development in hillside and WUI areas containing elevated fire risk. Cumulative project construction would adhere to the applicable Building Code that are designed to minimize the potential for uncontrolled fires, and development within WUI areas would be subject to greater restrictions outlined in the Building and Fire Codes. Adherence to the applicable Building Code would ensure that CFC standards such as automatic sprinkler systems are included in development. Therefore, cumulative wildfire impacts would not be significant.

Additionally, as discussed in Section 4.13, *Public Services*, as part of individual project approval for cumulative development facilitated by the project, the City and County would assess the need for fire protection services, which would inform efforts to improve or expand needed facilities. Cumulative development would comply with emergency access requirements as directed by the jurisdictional agency and fire department regulations. Furthermore, the cumulative projects would not result in permanent road closures, nor impede an established emergency or evacuation access route, such as Highway 101, or interfere with emergency response requirements, such as fire protection response time standards. As such, the project would not result in a considerable contribution to cumulative wildfire impacts.

4.17 Effects Found Not to be Significant

During evaluation of the proposed project, certain impact areas included in the California Environmental Quality Act (CEQA) Appendix G checklist were found to have a less than significant impact or no impact. As allowed under *CEQA Guidelines* Section 15128, this section discusses why impacts to these environmental topics were determined to have a less than significant impact or no impact and therefore are not discussed in detail in the Draft Environmental Impact Report (EIR) as individual sections.

4.17.1 Agriculture and Forestry Resources

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

b. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

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

d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

e. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

There are no areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) within the project site (California Department of Conservation [DOC] 2024a). The project site and surrounding parcels are not subject to a Williamson Act contract (DOC 2024b). The project site and surrounding parcels are not zoned for agricultural use or forest land. The project site and surrounding parcels do not meet the definition of a forestry resource, as defined by California Public Resources Code section 12220(g); or timberland, as defined by Public Resources Code section 4526. Therefore, the proposed project would not result in the conversion of Farmland or agricultural to non-agriculture uses, or forest land to non-forest uses. There would be no impact on agriculture and forestry resources.

4.17.2 Mineral Resources

a. *Would the project result in a loss of availability of a known mineral resource that would be of value to the region and residents of the state?*

b. *Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

There are no mineral resources, existing mines, major mineral deposits, or critical minerals within the project area (United States Geological Survey 2024). There are no active mining operations on the project site. The proposed project would not impede or otherwise interrupt mining operations. The project activities would occur within already developed areas. Therefore, the project would have no impact on mineral resources.

4.17.3 Population and Housing

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

The project would result in the redevelopment and modernization of portions of the Sonoma County Administration Center. As described in Section 2.5.2, *Description of Project*, the project, once constructed, would accommodate the workforce currently present at the site plus an additional approximately 18 employees. The project also includes approximately 20,000 square feet of retail/commercial space resulting in roughly 32 new employees and up to 1,500 residential dwelling units on the eastern part of the site. This would result in 3,645 new residents based on the rate of 2.43 persons per average household according to California's Department of Finance (DOF) (DOF 2025). The estimated 3,645 residents plus the additional anticipated 50 employees (18 for the office site and 32 for the retail/commercial space), assuming they all move to the region for employment, would increase the current Central Sonoma County (with populations primarily consisting of the Cities of Santa Rosa and Sebastopol) population from 182,185 to 185,880 which remains below the Association of Bay Area Governments (ABAG) Plan Bay Area 2050 projection of 239,120 residents[1]. The housing and population growth expected from the project is within the range ABAG has planned for the City and County.

The primary purpose of the project is to modernize and improve workplace accessibility to improve operational efficiency, rather than expanding the scope or capacity of County services. The proposed new County administration center is designed to replace outdated buildings and accommodate current and anticipated needs of County operations. The project site is currently developed with County administration buildings. Therefore, the project would not require extension of new roads or utilities into undeveloped areas and potentially facilitate unplanned growth indirectly. Accordingly, this impact would be less than significant.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The proposed project would not displace existing housing or people, as the site is currently developed with County administrative buildings and related facilities. The redevelopment and modernization of the Sonoma County Administration Center would occur within the area currently developed with County administration buildings, and the proposed residential site of the project would supplement, rather than replace, housing in the area. As a result, the project would not necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

[1] Calculation was based on the ABAG Plan Bay Area 2050 projection for Central Sonoma County and the DOF Sonoma County person per household number (ABAG 2021; DOF 2025)

5 Other CEQA Required Discussions

This section discusses growth-inducing impacts, irreversible environmental impacts, and significant, unavoidable impacts that would be caused by the proposed project.

5.1 Growth Inducement

There are two types of growth-inducing impacts that a plan or project may have: direct and indirect. To assess the potential for growth-inducing impacts, the proposed project's characteristics that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated. *CEQA Guidelines* Section 15126.2(d) requires a discussion of a proposed plan or project's potential to foster economic or population growth, including ways in which a plan could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The *CEQA Guidelines*, as interpreted by the County, state that a significant growth-inducing impact may result if the proposed plan would:

- Induce substantial population growth in an area (for example, by proposing or facilitating new residences or employment-generating uses beyond the land use density/intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; and/or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list, when such infrastructure exceeds the needs of a project and could accommodate unplanned future development.

Direct growth-inducing impacts occur when the implementation of a plan or project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional developments in the same area. Also included in this category are plans or projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure cannot be considered isolated from the development they facilitate and serve. Plans or projects that physically remove obstacles to growth, or projects that indirectly induce growth, may provide a catalyst for future unrelated development in an area such as a new residential community that requires additional commercial uses to support residents.

5.1.1 Population and Employment Growth

As discussed in Section 4.16, *Population and Housing*, the proposed project has the potential to result in population growth, adding an estimated 3,645 new residents and approximately 50 employees to the County of Sonoma. The estimated population increase associated with the proposed project would increase the current Central Sonoma County (City of Santa Rosa and Sebastopol) population from 182,185 to 185,880, an approximately 2 percent increase, which remains below the ABAG Plan Bay Area 2050 projection of 239,120 residents (Association of Bay

Area Governments [ABAG] 2021).[1] The population increase associated with the project would therefore be within the population forecast for Central Sonoma County.

County of Sonoma currently has 474,574 housing units. The addition of 1,500 units would bring the total number of housing units to 476,074. The estimated housing unit increase associated with the proposed project would increase the current number Central Sonoma County households from 88,000 to 89,500, a 1.7 percent increase, which remains below the ABAG Plan Bay Area 2050 projection of 98,000 households (ABAG 2021). The population increase associated with the project would therefore be within the population forecast for Central Sonoma County.

The project site is currently developed with County-used government office buildings. The primary purpose of the project is to modernize and consolidate existing County-used government office buildings to improve operational efficiency, rather than expanding the scope or capacity of County services. The proposed new office buildings are designed to replace outdated buildings and accommodate current and anticipated needs of County operations. Therefore, the project would not require extension of new roads or utilities into undeveloped areas and potentially facilitate unplanned growth indirectly. Accordingly, this impact would be less than significant.

The proposed project would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, construction of the project would not be growth-inducing from a temporary employment standpoint. The proposed office site would accommodate an additional 18 employees compared to current conditions and would generate only a minimal increase in long-term employment. The residential site would include 1,500 residential units and accommodate approximately 32 additional employees associated with the retail/commercial component, also resulting in only a minimal increase in long-term employment. Overall, the overall project would add approximately 50 net new employees over existing conditions which would not induce substantial growth beyond that anticipated in adopted plans. Therefore, the project would not be growth-inducing from a long-term standpoint, and would not induce substantial economic expansion to the extent that direct physical environmental effects would result.

5.1.2 Removal of Obstacles to Growth

As discussed in Section 4.15, *Utilities and Service Systems*, of this EIR, the proposed project would not require new or expanded water, stormwater, wastewater, electricity, natural gas, or telecommunications facilities, and existing facilities would have sufficient capacity to serve the project. Improvements to water, stormwater, and wastewater connection infrastructure would not be required to support the project.

As discussed in Section 4.13, *Transportation*, of this EIR, the proposed project would include sidewalks along Mendocino Avenue, Administration Drive, and along the proposed roadways within the project site which would improve pedestrian connectivity in the area. However, these would exist within the current internal roadways and along existing roadways near the project site. The proposed project would not create barriers to growth within the City of Santa Rosa or Sonoma County.

[1] Calculation was based on the ABAG Plan Bay Area 2050 projection for Central Sonoma County and the DOF Sonoma County person per household number (ABAG 2021; DOF 2025)

5.2 Irreversible Environmental Effects

CEQA Guidelines Section 15162.2(d) requires a discussion of any significant irreversible environmental changes which would be caused by implementation of the proposed project. Such significant irreversible environmental changes may include the following:

- Use of non-renewable resources during the initial and continued phases of the project which would be irreversible because a large commitment of such resources makes removal or non-use unlikely.
- Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) which generally commit future generations to similar uses.
- Irreversible damage, which may result from environmental accidents associated with the project.

Construction and operation of the project would involve an irreversible commitment of construction materials and non-renewable energy resources. Construction of the proposed project would require building materials and energy, including non-renewable resources. Consumption of these resources would occur with any development in Santa Rosa and Sonoma County and are not unique to the proposed project.

The proposed project would also irreversibly increase local demand for non-renewable energy resources such as electricity. However, development would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, *California's Energy Efficiency Standards for Residential and Nonresidential Buildings*) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture. Consequently, the proposed project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable resources would be less than significant. Again, consumption of these resources would occur with any development in the region and is not unique to the proposed project.

Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutants and greenhouse gas emissions. As discussed in Section 4.2, *Air Quality*, and Section 4.7, *Greenhouse Gas Emissions*, of this EIR, development and operation of the proposed project would not generate air quality or GHG emissions that would result in a significant impact. Additionally, Section 4.12, *Transportation*, of this EIR concludes that long-term impacts associated with the proposed project would be less than significant based on applicable thresholds.

Growth accommodated by the proposed project would require an irreversible commitment of fire protection services, law enforcement, water supply, wastewater treatment, and solid waste disposal services, however, as described in Section 4.12, *Public Services*, and Section 4.15, *Utilities and Service Systems*, of this EIR, existing services would be adequate to support the proposed project and these impacts would be less than significant.

5.3 Significant Unavoidable Effects

CEQA Guidelines Section 15126.2(c) requires that an EIR identify significant impacts that a project would cause which cannot be reduced to less than significant with the application of mitigation measures. The implications and reasons why the project is being proposed, notwithstanding, must be described. As discussed in Section 4.1, *Aesthetics* (Impact AES-3), the residential site of the proposed project would result in a significant and unavoidable impact due to the absence of a finalized project design and the potential for the site to substantially alter the visual character in the project vicinity. Section 4.1, *Aesthetics* (Impact AES-3 and Impact AES-4), also identifies a significant and unavoidable impact associated with the residential site because a finalized project design is not currently available and the analysis conservatively assumes the potential for substantial additional sources of light and glare. Additionally, as described in Section 4.4, *Cultural Resources* (Impact CUL-1), the proposed project would result in a significant and unavoidable impact due to demolition of the Administration Building, which is considered a historical resource under CEQA. Implementation of mitigation measures would not reduce these impacts to a less-than-significant level. No other significant unavoidable impacts were identified in this EIR.

