



ENVIRONMENTAL REVIEW

PURSUANT TO CALIFORNIA PUBLIC RESOURCES CODE
CEQA GUIDELINES SECTION 15183

Redwood Row Project

LEAD AGENCY:

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

PREPARED BY:



METROPOLITAN PLANNING GROUP

APRIL 2025

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REDWOOD ROW

Project Title:	Redwood Row
Lead Agency:	City of Cotati: Community Development Department 201 West Sierra Avenue Cotati, CA 94931
Contact Person:	Jon-Paul Harries, Senior Planner 707-665-3634
Project Location:	Gravenstein Highway, City of Cotati, Sonoma County, California APNs: 046-286-017, -018, 019, and -020
Project Sponsor(s)/Owners:	Adam Foster City Ventures 1185 Mason Street San Francisco, CA 94123 (925) 323-0443 afoster@cityventures.com
General Plan Designation:	General Commercial (GC)
Zoning:	Commercial, Gravenstein Corridor (CG)
Description of project:	The Project will merge four existing lots totaling 10.62 acres and subdivide them into two lots for the purpose of constructing a mixed-use multi-family development with 26 buildings containing a total of 178 residential units (134 townhomes and 44 deed restricted affordable units) and 16 commercial units and 33 optional Accessory Dwelling Units. The Project includes the development of an internal circulation network of roads, pathways, and vehicle and bicycle parking. Other onsite improvements include a park, swimming pool, open space, play area, lighting, landscaping, and associated infrastructure including water and sewer. Required offsite improvements along the Gravenstein Highway (SR-116) frontage include construction of a multi-use path and site access from SR-116.
Surrounding land uses and setting; briefly describe the project's surroundings:	The Project site is bounded by Gravenstein Highway (SR-116) to the south, Lowe's Home Improvement to the north, undeveloped land to the west, a housing development to the northwest, and a restaurant and Redwood Drive to the east. The approximately 10.62-acre Project site is undeveloped, consisting primarily of ruderal vegetation and scattered trees. The site is relatively flat due to mass grading in 2002 in preparation for the Cotati Commons project, previously known as the South Sonoma Business Park (SSBP) project, approved in 2001.

Other public agencies whose approval is required:	Caltrans Sonoma County Regional Water Quality Control Board California Department of Fish and Wildlife
Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?	The City of Cotati notified California Native American Tribes in accordance with Public Resources Code §21080.3.1. Notice and Cultural Resources Evaluation was sent to the Federated Indians of Graton Rancheria on November 15, 2024. A written request for consultation, dated December 3, 2024, was received from the Federated Indians of Graton Rancheria. The City met with the Tribe on January 27, 2025 and the tribe requested that canine surveys be conducted on the property. Canine surveys were conducted on March 5, 2025 and the results of the surveys along with recommended conditions were provided to the Tribe on March 19, 2025. The City sent a follow up message on April 2, 2025 with no response and on April 9, 2025 the City notified the tribe that it considered the consultation satisfied.

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ACRONYMS AND ABBREVIATIONS

APN	ASSESSOR PARCEL NUMBERS
BAAQMD	BAY AREA AIR QUALITY MANAGEMENT DISTRICT
BMP	BEST MANAGEMENT PRACTICE
CCR	CALIFORNIA CODE OF REGULATIONS
CDFW	CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
CEQA	CALIFORNIA ENVIRONMENTAL QUALITY ACT
CNEL	COMMUNITY NOISE EQUIVALENT LEVEL
CNPS	CALIFORNIA NATIVE PLANT SOCIETY
CRHR	CALIFORNIA REGISTER OF HISTORICAL RESOURCES
CRPUSD	COTATI-ROHNERT PARK UNIFIED SCHOOL DISTRICT
CTS	CALIFORNIA TIGER SALAMANDER
dBA	A-WEIGHTED DECIBEL
DMA	DRAINAGE MANAGEMENT AREA
DPM	DIESEL PARTICULATE MATTER
DPR	DEPARTMENT OF PARKS AND RECREATION
EIR	ENVIRONMENTAL IMPACT REPORT
EVA	EMERGENCY VEHICLE ACCESS
FIGR	FEDERATED INDIANS OF GRATON RANCHERIA
GHG	GREENHOUSE GAS
gpd	GALLONS PER DAY
LID	LOW IMPACT DEVELOPMENT
LWWTP	LAGUNA WASTEWATER TREATMENT PLANT
MBTA	MIGRATORY BIRD TREATY ACT
mph	MILES PER HOUR
NPDES	NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
NAHC	NATIVE AMERICAN HERITAGE COMMISSION
NHPA	NATIONAL HISTORIC PRESERVATION ACT
NRHP	NATIONAL REGISTER OF HISTORIC PLACES