5.4 Mandatory Findings of Significance

CEQA Guidelines Section 15065 states that an agency must find that a project may have a significant effect on the environment and require preparation of an EIR if there is substantial evidence, in light of the whole record, that any of the following conditions may occur:

- The potential for the project 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;
- Project 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); and
- Environmental effects of the project which will cause substantial adverse effects on human beings, either directly or indirectly.

These conditions are known as Mandatory Findings of Significance. Section 15065 also requires that once an agency decides to prepare an EIR for a project, the agency must determine whether any of the above conditions will occur as a result of the project. This EIR discusses whether these conditions will occur in the following subsections:

- Section 4.3, *Biological Resources*, describes the project's potential effects of the project on plant and animal species populations, habitats, communities, and migratory patterns.
- Section 4.4, *Cultural Resources and Section* 4.14, *Tribal Cultural Resources*, describes the project's potential effects on important historic and prehistoric cultural and tribal cultural resources on the project site.

- The project's potential adverse environmental effects to human beings are discussed in Section 4.1, *Aesthetics*; Section 4.2, *Air Quality*; Section 4.6, *Geology and Soils*; Section 4.7, *Greenhouse Gas Emissions*; Section 4.8, *Hazards and Hazardous Materials*; Section 4.11, *Noise*; Section 4.13, *Transportation*; and Section 4.17, *Effects Found Not to be Significant*.

The environmental analysis sections of the EIR each conclude with a discussion of the project's contribution to cumulative effects.

Based on the analysis presented in this EIR, the proposed project would result in a significant and unavoidable impact to aesthetics and historical resources, as described in Section 4.1, *Aesthetics* (Impact AES-3 and AES-4) and Section 4.4, *Cultural Resources* (Impact CUL-1). Therefore, the project would have the potential to substantially degrade the quality of the environment as a result of these impacts. In addition, as discussed in Section 4.1, *Aesthetics* and Section 4.4, *Cultural Resources*, Cumulative impacts to aesthetics and cultural resources would be cumulatively considerable. Therefore, the project would have the potential to substantially degrade the quality of the environment. Accordingly, the project would result in a mandatory finding of significance related to impacts on aesthetics and historical resources.

6 Alternatives

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives (stated in Chapter 2 of this EIR) but would avoid or substantially lessen the significant adverse impacts.

As discussed in Chapter 2, *Project Description*, the objectives for the proposed project are as follows:

- Design and construct a new County Administration Center (CAC) to use County resources more efficiently;
- Provide housing opportunities for County employees;
- Provide housing opportunities for a variety of income levels, with an emphasis on affordable housing opportunities for low and very low income households;
- Provide housing consistent with Program 4c in the County's adopted Housing Element;
- Provide housing near jobs, transit, services, schools, and community-serving retail and/or retail/commercial establishments;
- Provide access to public transportation and SMART from County Administration Center;
- Implement goals, objectives, and policies of the Sonoma County General Plan focused on growth in established Urban Service Areas; and
- Modernize and improve workplace accessibility, seismic safety, and efficiency.

Alternatives Considered but Rejected

The County considered an alternative scenario that would limit proposed uses on the project site to strictly County office buildings without residential uses. This alternative was dismissed because it would not meet key Project Objectives. Notably, key objectives for the project include provide housing that supports the County's housing goals, provide housing opportunities for County employees, provide housing near jobs, and to further efficient land use consistent with adopted plans. An all-office option would eliminate the residential component central to the project's purpose and fail to satisfy a majority of the objectives. Therefore, a non-residential option was considered and dismissed due to its inability to meet most of the project objectives and applicable policy requirements.

6.1 Alternatives Analysis

Included in this analysis are four alternatives, including the CEQA-required "no project" alternative, that involve changes to the project that may avoid or substantially reduce the project-related environmental impacts as identified in this EIR and meet most of the project objectives. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project Alternative
- Alternative 2: 200-Unit Alternative

- Alternative 3: 650-Unit Alternative
- Alternative 4: Retention of the Administrative Building Alternative

Table 6-1 provides a summary comparison of the development characteristics of the proposed project and each of the alternatives considered. Descriptions of the alternatives are included before the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.1 through 6.4.

Table 6-1 Comparison of Project Alternatives' Buildout Characteristics

Project Feature	Proposed Project	Alternative 1: No Project	Alternative 2: 200-Unit Alternative	Alternative 3: 650-Unit Alternative	Alternative 4: Retention of the Administrative Building Alternative
Maximum Number of Stories for Residential Component	7 stories	N/A	4 stories	4 stories	4 stories
Number of Residential Units	1,500 units	None	200 units	650 units	650 units
Retail/Commercial Component	20,000 square feet	None	None	None	None
Construction of Updated Administrative Building	Yes	No	Yes	Yes	Yes
Demolish Existing Administrative Building	Yes	No	Yes	Yes	No

6.2 Alternative 1: No Project Alternative

6.2.1 Description

The No Project Alternative assumes that the proposed Sonoma County Government Center Project would not be implemented. Under this alternative, the project site would remain in its existing condition as part of the CAC, with multiple low-rise government office buildings and surface level parking. Buildings proposed for demolition under the proposed project would remain in use, and no new office building, Emergency Coordination Center (ECC), residential units, or retail/commercial uses would be constructed.

The No Project Alternative would not meet the Project Objectives. Specifically, it would not modernize County facilities, improve operational efficiency, provide new housing supporting the County's housing goals, provide housing for County employees, or provide housing near jobs. Additionally, no new sustainability features or infrastructure improvements would be implemented, and existing site conditions would remain unchanged.

6.2.2 Impact Analysis

a. Aesthetics

The No Project Alternative would retain the existing visual character of the CAC, including low-rise institutional buildings, surface parking lots, internal circulation roads, and landscaped areas. This alternative would not introduce new architectural elements, building massing, height, or lighting

that could alter the site's visual identity. As such, the existing visual setting, including views of and across the site, would be preserved without change.

This alternative would also avoid temporary aesthetic degradation associated with construction activities, such as exposed soils, staging areas, construction equipment, and nighttime lighting. In contrast to the proposed project, which would introduce new visual features and potentially alter visual character (even if less than significant with mitigation), the No Project Alternative would avoid all such changes. The No Project Alternative would not include Mitigation Measures AES-1 and AES-2, however, because there would be no changes to the proposed site. Accordingly, the No Project Alternative would have less potential to result in adverse aesthetic impacts compared to the proposed project. There would be no impact and impacts overall would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would result in reduced impacts to aesthetics by preserving the existing visual character of the site and avoiding new sources of visual change. Overall, the No Project Alternative would result in less than significant aesthetic impacts, whereas the proposed project would result in significant and unavoidable impacts, as shown in Table 6-22.

b. Air Quality

The No Project Alternative would maintain existing air quality conditions by continuing ongoing site operations without demolition, grading, or new construction. This alternative would not generate short-term construction-related emissions from demolition, grading, and building activities, or long-term operational emissions associated with the proposed project's new office space, the ECC, residential units, and retail/commercial uses. Under the No Project Alternative, the proposed project would not be implemented, and the project site would remain in its existing condition, with multiple low-rise government office buildings, internal roadways, parking areas, and associated landscaping.

Although this alternative would not incorporate Mitigation Measures AQ-1 and AQ-2, updated energy-efficient design, or emissions-reducing features associated with the proposed project, it would also avoid construction-related emissions and increases in long-term operational emissions. Because development would not occur, there would be no additional criteria pollutant or greenhouse gas emissions beyond existing baseline conditions. Accordingly, the No Project Alternative would have less potential to result in significant air quality impacts compared to the proposed project. There would be no impact and impacts would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would result in reduced impacts to air quality by avoiding construction and operational emissions associated with new development. Overall, the No Project Alternative would not result in impacts to air quality, whereas the proposed project would result in less than significant impacts with mitigation, as shown in Table 6-2.

c. Biological Resources

As described in Section 4.3, *Biological Resources*, biological resources on the site are limited due to existing development but include ornamental landscaping and trees. Under the No Project Alternative, the proposed project would not be implemented, and the site would remain in its existing developed condition. Because development would not occur and use of the site would remain as it is under existing conditions, there would be no potential to impact special-status species, remove trees, or disturb nesting birds. Accordingly, the No Project Alternative would have less potential to result in adverse impacts to biological resources compared to the proposed project. Impacts to special-status species, habitat, and nesting birds would be less than significant and reduced compared to the proposed project, and Mitigation Measure BIO-1 would not be required. Routine maintenance activities that could affect landscaping would not result in significant impacts. Overall, impacts to biological resources would be reduced under this alternative and would result in no impacts to biological resources.

Summary

Compared to the proposed project, the No Project Alternative would result in reduced impacts to biological resources by avoiding ground disturbance and vegetation removal that could affect special-status species, habitat, and nesting birds. Overall, the No Project Alternative would result in no impact to biological resources, whereas the proposed project would result in less than significant impacts with mitigation, as shown in Table 6-2.

d. Cultural Resources

As described in Section 4.4, *Cultural Resources*, the existing Administration Building is of historical age and has been determined to be eligible for listing in the California Register of Historical Resources (CRHR) as a local historic resource. The No Project Alternative would retain existing buildings and site features, including those eligible for listing in the CRHR. This alternative would not include demolition or alteration of historical structures, nor would it involve ground disturbance that could affect archaeological resources.

Because development would not occur and use of the site would remain as it is under existing conditions, there would be no potential to adversely affect historic or archaeological resources. Accordingly, the No Project Alternative would have substantially less potential to result in significant impacts to cultural resources compared to the proposed project. As such, mitigation measures CUL-1a, CUL-1b, CUL-2a, and CUL-2b would not be required. Therefore, impacts to cultural resources under the No Project Alternative would be reduced compared to the proposed project and would not result in impacts to cultural resources.

Summary

Compared to the proposed project, the No Project Alternative would avoid impacts to cultural resources by eliminating demolition, alteration, and ground disturbance that would affect historic resources and could impact archaeological resources. Overall, the No Project Alternative would result in no impact to cultural resources, whereas the proposed project would result in significant and unavoidable impacts even with mitigation incorporated, as shown in Table 6-2.

e. Energy

The No Project Alternative would maintain existing levels of energy use associated with current County operations. This alternative would not include new construction or expanded uses that would increase energy demand. Ongoing energy use would be limited to existing levels associated with current building operations, maintenance activities, and site use, without the addition of new energy demand from expanded development.

Although this alternative would not incorporate energy-efficient design or infrastructure improvements that would reduce long-term consumption, it would also avoid construction-related energy use and increased operational demand associated with expanded development. Accordingly, the No Project Alternative would have less potential to result in increased or inefficient energy consumption compared to the proposed project and use of the site would remain as it is under existing conditions. There would be no impact and impacts would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would result in reduced energy demand by avoiding construction and additional operational uses associated with new development. Overall, the No Project Alternative would result in no impacts related to energy use, whereas the proposed project would result in less than significant impacts, as shown in Table 6-2.

f. Geology and Soils

Under the No Project Alternative, the proposed project would not be implemented, and the project site would remain in its existing developed condition. Buildings proposed for demolition would remain in use, and no new office building, the ECC, residential units, or retail/commercial uses would be constructed. Because no new development would occur, there would be no increased exposure to seismic hazards, liquefaction, or soil instability beyond existing conditions and Mitigation Measure GEO-1 would not be required. Accordingly, the No Project Alternative would have less potential to result in significant geology and soils impacts compared to the proposed project and use of the site would remain as it is under existing conditions. There would be no impact and impacts would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would avoid impacts related to geology and soils by eliminating ground disturbance and new development that could expose people and structures to seismic hazards and soil instability. Overall, the No Project Alternative would result in no impact related to geology and soils, whereas the proposed project would result in less than significant impacts with mitigation, as shown in Table 6-2.

g. Greenhouse Gas Emissions

Under the No Project Alternative, the proposed project would not be implemented, and the site would maintain existing greenhouse gas emissions associated with ongoing site operations. This alternative would not include construction or expanded uses that would increase emissions. As a result, no construction-related emissions or increases in operational GHG emissions would occur beyond existing conditions. Although the No Project Alternative would not include Mitigation Measure GHG-1 or potentially achieve potential long-term efficiency gains associated with newer

buildings, it would avoid both short-term construction emissions and increases in operational emissions. Accordingly, the No Project Alternative would have less potential to result in significant greenhouse gas impacts compared to the proposed project. There would be no impact, and impacts overall would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would result in reduced greenhouse gas emissions by avoiding construction and operational emissions associated with new development. Overall, the No Project Alternative would not result in impacts to greenhouse gas emissions, whereas the proposed project would also result in less than significant impacts with mitigation, as shown in Table 6-2.

h. Hazards and Hazardous Materials

Under the No Project Alternative, the proposed project would not be implemented, and the site would remain in its existing developed condition. Buildings proposed for demolition would remain in use, and no new office building, ECC, residential units, or retail/commercial uses would be constructed. As a result, no demolition, ground disturbance, or construction-related transport or use of hazardous materials would occur and use of the site would remain as it is under existing conditions. Accordingly, Mitigation Measure HAZ-1 would not be required. Therefore, hazards and hazardous materials impacts under the No Project Alternative would be reduced compared to the proposed project and this alternative would result in no impact to hazards and hazardous materials.

Summary

Compared to the proposed project, the No Project Alternative would avoid impacts related to hazards and hazardous materials by eliminating demolition, ground disturbance, and the transport or use of hazardous materials associated with new development. Overall, the No Project Alternative would result in no impact related to hazards and hazardous materials, whereas the proposed project would result in less than significant impacts with mitigation, as shown in Table 6-2.

i. Hydrology and Water Quality

Under the No Project Alternative, the proposed project would not be implemented, and the site would remain in its existing developed condition. Under the No Project Alternative, the project site would maintain existing drainage patterns, impervious surfaces, and stormwater infrastructure. This alternative would not include grading or construction activities that could increase runoff, erosion, or pollutant discharge. Because development would not occur and use of the site would remain as it is under existing conditions, there would be no changes to hydrologic conditions. Accordingly, the No Project Alternative would have less potential to result in significant hydrology and water quality impacts compared to the proposed project. There would be no impact and overall impacts would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would reduce the potential for hydrology and water quality impacts by avoiding grading, construction, and associated increases in runoff and pollutant discharge. Overall, the No Project Alternative would result in no impacts to hydrology and water quality, whereas the proposed project would result in less than significant impacts, as shown in Table 6-2.

j. Land Use and Planning

Under the No Project Alternative, the site would continue the existing institutional land use pattern on the site and would not introduce new land uses or increase development intensity. As a result, no changes to existing land uses or land use patterns would occur.

Because no changes to zoning or land use designations would occur and use of the site would remain as it is under existing conditions, this alternative would not result in land use conflicts or inconsistencies with applicable plans. Accordingly, the No Project Alternative would have less potential to result in land use impacts compared to the proposed project. There would be no impact, and impacts overall would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would reduce the potential for land use impacts by maintaining existing land use patterns and avoiding new development. Overall, the No Project Alternative would result in no impact related to land use and planning, whereas the proposed project would result in less than significant impacts, as shown in Table 6-2.

k. Noise

As described in Section 4.11, *Noise*, implementation of the proposed project would involve demolition, grading, and construction activities that would generate temporary increases in noise and vibration levels, as well as long-term operational noise associated with additional building uses, increased vehicle miles traveled (VMT), and mechanical equipment. Under the No Project Alternative, the proposed project would not be implemented, and the site would remain in its existing developed condition. Under the No Project Alternative, the project site would maintain existing ambient noise conditions associated with current government operations. This alternative would not include construction activities or new operational noise sources and Mitigation Measures NOI-1 and NOI-2 would not be required. As a result, use of the site would remain as it is under existing conditions and no construction-related noise or increases in operational noise would occur beyond existing conditions. Accordingly, the No Project Alternative would have less potential to result in significant noise impacts compared to the proposed project. There would be no impact and impacts would overall be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would reduce noise impacts by avoiding construction activities and new operational noise sources. Overall, the No Project Alternative would result in no impacts to noise, whereas the proposed project would result in less than significant impacts with mitigation, as shown in Table 6-2.

l. Public Services and Recreation

Under the No Project Alternative, the proposed project would not be implemented, and the site would remain in its existing developed condition. The No Project Alternatives would maintain current demand levels for public services and recreational facilities. The No Project Alternative would not introduce new population or employment growth that would increase service demand. Because use of the site would remain as it is under existing conditions and demand would not increase, there would be no need for expanded facilities or services. Accordingly, the No Project Alternative would have less potential to result in impacts to public services and recreation

compared to the proposed project. There would be no impact and impacts would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would reduce the potential for impacts to public services and recreation by avoiding increases in population and demand for services. Overall, the No Project Alternative would result in no impacts to public services and recreation, whereas the proposed project would result in less than significant impacts, as shown in Table 6-2.

m. Transportation

Under the No Project Alternative, the proposed project would not be implemented, and the site would remain in its existing developed condition. Accordingly, the No Project Alternative would maintain existing traffic volumes, circulation patterns, and vehicle miles traveled. The No Project Alternative would not generate new trips or alter transportation conditions

Because development would not occur and use of the site would remain as it is under existing conditions, there would be no increase in VMT or changes to transportation systems. Accordingly, the No Project Alternative would have less potential to result in significant transportation impacts compared to the proposed project. Impacts would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would reduce transportation impacts by avoiding new vehicle trips and increases in VMT. Overall, the No Project Alternative would result in no impacts to transportation, whereas the proposed project would result in less than significant impacts, as shown in Table 6-2.

n. Tribal Cultural Resources

As described in Section 4.14, *Tribal Cultural Resources*, implementation of the proposed project would involve demolition, grading, and construction activities that could result in impacts to tribal cultural resources, including the potential disturbance of previously unidentified resources during ground-disturbing activities. Under the No Project Alternative, the proposed project would not be implemented, and the site would remain in its existing developed condition. Because the No Project Alternative would not include ground-disturbing activities that could affect tribal cultural resources, mitigation measures TCR-1 and TCR-2 would not be required.

Because no excavation or construction would occur and use of the site would remain as it is under existing conditions, there would be no potential to disturb known or unknown tribal cultural resources. Accordingly, the No Project Alternative would have less potential to result in significant impacts compared to the proposed project. There would be no impact to Tribal Cultural Resources overall and impacts would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would avoid impacts to tribal cultural resources by eliminating ground-disturbing activities that could affect unknown resources. Overall,

the No Project Alternative would result in no impact to tribal cultural resources, whereas the proposed project would result in less than significant impacts with mitigation, as shown in Table 6-2.

o. Utilities and Service Systems

Under the No Project Alternative, the proposed project would not be implemented, and the site would remain in its existing developed condition. Buildings proposed for demolition would remain in use, and no new office building, ECC, residential units, or retail/commercial uses would be constructed. As a result, no increase in demand for utilities or expansion of service systems would occur beyond existing conditions.

Because no new development would occur and use of the site would remain as it is under existing conditions, there would be no increased demand for water, wastewater, or solid waste services. Accordingly, the No Project Alternative would have no impacts to utilities and impacts would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would reduce the potential for utility and service system impacts by avoiding increases in demand for water, wastewater, and solid waste services. Overall, the No Project Alternative would result in no impacts to utilities and service systems, whereas the proposed project would result in less than significant impacts, as shown in Table 6-2.

p. Wildfire

As described in Section 4.16, *Wildfire*, implementation of the proposed project would involve demolition, grading, and construction activities that would temporarily increase wildfire risk through the use of equipment and potential ignition sources, as well as introduce new structures and occupants that would be exposed to wildfire hazards. Under the No Project Alternative, the proposed project would not be implemented and therefore would maintain existing wildfire risk conditions and would not introduce construction-related ignition sources or additional population exposure.

Because development would not occur and use of the site would remain as they are under existing conditions, there would be no increase in wildfire risk beyond existing conditions. Accordingly, the No Project Alternative would have no impacts to wildfire and impacts would be reduced compared to the proposed project.

Summary

Compared to the proposed project, the No Project Alternative would reduce wildfire risk by avoiding construction activities and additional population exposure. Overall, the No Project Alternative would result no impact to wildfire, whereas the proposed project would result in less than significant impacts, as shown in Table 6-2.

6.3 Alternative 2: 200-Unit Alternative

6.3.1 Description

The 200-Unit Alternative would result in a reduced residential component on the project site, consisting of approximately 200 housing units and excluding the proposed retail/commercial component. Under this alternative, development would include construction of a new approximately 250,000-square-foot office building with a maximum height of five stories and a 7,000-13,000-square-foot ECC, consistent with the proposed project. Similar to the proposed project, this alternative would include residential development within the existing CAC, but with 1,300 fewer residential units. Under this alternative, no new retail/commercial space would be constructed, and the scale of development would be reduced compared to the proposed project. Furthermore, residential building heights under the 200-Unit Alternative would be limited to a maximum of four stories, which would contribute to a reduction in project scale, intensity, and associated environmental effects relative to the proposed project. This alternative would still include redevelopment of portions of the site to accommodate housing, but would result in less overall building massing and activity.

The 200-Unit Alternative would meet a majority of the Project Objectives by providing housing opportunities on the CAC site, but to a lesser extent than the proposed project. The reduced number of units would limit the extent to which the alternative could fully achieve housing production objectives, particularly those related to maximizing affordable housing and housing for County employees. This alternative would also not include the proposed retail/commercial uses and therefore would not provide on-site amenities or services associated with mixed-use development.

6.3.2 Impact Analysis

a. Aesthetics

The 200-Unit Alternative would involve redevelopment within the existing CAC site but at a reduced scale compared to the proposed project, with lower residential building heights (maximum four stories) and no retail/commercial component. By limiting building massing and overall development intensity, the 200-Unit Alternative would reduce the potential for visual changes related to residential building height, bulk, and overall development intensity compared to the proposed project. The absence of retail/commercial uses would also reduce lighting, signage, and activity levels that could contribute to changes in visual character as compared to the proposed project. However, the 200-Unit Alternative would still introduce a new office building (maximum five stories) and new residential development that would alter the existing visual character of the site, particularly where existing buildings are replaced with multi-story residential structures. Similar to the proposed project, new development could affect public views and introduce new sources of light and glare, although to a lesser degree due to reduced scale.

As with the proposed project, impacts related to visual character and light and glare would be addressed through implementation of Mitigation Measures AES-1 and AES-2. With mitigation incorporated, impacts to aesthetics would be reduced but would remain significant and unavoidable as details regarding residential development massing and height are still unknown. Overall, aesthetic impacts under this alternative would be reduced compared to the proposed project but would be significant and unavoidable.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce aesthetic impacts by limiting residential building height, bulk, and lighting associated with new development. However, these impacts would still be significant and unavoidable, similar to the proposed project, as shown in Table 6-2.

b. Air Quality

The 200-Unit Alternative would result in less construction activity and reduced operational emissions compared to the proposed project due to the smaller scale of development and absence of retail/commercial uses. Construction emissions would still occur but would be lower in magnitude because fewer units would be developed and less grading and building activity would occur. Operational emissions associated with vehicle trips, energy use, and area sources would also be reduced compared to the proposed project because the alternative would generate fewer trips and lower overall energy demand. However, similar to the proposed project, emissions could exceed applicable thresholds without mitigation.

Implementation of Mitigation Measures AQ-1 and AQ-2 would reduce operational and construction-related emissions. Accordingly, impacts to air quality would be reduced compared to the proposed project. With mitigation incorporated, air quality impacts would be less than significant, similar to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce air quality impacts by lowering construction and operational emissions associated with a smaller-scale development. Overall, the 200-Unit Alternative would result in less than significant air quality impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

c. Biological Recourses

As described in Section 4.3, *Biological Resources*, biological resources on the site are limited due to existing development but include ornamental landscaping, trees, and potentially suitable habitat for common wildlife species, including nesting birds protected under the Migratory Bird Treaty Act. The 200-Unit Alternative would concentrate development within an already disturbed and developed portion of the CAC site, similar to the proposed project, but with a smaller development footprint. As a result, the extent of vegetation removal and site disturbance would be reduced compared to the proposed project.

Construction activities could still result in impacts to nesting birds during vegetation removal or site preparation. However, because the scale of disturbance would be reduced, the likelihood and extent of such impacts would also be lower. Implementation of Mitigation Measure BIO-1 would ensure that impacts to nesting birds are avoided or minimized. Accordingly, impacts to biological resources would be slightly reduced compared to the proposed project, and would be less than significant with mitigation incorporated, similar to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce impacts to biological resources by limiting vegetation removal and ground disturbance associated with a smaller development footprint. Overall, the 200-Unit Alternative would result in less than significant

impacts to biological resources with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

d. Cultural Resources

The 200-Unit Alternative would involve redevelopment of portions of the CAC site and would still require demolition of existing structures. Because demolition of the historically-eligible Administration Building would occur, impacts to historical resources would be similar to the proposed project. Although the extent of redevelopment may be reduced, any loss of a significant historical resource would constitute a significant and unavoidable impact under CEQA.

Implementation of Mitigation Measures CUL-1a and CUL-1b would provide documentation and interpretive measures but would not fully mitigate the loss of a historical resource. Additionally, ground-disturbing activities associated with construction could encounter previously undiscovered archaeological resources. Implementation of Mitigation Measures CUL-2a and CUL-2b would reduce impacts related to unknown resources to less than significant levels. Overall, impacts to cultural resources would be similar to the proposed project if demolition occurs, though potentially reduced in extent depending on project design.

Summary

Compared to the proposed project, the 200-Unit Alternative would not substantially reduce impacts to cultural resources because demolition of a historically eligible structure would still occur. Overall, the 200-Unit Alternative would result in significant and unavoidable impacts to a historical resource and less than significant impacts to archaeological resources with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

e. Energy

The 200-Unit Alternative would reduce overall construction and operational energy demand compared to the proposed project due to fewer residential units and the absence of retail/commercial uses. Similar to the proposed project, this alternative would result in construction-related energy use; however, the intensity and duration of construction activities would be reduced. The absence of retail/commercial uses and the smaller residential component would also reduce long-term operational energy demand associated with building operations and site activities.

Similar to the proposed project, this alternative would incorporate energy-efficient design features consistent with Title 24 and CALGreen requirements. Because development would still occur, energy consumption would increase relative to existing conditions, but not to the same extent as the proposed project. As with the proposed project, compliance with applicable regulations would ensure that energy use is efficient and not wasteful. As such, total energy consumption would be lower compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce energy demand by decreasing construction and operational energy use associated with a smaller-scale development. Overall, the 200-Unit Alternative would result in less than significant impacts related to energy use, similar to the proposed project, as shown in Table 6-2.

f. Geology and Soils

The 200-Unit Alternative would involve construction activities that could expose people and structures to seismic hazards, liquefaction, and soil instability, similar to the proposed project. However, the reduced scale of development would limit the extent of excavation, grading, and soil disturbance. This would reduce the overall area subject to potential erosion or geotechnical hazards compared to the proposed project. Ground-disturbing activities could also encounter previously unidentified paleontological resources; however, the reduced extent of grading would decrease the likelihood and extent of disturbance compared to the proposed project.

Implementation of Mitigation Measure GEO-1 would require site-specific geotechnical investigations and incorporation of design recommendations into construction plans. Compliance with building codes would further ensure structural safety. While the nature of impacts would be similar, including exposure to seismic risks, the reduced project footprint would lessen the severity due to fewer residential units and reduced building height. Accordingly, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce impacts related to geology, soils, and paleontological resources by limiting the extent of ground disturbance and development. Overall, the 200-Unit Alternative would result in less than significant impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

g. Greenhouse Gas Emissions

The 200-Unit Alternative would generate greenhouse gas emissions during construction and operation, but at lower levels than the proposed project due to reduced development intensity. The absence of retail/commercial uses and fewer residential units would result in lower operational emissions from transportation and energy consumption.

Similar to the proposed project, this alternative would incorporate energy-efficient building design, EV infrastructure, and renewable energy features. Implementation of Mitigation Measure GHG-1 would further reduce emissions and ensure consistency with applicable climate goals. While the types of GHG impacts would be similar, the overall emissions profile would be reduced. As a result of the reduced residential site development, impacts under this alternative would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce greenhouse gas emissions by lowering construction and operational emissions associated with a smaller-scale development. Overall, the 200-Unit Alternative would result in less than significant greenhouse gas impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

h. Hazards and Hazardous Materials

The 200-Unit Alternative would involve demolition and construction activities that could expose workers and nearby receptors to hazardous materials. However, the reduced extent of redevelopment would lessen the overall potential for exposure relative to the proposed project. In addition, implementation of Mitigation Measure HAZ-1 would ensure proper identification, removal, and disposal of hazardous materials. Operational use of hazardous materials would also be

reduced due to the absence of retail/commercial uses. While impacts would be similar in type, including exposure risks during demolition, they would occur at a reduced scale. Accordingly, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce impacts related to hazards and hazardous materials by limiting demolition and construction activities and eliminating retail/commercial uses, and the exposure risks associated with those activities and uses. Overall, the 200-Unit Alternative would result in less than significant impacts to hazards and hazardous materials with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

i. Hydrology and Water Quality

The 200-Unit Alternative would introduce new impervious surfaces and increase stormwater runoff, although to a lesser extent than the proposed project. The reduced development footprint would result in less alteration of drainage patterns and lower potential for erosion or sedimentation.

Similar to the proposed project, compliance with stormwater regulations, SWPPP requirements, and LID standards would minimize impacts. These measures would ensure that runoff is treated and managed appropriately. While impacts such as pollutant discharge and runoff would still occur, they would be reduced in magnitude. Accordingly, impacts would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce hydrology and water quality impacts by limiting increases in impervious surfaces, stormwater runoff, and potential pollutant discharge. Overall, the 200-Unit Alternative would result in less than significant impacts to hydrology and water quality, similar to the proposed project, as shown in Table 6-2.

j. Land Use and Planning

The 200-Unit Alternative would introduce residential uses supportive of the General Plan and Housing Element policies, although at a reduced level compared to the proposed project. The absence of retail/commercial uses would limit the extent of mixed-use development envisioned for the site.

While this alternative would meet most of the projects objectives, including most of the objectives related to housing, it would not maximize housing supply or create an integrated mixed-use environment. However, it would not result in inconsistencies with applicable land use plans or policies, nor would it divide an established community. The types of land use impacts would be similar to the proposed project. Impacts would be less than significant and similar to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce land use impacts by limiting the extent of development and eliminating mixed-use components, while remaining consistent with applicable plans and policies. Overall, the 200-Unit Alternative would result in less

than significant impacts related to land use and planning, similar to the proposed project, as shown in Table 6-2.

k. Noise

The 200-Unit Alternative would generate temporary construction noise and long-term operational noise, similar to the proposed project. However, the reduced scale of development would result in lower overall noise levels and shorter construction duration.

Implementation of mitigation measures NOI-1 and NOI-2 would reduce noise to acceptable levels and ensure compliance with County standards. Although noise sources such as construction equipment and traffic would still occur, their intensity would be reduced. Impacts would remain similar in type but lower in magnitude. Accordingly, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce noise impacts by limiting construction duration and overall noise levels associated with a smaller-scale development. Overall, the 200-Unit Alternative would result in less than significant noise impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

l. Public Services and Recreation

The 200-Unit Alternative would increase demand for public services, including fire protection, police services, schools, and parks, due to the introduction of new residential units on the project site. However, because this alternative includes fewer units than the proposed project and does not include retail/commercial uses, the overall increase in population and service demand would be lower. Fire and police protection services would continue to be provided by existing facilities serving the area, and the reduced scale of development would lessen the incremental demand placed on these services. Similarly, the number of school-aged children generated by the 200-Unit Alternative would be lower, reducing potential impacts to school district capacity compared to the proposed project.

This alternative would also generate demand for parks and recreational facilities, although at a reduced level compared to the proposed project. Existing and planned recreational facilities within the surrounding area would continue to serve the project site, and the smaller population increase would limit the intensity of use and demand on parks and recreational facilities.

While the types of impacts would be similar, including increased use of public services and recreational resources, the magnitude of these impacts would be reduced. Accordingly, impacts to public services and recreation would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce impacts to public services and recreation by limiting population growth and associated demand for services and facilities. Overall, the 200-Unit Alternative would result in less than significant impacts to public services and recreation, similar to the proposed project, as shown in Table 6-2.

m. Transportation

The 200-Unit Alternative would result in additional vehicle trips, increased VMT, and changes to local circulation patterns associated with new residential uses compared to existing conditions. However, the overall number of trips generated would be substantially lower than under the proposed project due to the reduced number of housing units and the absence of retail/commercial uses that typically generate additional daily and peak-hour trips.

Under the 200-Unit Alternative, impacts to roadways, transit, and bicycle and pedestrian would still occur, just at a proportionally smaller and more limited extent. Similar to the proposed project, residents would have access to existing transit, bicycle, and pedestrian infrastructure, which could help reduce reliance on vehicle travel. Because the alternative would still introduce new travel demand, the types of impacts would be similar, but their scale would be reduced. Accordingly, transportation impacts would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce transportation impacts by lowering vehicle trips and VMT associated with a smaller-scale development. Overall, the 200-Unit Alternative would result in less than significant transportation impacts, similar to the proposed project, as shown in Table 6-2.

n. Tribal Cultural Resources

The 200-Unit Alternative would involve ground-disturbing activities such as grading and excavation, which could result in inadvertent discovery or disturbance of tribal cultural resources. However, because the overall development footprint would be smaller than the proposed project, the extent of ground disturbance would be reduced, thereby lowering the likelihood and potential severity of impacts. The site is already developed and has been subject to prior disturbance, which further limits the potential for intact resources, although the possibility cannot be entirely eliminated.

As with the proposed project, implementation of Mitigation Measures TCR-1 and TCR-2 would ensure that any inadvertent discoveries are addressed in coordination with tribal representatives, with avoidance and preservation as the preferred treatment methods. This measure would reduce impacts to less than significant levels. While the nature of impacts would be similar to the proposed project, including the potential for disturbance of unknown resources, the reduced extent of construction would limit overall risk. Therefore, impacts to tribal cultural resources would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce impacts to tribal cultural resources by limiting the extent of ground disturbance and potential for inadvertent discovery of resources. Overall, the 200-Unit Alternative would result in less than significant impacts to tribal cultural resources with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

o. Utilities and Service Systems

The 200-Unit Alternative would increase demand for utilities and service systems, including water supply, wastewater treatment, stormwater infrastructure, solid waste services, and energy distribution. However, due to the reduced number of residential units and the absence of retail/commercial uses, overall demand would be lower than under the proposed project. The project site is located within an urbanized area that is already served by existing utility infrastructure and is suitable for infill development.

Although system demand would increase relative to existing conditions, the incremental increase would be modest compared to the proposed project and would be within the capacity of existing or planned infrastructure improvements. Compliance with applicable regulations, including water conservation requirements, stormwater management standards, and solid waste diversion mandates, would ensure efficient resource use and minimize environmental effects. Similar to the proposed project, utility providers would be able to serve the development without requiring substantial new facilities that could result in environmental impacts. While the types of impacts would be similar, including increased demand and associated service provision, the scale would be reduced. Accordingly, impacts to utilities and service systems would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce impacts to utilities and service systems by lowering overall demand for water, wastewater, stormwater, solid waste, and energy services associated with a smaller-scale development. Overall, the 200-Unit Alternative would result in less than significant impacts to utilities and service systems, similar to the proposed project, as shown in Table 6-2.

p. Wildfire

The 200-Unit Alternative would introduce new residential development that could be exposed to wildfire hazards, as well as involve construction activities that may temporarily increase the risk of ignition from equipment and human activity. However, the number of residents and structures exposed to wildfire risk would be lower than under the proposed project due to the reduced scale of development. This would reduce the overall level of risk and potential emergency response demand in the event of a wildfire.

Construction-related wildfire risks, such as those associated with heavy equipment or temporary ignition sources, would still occur but would be more limited in duration and extent. Operational wildfire risk would be addressed through compliance with applicable building and fire codes, including requirements for defensible space, fire-resistant materials, and emergency access. These measures would reduce wildfire risk to an acceptable level consistent with regulatory standards. While the types of wildfire-related impacts would be similar to the proposed project, the reduced number of units and elimination of the retail/commercial space would limit exposure and potential consequences. Additionally, the reduced site intensity may provide marginal improvements in emergency access and evacuation efficiency compared to more intensive development scenarios. Accordingly, wildfire impacts would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 200-Unit Alternative would reduce wildfire impacts by limiting the number of residents and structures exposed to wildfire risk and reducing construction-related ignition sources. Overall, the 200-Unit Alternative would result in less than significant wildfire impacts, similar to the proposed project, as shown in Table 6-2.

6.4 Alternative 3: 650-Unit Alternative

6.4.1 Description

The 650-Unit Alternative would result in a reduced residential component on the project site, consisting of approximately 650 housing units and excluding the proposed retail/commercial component. Under this alternative, development would include construction of a new approximately 250,000-square-foot office building with a maximum height of five stories and a 7,000-13,000-square-foot ECC, consistent with the proposed project. Similar to the proposed project, this alternative would include residential development within the existing CAC, but with 850 fewer residential units. Under this alternative, no new retail/commercial space would be constructed, and the scale of development would be reduced compared to the proposed project. Furthermore, residential building heights under the 650-Unit Alternative would be limited to a maximum of four stories, which would contribute to a reduction in project scale, intensity, and associated environmental effects relative to the proposed project. This alternative would still include redevelopment of portions of the site to accommodate housing, but would result in less overall building massing and activity.

The 650-Unit Alternative would meet most of the Project Objectives by continuing to provide housing opportunities on the CAC site and supporting implementation of the County's Housing Element and RHNA obligations. Due to the reduced unit count compared to the proposed project, the alternative would not maximize housing production, including affordable housing and housing for County employees. Additionally, the absence of retail/commercial uses would eliminate opportunities for on-site amenities and services associated with a mixed-use development program.

6.4.2 Impact Analysis

a. Aesthetics

The 650-Unit Alternative would involve redevelopment within the existing CAC site but at a reduced scale compared to the proposed project, with lower residential building heights (maximum four stories) and no retail/commercial component. By limiting building massing and overall development intensity, the 650-Unit Alternative would reduce the potential for visual changes related to residential building height, bulk, and overall development intensity compared to the proposed project. The absence of retail/commercial uses would also reduce lighting, signage, and activity levels that could contribute to changes in visual character, as compared to the proposed project. However, the 650-Unit Alternative would still introduce a new office building (maximum five stories) and new residential development that would alter the existing visual character of the site, particularly where existing buildings are replaced with multi-story residential structures. Similar to the proposed project, new development could affect public views and introduce new sources of light and glare, although to a lesser degree due to reduced scale.

As with the proposed project, impacts related to visual character and light and glare would be addressed through implementation of Mitigation Measures AES-1 and AES-2. With mitigation incorporated, impacts to aesthetics would be reduced but would remain significant and unavoidable as details regarding residential development massing and height are still unknown. Overall, aesthetic impacts under this alternative would be reduced compared to the proposed project but would be significant and unavoidable.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce aesthetic impacts by limiting residential building height, bulk, and lighting associated with new development. However, these impacts would still be significant and unavoidable, similar to the proposed project, as shown in Table 6-2.

b. Air Quality

The 650-Unit Alternative would result in less construction activity and reduced operational emissions compared to the proposed project due to the smaller scale of development and absence of retail/commercial uses. Construction emissions would still occur but would be lower in magnitude because fewer units would be developed and less grading and building activity would occur. Operational emissions associated with vehicle trips, energy use, and area sources would also be reduced compared to the proposed project because the alternative would generate fewer trips and lower overall energy demand. However, similar to the proposed project, emissions could exceed applicable thresholds without mitigation.

Implementation of Mitigation Measures AQ-1 and AQ-2 would reduce operational and construction-related emissions. Accordingly, impacts to air quality would be reduced compared to the proposed project. With mitigation incorporated, air quality impacts would be less than significant, similar to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce air quality impacts by lowering construction and operational emissions associated with a smaller-scale development. Overall, the 650-Unit Alternative would result in less than significant air quality impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

c. Biological Resources

The 650-Unit Alternative would concentrate development within an already disturbed and developed portion of the CAC site, similar to the proposed project, but with a smaller development footprint. As a result, the extent of vegetation removal and site disturbance would be reduced compared to the proposed project.

Construction activities could still result in impacts to nesting birds during vegetation removal or site preparation. However, because the scale of disturbance would be reduced, the likelihood and extent of such impacts would also be lower. Implementation of Mitigation Measure BIO-1 would ensure that impacts to nesting birds are avoided or minimized. Accordingly, impacts to biological resources would be slightly reduced compared to the proposed project, and would be less than significant with mitigation incorporated, similar to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce impacts to biological resources by limiting vegetation removal and ground disturbance associated with a smaller development footprint. Overall, the 650-Unit Alternative would result in less than significant impacts to biological resources with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

d. Cultural Resources

The 650-Unit Alternative would involve redevelopment of portions of the CAC site and still require demolition of existing structures. Because demolition of the historically-eligible Administration Building would occur, impacts to historical resources would be similar to the proposed project. Although the extent of redevelopment may be reduced, any loss of a significant historical resource would constitute a significant and unavoidable impact under CEQA.

Implementation of Mitigation Measures CUL-1a and CUL-1b would provide documentation and interpretive measures but would not fully mitigate the loss of a historical resource. Additionally, ground-disturbing activities associated with construction could encounter previously undiscovered archaeological resources. Implementation of Mitigation Measures CUL-2a and CUL-2b would reduce impacts related to unknown resources to less than significant levels. Overall, impacts to cultural resources would be similar to the proposed project if demolition occurs, though potentially reduced in extent depending on project design.

Summary

Compared to the proposed project, the 650-Unit Alternative would not substantially reduce impacts to cultural resources because demolition of a historically eligible structure would still occur. Overall, the 650-Unit Alternative would result in significant and unavoidable impacts to historical resources and less than significant impacts to archaeological resources with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

e. Energy

The 650-Unit Alternative would reduce overall construction and operational energy demand compared to the proposed project due to fewer residential units and the absence of retail/commercial uses. Similar to the proposed project, this alternative would result in construction-related energy use; however, the intensity and duration of construction activities would be reduced. The absence of retail/commercial uses and the smaller residential component would also reduce long-term operational energy demand associated with building operations and site activities.

Similar to the proposed project, this alternative would incorporate energy-efficient design features consistent with Title 24 and CALGreen requirements. Because development would still occur, energy consumption would increase relative to existing conditions, but not to the same extent as the proposed project. As with the proposed project, compliance with applicable regulations would ensure that energy use is efficient and not wasteful. As such, total energy consumption would be lower compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce energy demand by decreasing construction and operational energy use associated with a smaller-scale development. Overall, the 650-Unit Alternative would result in less than significant impacts related to energy use, similar to the proposed project, as shown in Table 6-2.

f. Geology and Soils

The 650-Unit Alternative would involve construction activities that could expose people and structures to seismic hazards, liquefaction, and soil instability, similar to the proposed project. However, the reduced scale of development would limit the extent of excavation, grading, and soil disturbance. This would reduce the overall area subject to potential erosion or geotechnical hazards compared to the proposed project. Ground-disturbing activities could also encounter previously unidentified paleontological resources; however, the reduced extent of grading would decrease the likelihood and extent of disturbance compared to the proposed project.

Implementation of Mitigation Measure GEO-1 would require site-specific geotechnical investigations and incorporation of design recommendations into construction plans. Compliance with building codes would further ensure structural safety. While the nature of impacts would be similar, including exposure to seismic risks, the reduced project footprint would lessen the severity due to fewer residential units and reduced building height. Accordingly, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce impacts related to geology, soils, and paleontological resources by limiting the extent of ground disturbance and development. Overall, the 650-Unit Alternative would result in less than significant impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

g. Greenhouse Gas Emissions

The 650-Unit Alternative would generate greenhouse gas emissions during construction and operation, but at lower levels than the proposed project due to reduced development intensity. The absence of retail/commercial uses and fewer residential units would also result in lower operational emissions from transportation and energy consumption.

Similar to the proposed project, this alternative would incorporate energy-efficient building design, EV infrastructure, and renewable energy features. Implementation of Mitigation Measure GHG-1 would further reduce emissions and ensure consistency with applicable climate goals. While the types of GHG impacts would be similar, the overall emissions profile would be reduced. Due to the reduced residential site development, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce greenhouse gas emissions by lowering construction and operational emissions associated with a smaller-scale development. Overall, the 650-Unit Alternative would result in less than significant greenhouse gas impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

h. Hazards and Hazardous Materials

The 650-Unit Alternative would involve demolition and construction activities that could expose workers and nearby receptors to hazardous materials. However, the reduced extent of redevelopment would lessen the overall potential for exposure relative to the proposed project. In addition, implementation of Mitigation Measure HAZ-1 would ensure proper identification, removal, and disposal of hazardous materials. Operational use of hazardous materials would also be reduced due to the absence of retail/commercial uses. While impacts would be similar in type, including exposure risks during demolition, they would occur at a reduced scale. Accordingly, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce impacts related to hazards and hazardous materials by limiting demolition and construction activities, eliminating retail/commercial uses, and the exposure risks associated with those activities and uses. Overall, the 650-Unit Alternative would result in less than significant impacts to hazards and hazardous materials with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

i. Hydrology and Water Quality

The 650-Unit Alternative would introduce new impervious surfaces and increase stormwater runoff, although to a lesser extent than the proposed project. The reduced development footprint would result in less alteration of drainage patterns and lower potential for erosion or sedimentation.

Similar to the proposed project, compliance with stormwater regulations, SWPPP requirements, and LID standards would minimize impacts. These measures would ensure that runoff is treated and managed appropriately. While impacts such as pollutant discharge and runoff would still occur, they would be reduced in magnitude. Accordingly, impacts would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce hydrology and water quality impacts by limiting increases in impervious surfaces, stormwater runoff, and potential pollutant discharge. Overall, the 650-Unit Alternative would result in less than significant impacts to hydrology and water quality, similar to the proposed project, as shown in Table 6-2.

j. Land Use and Planning

The 650-Unit Alternative would introduce residential uses supportive of the General Plan and Housing Element policies, although at a reduced level compared to the proposed project. The absence of retail/commercial uses would limit the extent of mixed-use development envisioned for the site.

While this alternative would meet most of the project objectives, including most of the objectives related to housing, it would not maximize housing supply or create an integrated mixed-use environment. However, it would not result in inconsistencies with applicable land use plans or policies, nor would it divide an established community. The types of land use impacts would be similar to the proposed project but less intensive. Impacts would be less than significant and similar to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce land use impacts by limiting the extent of development and eliminating mixed-use components, while remaining consistent with applicable plans and policies. Overall, the 650-Unit Alternative would result in less than significant impacts related to land use and planning, similar to the proposed project, as shown in Table 6-2.

k. Noise

The 650-Unit Alternative would generate temporary construction noise and long-term operational noise, similar to the proposed project. However, the reduced scale of development would result in lower overall noise levels and shorter construction duration.

Implementation of mitigation measures NOI-1 and NOI-2 would reduce noise to acceptable levels and ensure compliance with County standards. Although noise sources such as construction equipment and traffic would still occur, their intensity would be reduced. Impacts would remain similar in type but lower in magnitude. Accordingly, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce noise impacts by limiting construction duration and overall noise levels associated with a smaller-scale development. Overall, the 650-Unit Alternative would result in less than significant noise impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

l. Public Services and Recreation

The 650-Unit Alternative would increase demand for public services, including fire protection, police services, schools, and parks, due to the introduction of new residential units on the project site. However, because this alternative includes fewer units than the proposed project and does not include retail/commercial uses, the overall increase in population and service demand would be lower. Fire and police protection services would continue to be provided by existing facilities serving the area, and the reduced scale of development would lessen the incremental demand placed on these services. Similarly, the number of school-aged children generated by the 650-Unit Alternative would be lower, reducing potential impacts to school district capacity compared to the proposed project.

This alternative would also generate demand for parks and recreational facilities, although at a reduced level compared to the proposed project. Existing and planned recreational facilities within the surrounding area would continue to serve the project site, and the smaller population increase would limit the intensity of use and demand on parks and recreational facilities.

While the types of impacts would be similar, including increased use of public services and recreational resources, the magnitude of these impacts would be reduced. Accordingly, impacts to public services and recreation would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce impacts to public services and recreation by limiting population growth and associated demand for services and facilities. Overall, the 650-Unit Alternative would result in less than significant impacts to public services and recreation, similar to the proposed project, as shown in Table 6-2.

m. Transportation

The 650-Unit Alternative would result in additional vehicle trips, increased VMT, and changes to local circulation patterns associated with new residential uses compared to existing conditions. However, the overall number of trips generated would be substantially lower than under the proposed project due to the reduced number of housing units and the absence of retail/commercial uses that typically generate additional daily and peak-hour trips.

Under the 650-Unit Alternative, impacts to roadways, transit, and bicycle and pedestrian would still occur, just at a proportionally smaller and more limited extent. Similar to the proposed project, residents would have access to existing transit, bicycle, and pedestrian infrastructure, which could help reduce reliance on vehicle travel. Because the alternative would still introduce new travel demand, the types of impacts would be similar to the proposed project, but their scale would be reduced. Accordingly, transportation impacts would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce impacts to transportation by lowering vehicle trips and VMT associated with a smaller-scale development. Overall, the 650-Unit Alternative would result in less than significant impacts to transportation, similar to the proposed project, as shown in Table 6-2.

n. Tribal Cultural Resources

The 650-Unit Alternative would involve ground-disturbing activities such as grading and excavation, which could result in inadvertent discovery or disturbance of tribal cultural resources. However, because the overall development footprint would be smaller than the proposed project, the extent of ground disturbance would be reduced, thereby lowering the likelihood and potential severity of impacts. The site is already developed and has been subject to prior disturbance, which further limits the potential for intact resources, although the possibility cannot be entirely eliminated.

As with the proposed project, implementation of Mitigation Measures TCR-1 and TCR-2 would ensure that any inadvertent discoveries are addressed in coordination with tribal representatives, with avoidance and preservation as the preferred treatment methods. This measure would reduce impacts to less than significant levels. While the nature of impacts would be similar to the proposed project, including the potential for disturbance of unknown resources, the reduced extent of construction would limit overall risk. Therefore, impacts to tribal cultural resources would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce impacts to tribal cultural resources by limiting the extent of ground disturbance and potential for inadvertent discovery of resources. Overall, the 650-Unit Alternative would result in less than significant impacts to tribal

cultural resources with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

o. Utilities and Service Systems

The 650-Unit Alternative would increase demand for utilities and service systems, including water supply, wastewater treatment, stormwater infrastructure, solid waste services, and energy distribution. However, due to the reduced number of residential units and the absence of retail/commercial uses, overall demand would be lower than under the proposed project. The project site is located within an urbanized area that is already served by existing utility infrastructure and is suitable for infill development.

Although system demand would increase relative to existing conditions, the incremental increase would be modest compared to the proposed project and would be within the capacity of existing or planned infrastructure improvements. Compliance with applicable regulations, including water conservation requirements, stormwater management standards, and solid waste diversion mandates, would ensure efficient resource use and minimize environmental effects. Similar to the proposed project, utility providers would be able to serve the development without requiring substantial new facilities that could result in environmental impacts. While the types of impacts would be similar, including increased demand and associated service provision, the scale would be reduced. Accordingly, impacts to utilities and service systems would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce impacts to utilities and service systems by lowering overall demand for water, wastewater, stormwater, solid waste, and energy services associated with a smaller-scale development. Overall, the 650-Unit Alternative would result in less than significant impacts to utilities and service systems, similar to the proposed project, as shown in Table 6-2.

p. Wildfire

The 650-Unit Alternative would introduce new residential development that could be exposed to wildfire hazards, as well as involve construction activities that may temporarily increase the risk of ignition from equipment and human activity. However, the number of residents and structures exposed to wildfire risk would be lower than under the proposed project due to the reduced scale of development. This would reduce the overall level of risk and potential emergency response demand in the event of a wildfire.

Construction-related wildfire risks, such as those associated with heavy equipment or temporary ignition sources, would still occur but would be more limited in duration and extent. Operational wildfire risk would be addressed through compliance with applicable building and fire codes, including requirements for defensible space, fire-resistant materials, and emergency access. These measures would reduce wildfire risk to an acceptable level consistent with regulatory standards. While the types of wildfire-related impacts would be similar to the proposed project, the reduced number of units and elimination of the retail/commercial space would limit exposure and potential consequences. Additionally, the reduced site intensity may provide marginal improvements in emergency access and evacuation efficiency compared to more intensive development scenarios. Accordingly, wildfire impacts would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the 650-Unit Alternative would reduce wildfire impacts by limiting the number of residents and structures exposed to wildfire risk and reducing construction-related ignition sources. Overall, the 650-Unit Alternative would result in less than significant wildfire impacts, similar to the proposed project, as shown in Table 6-2.

6.5 Alternative 4: Retention of the Administrative Building Alternative

6.5.1 Description

The Retention of the Administrative Building Alternative ("Retention Alternative") assumes retention of the existing administrative building on the project site, which would be repurposed for storage rather than County operations. Due to its age and substantial deferred maintenance liability, the existing administration building would not be suitable for continued long-term occupancy without significant capital investment. County analyses have identified a substantial and growing deferred maintenance backlog across campus facilities, and prior evaluations concluded that continued investment in aging buildings would be less cost-effective than replacement, with refurbishment costs exceeding or approaching the cost of new construction over the long term. Accordingly, under this alternative, the existing administrative building would function as a largely non-operational facility.

Under this alternative, development would include construction of a new approximately 250,000-square-foot office building with a maximum height of five stories and a 7,000-13,000-square-foot ECC, consistent with the proposed project. Preservation of the existing administration building would result in a reduction of roughly 260 parking spaces. Parking would be accommodated through a combination of existing, new surface parking, and construction of a new, two-bay, three-story parking structure measuring approximately 125 feet by 245 feet by 30 feet high. Similar to Alternative 3, residential development under this alternative would be included but limited to a maximum height of four stories, resulting in a maximum of 650 housing units. No retail/commercial space would be constructed under this alternative.

This alternative would meet several of the Project Objectives by providing housing opportunities on the CAC site and supporting implementation of the County's Housing Element and RHNA obligations. The new office building would also support continued County operations and modernization of facilities. However, retention of the administrative building, combined with site constraints and reduced residential height would limit redevelopment efficiency and the ability to fully maximize housing production, including affordable housing and housing for County employees. In addition, maintaining the existing structure would perpetuate ongoing maintenance costs and inefficiencies associated with an aging facility, rather than addressing the underlying drivers of long-term capital expenditures.

6.5.2 Impact Analysis

a. Aesthetics

Retention of the existing building would preserve a component of the site's current visual character, including its architectural form and historical presence, while new development would introduce

updated building massing and design elements. Unlike the proposed project, this alternative would also introduce a new parking structure, which would constitute an additional visual feature not previously present on the site. Although the parking structure would be up to three stories in height, which is one story shorter than the proposed residential development under this alternative, it would contribute to increased visual bulk and alter views of the site. Additionally, the introduction of new buildings, including a five-story office building and 650 residential units, would also alter the visual character of the site, particularly in terms of scale, bulk, and architectural cohesion.

The retention of the administrative building may also constrain site layout and result in less cohesive or efficient design compared to the proposed project. As with the proposed project, impacts related to visual character and light and glare would occur due to new lighting sources and building design features. Implementation of Mitigation Measures AES-1 and AES-2 would ensure context-sensitive design and minimize light and glare impacts. While this alternative would reduce some aspects of visual change through preservation of the existing building, the addition of the parking structure and new development would still result in substantial alterations to the site. Accordingly, aesthetic impacts would be reduced compared to the proposed project but would remain similar overall, with less than significant impacts for some components and significant and unavoidable impacts for residential design elements.

Summary

Compared to the proposed project, the Retention Alternative would reduce aesthetic impacts by preserving an existing architectural building. However, the introduction of a new parking structure as well as the proposed residential development would still alter the visual character of the site. Overall, the Retention Alternative would result in significant and unavoidable impacts to aesthetics, similar to the proposed project, as shown in Table 6-2.

b. Air Quality

The Retention Alternative would involve construction activities similar to the proposed project, including development of new CAC, residential units, and surface parking facilities. However, unlike the proposed project, the Retention Alternative would also include the construction of a parking structure. Because the administrative building would be retained and repurposed rather than demolished, the number of residential units would be reduced, and there would be no retail/commercial space added, total construction-related emissions would be slightly reduced due to avoided demolition and construction activities. Operational emissions would also be reduced compared to the proposed project due to the reduced residential intensity and eliminated retail/commercial space.

Despite these reductions, construction and operational emissions would still occur and could exceed applicable air quality thresholds without mitigation. Implementation of Mitigation Measures AQ-1 and AQ-2 would be required to reduce operational emissions and control fugitive dust during construction. With mitigation incorporated, impacts would be reduced to less than significant levels. While the types of impacts would be similar to the proposed project, including emissions generation and exposure of nearby receptors, the magnitude would be slightly reduced. Accordingly, air quality impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce air quality impacts by avoiding demolition of the existing administrative building and reducing overall construction and operational emissions. Overall, the Retention Alternative would result in less than significant air quality impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

c. Biological Resources

The Retention Alternative would involve redevelopment of the site with a slightly constrained footprint due to the presence of the retained building. While overall disturbance would still occur, some areas may remain undisturbed compared to the proposed project, resulting in a minor reduction in vegetation removal and site disturbance. However, construction activities would still involve removal of landscaping and potential impacts to nesting birds.

Implementation of Mitigation Measure BIO-1 would be required to ensure protection of nesting birds during construction. Because the site remains highly developed and does not contain sensitive habitats, impacts would be limited. While the nature of impacts would be similar to the proposed project, including disturbance to biological resources, retention of the building and reduction in residential units would reduce the extent of disturbance, even with the addition of the parking structure. Accordingly, impacts would be less than significant with mitigation incorporated and slightly reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce impacts to biological resources by limiting the extent of ground disturbance and vegetation removal associated with a constrained development footprint. Overall, the Retention Alternative would result in less than significant impacts to biological resources with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

d. Cultural Resources

The Retention Alternative would preserve the existing Administration Building, which has been identified as eligible for the California Register of Historical Resources. By avoiding demolition of this structure, the alternative would avoid the significant and unavoidable impact to historical resources associated with the proposed project. Accordingly, Mitigation Measures CUL-1a and CUL-1b would not be required under this alternative.

Ground-disturbing activities associated with remaining site development could still affect archaeological resources. Implementation of Mitigation Measures CUL-2a and CUL-2b would reduce impacts related to unknown subsurface resources to less than significant. While other cultural resource impacts would be similar, avoiding demolition of the Administration Building would eliminate the significant and unavoidable impacts identified for historical resources. Accordingly, impacts to cultural resources would be less than significant with mitigation and no significant and unavoidable impacts to historical resources would occur. Overall, impacts to cultural resources would be reduced under this alternative compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce impacts to cultural resources by avoiding demolition of the historically eligible Administration Building and eliminating the significant and unavoidable impact to historical resources. Overall, the Retention Alternative would result in less than significant impacts to cultural resources with mitigation incorporated for archaeological resources, whereas the proposed project would result in significant and unavoidable impacts to historical resources, as shown in Table 6-2.

e. Energy

The Retention Alternative would increase energy demand compared to existing conditions due to construction and operation of new residential and office buildings. However, the retained administrative building would be used for storage and would not require substantial operational energy, thereby marginally increasing inefficiencies due to continued use of an older, less energy-efficient structure.

Compared to the proposed project, which would replace older buildings with more efficient systems, this alternative may result in slightly less overall energy efficiency. In addition, the reduction of approximately 260 surface parking spaces would decrease the area available for solar canopy installations, resulting in a smaller solar microgrid and reduced onsite renewable energy generation capacity compared to the proposed project. This reduction in renewable energy production would further diminish overall energy efficiency and increase reliance on offsite energy sources.

Nonetheless, overall energy demand would be somewhat reduced compared to the proposed project due to lower residential intensity, elimination of full administrative operations in the retained building, and elimination of the retail/commercial space. Compliance with Title 24 and CALGreen standards for new development would ensure efficient use of energy in new buildings. The types of impacts would be similar, although the alternative would involve a tradeoff between lower overall energy demand and reduced onsite renewable energy generation and efficiency. Accordingly, impacts would be less than significant and similar to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would result in similar energy impacts, with reduced overall energy demand but minor inefficiencies associated with continued use of the existing building and a reduction in onsite renewable energy generation due to the smaller solar microgrid. Overall, the Retention Alternative would result in less than significant impacts related to energy use, similar to the proposed project, as shown in Table 6-2.

f. Geology and Soils

The Retention Alternative would involve construction activities similar to the proposed project, including grading and excavation, although slightly reduced due to retention of an existing structure and reduced residential units. This would reduce the extent of soil disturbance and potential exposure to geologic hazards compared to complete redevelopment.

Implementation of Mitigation Measure GEO-1 would ensure appropriate geotechnical design and minimize risks related to seismic hazards and soil conditions. While impacts would be similar in type, including exposure to seismic shaking and liquefaction risks, they would be slightly reduced in

magnitude. Accordingly, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce geology and soils impacts by limiting the extent of ground disturbance and redevelopment. Overall, the Retention Alternative would result in less than significant impacts related to geology and soils with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

g. Greenhouse Gas Emissions

The Retention Alternative would generate greenhouse gas emissions from construction and operation, similar to the proposed project. However, reduced demolition activity, elimination of the retail/commercial space, and a reduction of approximately 850 residential units relative to the proposed project would result in somewhat lower emissions overall.

The retained building's operational inefficiency and the construction of a new three-story parking structure would offset some benefits of reduced demolition emissions and reduced residential units. While development of a surface parking lot under the proposed project would result in lower construction-related emissions than development of a parking structure, the parking structure would provide a similar number of parking spaces and would have comparable operational emissions to the proposed project. However, this alternative would result in 850 fewer residential units and would result in corresponding emissions reductions.

Implementation of Mitigation Measure GHG-1 and incorporation of energy-efficient systems in new buildings would reduce emissions. While impacts would remain similar in type, overall emissions would be modestly reduced. Accordingly, impacts would be less than significant with mitigation incorporated and slightly reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce greenhouse gas emissions by limiting demolition and overall development intensity, although some emissions associated with retaining the existing building and construction of the parking structure would occur. Overall, the Retention Alternative would result in less than significant greenhouse gas impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

h. Hazards and Hazardous Materials

The Retention Alternative would reduce the extent of demolition and therefore reduce exposure to hazardous materials such as asbestos and lead-based paint. However, some demolition and construction activities would still occur. The marginally reduced extent of redevelopment would lessen the overall potential for exposure relative to the proposed project as operational use of hazardous materials would also be reduced due to the absence of retail/commercial uses. While impacts would be similar in type, including exposure risks during demolition, they would occur at a reduced scale.

Implementation of Mitigation Measure HAZ-1 would ensure safe handling of hazardous materials. Retention of the building would avoid disturbance of materials within that structure. Impacts would be similar but slightly reduced. Accordingly, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce impacts related to hazards and hazardous materials by limiting demolition and construction activities and eliminating retail/commercial uses, and the exposure risks associated with those activities and uses. Overall, the Retention Alternative would result in less than significant impacts to hazards and hazardous materials with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

i. Hydrology and Water Quality

The Retention Alternative would modify drainage patterns and increase impervious surfaces through new development, similar to the proposed project. However, the reduced number of residential units and the retention of the administrative building and associated site constraints may slightly limit the extent of new impervious coverage. This could result in marginally reduced stormwater runoff volumes compared to a fully redeveloped site configuration. Construction activities would still expose soils to erosion and sedimentation, requiring standard controls.

As with the proposed project, compliance with SWPPP requirements, MS4 permits, and LID standards would minimize impacts to water quality and drainage systems. These requirements would ensure that post-construction runoff is managed effectively and that pollutants are treated prior to discharge. While hydrologic impacts such as increased runoff and drainage modifications would still occur, their magnitude would be slightly reduced due to constrained development intensity. The types of impacts would remain similar, including runoff and water quality considerations. Accordingly, impacts would be less than significant and slightly reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce hydrology and water quality impacts by limiting the extent of impervious surfaces and stormwater runoff associated with the new proposed site development. Overall, the Retention Alternative would result in less than significant impacts to hydrology and water quality, similar to the proposed project, as shown in Table 6-2.

j. Land Use and Planning

The Retention Alternative would introduce new residential and office development supportive of applicable County land use plans and housing policies, while retaining an existing administrative structure. This would result in a slightly less efficient land use pattern compared to the proposed project due to constraints imposed by the retained building.

The absence of retail/commercial uses would further reduce mixed-use integration and on-site amenities. However, it would not result in inconsistencies with applicable land use plans or policies. Retention of the administrative structure would not physically divide the community but could constrain circulation or layout flexibility. The types of land use impacts would be similar, though slightly less intensive due to reduced development scale. Accordingly, impacts would be less than significant and similar to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would result in similar land use impacts, with a slightly less efficient site layout due to retention of the existing administrative building and no mixed-use integration. Overall, the Retention Alternative would result in less than significant impacts related to land use and planning, similar to the proposed project, as shown in Table 6-2.

k. Noise

The Retention Alternative would result in construction and operational noise similar to the proposed project. Demolition-related noise would be reduced due to retention of the existing building; however, construction of the new parking structure would introduce additional noise-generating activities that would offset some of these reductions. As a result, overall construction noise duration and intensity would be generally comparable to the proposed project. Operational noise from residential and office uses would still occur, but there would be no operational noise associated with retail/commercial uses as that use is not included in this alternative.

Implementation of Mitigation Measures NOI-1 and NOI-2 would reduce noise levels to meet County standards. Noise impacts, including construction and traffic noise, would be similar in type and intensity to the proposed project although slightly reduced in magnitude. Accordingly, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce noise impacts by limiting demolition-related noise and reducing overall construction intensity. Overall, the Retention Alternative would result in less than significant noise impacts with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

l. Public Services and Recreation

The Retention Alternative would increase demand for public services, including fire protection, police services, schools, and parks, due to the introduction of new residential units on the project site. However, because this alternative includes fewer units than the proposed project and does not include retail/commercial uses, the overall increase in population and service demand would be lower. Fire and law enforcement services would continue to be provided by existing facilities that serve the surrounding area, and the reduced scale of development would lessen the incremental demand placed on these services. Similarly, the number of school-aged children generated by the this alternative would be lower, reducing potential impacts to school district capacity compared to the proposed project.

This alternative would also generate demand for parks and recreational facilities, although at a reduced level compared to the proposed project. Existing and planned recreational facilities within the surrounding area would continue to serve the project site, and the smaller population increase would limit the intensity of use and demand on parks and recreational facilities.

While the types of public service impacts would be similar to the proposed project, including increased demand for emergency services, schools, and recreation, the magnitude of demand would be somewhat reduced. Accordingly, impacts to public services and recreation would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce impacts to public services and recreation by limiting population growth and associated demand for services and facilities. Overall, the Retention Alternative would result in less than significant impacts to public services and recreation, similar to the proposed project, as shown in Table 6-2.

m. Transportation

The Retention Alternative would generate vehicle trips and increase VMT due to the introduction of new residential uses and a new office building, similar to the proposed project. However, the reduced number of residential units and absence of retail/commercial uses would eliminate a source of additional daily and peak-hour trips, thereby reducing overall trip generation.

Under the 650-Unit Alternative, impacts to roadways, transit, and bicycle and pedestrian would still occur, just at a proportionally smaller and more limited extent. Similar to the proposed project, residents would have access to existing transit, bicycle, and pedestrian infrastructure, which could help reduce reliance on vehicle travel. Because the alternative would still introduce new travel demand, the types of impacts would be similar, but their scale would be reduced. Accordingly, transportation impacts would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce transportation impacts by limiting overall trip generation and VMT due to the reduced number of residential units and the absence of retail/commercial uses. Overall, the Retention Alternative would result in less than significant transportation impacts, similar to the proposed project, as shown in Table 6-2.

n. Tribal Cultural Resources

The Retention Alternative would involve ground-disturbing activities associated with construction of new residential and office buildings, as well as the construction of a four-story parking structure, which could result in the inadvertent discovery or disturbance of tribal cultural resources. However, retention of the administrative building and the reduction in the number of residential units would reduce the total extent of excavation and grading compared to the proposed project, thereby reducing the overall likelihood of encountering subsurface resources. The site has been previously developed, which limits but does not eliminate the potential for intact tribal cultural materials.

As with the proposed project, implementation of Mitigation Measures TCR-1 and TCR-2 would be required. While the nature of potential impacts would remain similar, including the risk of inadvertent discovery, the reduced extent of disturbance would lower overall risk. With mitigation incorporated, impacts would be reduced to less than significant levels. Accordingly, impacts would be less than significant with mitigation incorporated and reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce impacts to tribal cultural resources by limiting the extent of ground disturbance and potential for discovery. Overall, the Retention Alternative would result in less than significant impacts to tribal cultural resources with mitigation incorporated, similar to the proposed project, as shown in Table 6-2.

o. Utilities and Service Systems

The Retention Alternative would increase demand for utilities and service systems, including water supply, wastewater treatment, stormwater infrastructure, solid waste services, and energy distribution, due to the introduction of new residential and office uses. However, the absence of retail/commercial uses and the reduction in the number of residential units would reduce overall water use, wastewater generation, and solid waste production.

The project site is located within an area that is already served by existing utility infrastructure, and these systems would continue to provide service under this alternative. While demand would increase compared to existing conditions, the incremental increase would remain within the capacity of existing or planned infrastructure systems. Compliance with applicable regulations, including water conservation standards, stormwater management requirements, and solid waste diversion mandates, would ensure that environmental impacts related to utilities are minimized. The retained building, as an older structure, may be less efficient in terms of utility use; however, its limited operational use would reduce the overall effect of this inefficiency. While the types of impacts would be similar to the proposed project, including increased demand on utility systems, the magnitude of these impacts would be somewhat reduced. Accordingly, impacts to utilities and service systems would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce impacts to utilities and service systems by lowering overall demand associated with the absence of retail/commercial uses and the reduction in the number of residential units. Overall, the Retention Alternative would result in less than significant impacts to utilities and service systems, similar to the proposed project, as shown in Table 6-2.

p. Wildfire

The Retention Alternative would introduce new residential units and occupied office space that would be exposed to wildfire hazards, similar to the proposed project. However, the overall number of occupants at risk would be slightly reduced due to the lower development intensity. The presence of an older, seismically deficient structure used for storage would not substantially increase wildfire risk, but it may not incorporate modern fire-resistant design features found in new construction.

Construction activities would temporarily increase wildfire risk due to the presence of heavy equipment, potential ignition sources, and human activity. Compliance with applicable fire codes and regulations, including requirements for defensible space, fire-resistant materials, emergency access routes, and water supply for fire suppression, would minimize wildfire risks associated with new development. Additionally, the reduced site intensity may provide marginal improvements in emergency access and evacuation efficiency compared to more intensive development scenarios. While the types of wildfire impacts would be similar to the proposed project, including increased

exposure and potential ignition sources, the overall level of risk would be slightly reduced. Accordingly, wildfire impacts would be less than significant and reduced compared to the proposed project.

Summary

Compared to the proposed project, the Retention Alternative would reduce wildfire impacts by limiting the number of residents and structures exposed to wildfire risk and reducing overall development intensity. Overall, the Retention Alternative would result in less than significant wildfire impacts, similar to the proposed project, as shown in Table 6-2.

6.6 Environmentally Superior Alternative

Table 6-2 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed project for each of the issue areas studied. Based on the alternatives analysis provided above, the 200-Unit Alternative would reduce the greatest overall number and magnitude of environmental impacts among the build alternatives but the Retention of the Administrative Building Alternative would be the environmentally superior alternative under CEQA.

CEQA requires identification of the environmentally superior alternative based on a comparison of environmental impacts across all alternatives. As reflected in the analysis above, the No Project Alternative (Alternative 1) would result in the fewest environmental impacts because it would avoid new development entirely and would maintain existing conditions. As such, the No Project Alternative would be considered the Environmentally Superior Alternative under CEQA.

However, CEQA further requires identification of an environmentally superior alternative among the build alternatives when the No Project Alternative is environmentally superior. Among the remaining alternatives evaluated, the 200-Unit Alternative (Alternative 2) would result in the lowest level of environmental impact overall. This is primarily due to the substantially reduced development intensity, including fewer residential units, lower overall site activity, and elimination of the retail/commercial component. Compared to the 650-Unit Alternative and the Retention of the Administrative Building Alternative, the 200-Unit Alternative consistently results in reduced impacts related to air quality, greenhouse gas emissions, transportation, public services, utilities, and noise, while avoiding the higher intensity of development associated with the other build alternatives.

Notwithstanding these overall reductions, Alternative 2 would not avoid the significant and unavoidable impact to cultural resources identified for the proposed project. In contrast, the Retention of the Administrative Building Alternative (Alternative 4) would avoid this significant and unavoidable impact by preserving the historical resource. Although Alternative 4 would not reduce impacts to the same extent as the 200-Unit Alternative across other issue areas and may result in similar or slightly greater impacts in certain categories due to design and site constraints, its ability to avoid a significant and unavoidable impact to cultural resources is a key consideration under CEQA.

Accordingly, while the 200-Unit Alternative would result in the greatest overall reduction in environmental impacts, the Retention of the Administrative Building Alternative is identified as the Environmentally Superior Alternative among the build alternatives because it avoids the project's significant and unavoidable impact to cultural resources, thereby providing an important environmental benefit that outweighs the incremental increases in other, less-than-significant impact areas.

Table 6-2 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative	Alternative 2: 200-Unit Alternative	Alternative 3: 650-Unit Alternative	Alternative 4: Retention of the Administrative Building Alternative
Aesthetics	Significant and Unavoidable	+	+	+	+
Air Quality	Less than Significant with Mitigation Incorporated	+	+	+	+
Biological Resources	Less than Significant with Mitigation Incorporated	+	+	+	+
Cultural Resources	Significant and Unavoidable	+	=	=	+
Energy	Less than Significant	+	+	+	=
Geology and Soils	Less than Significant with Mitigation Incorporated	+	+	+	+
Greenhouse Gas Emissions	Less than Significant	+	+	+	+
Hazards and Hazardous Materials	Less than Significant with Mitigation Incorporated	+	+	+	+
Hydrology and Water Quality	Less than Significant	+	+	+	+
Land Use and Planning	Less than Significant	+	=	=	=
Noise	Less than Significant with Mitigation Incorporated	+	+	+	+
Public Services and Recreation	Less than Significant	+	+	+	+
Transportation	Less than Significant	+	+	+	+
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	+	+	+	+
Utilities and Service Systems	Less than Significant	+	+	+	+
Wildfire	Less than Significant	+	+	+	+

+ Superior to the proposed project (reduced level of impact)

- Inferior to the proposed project (increased level of impact)

= Similar level of impact to the proposed project

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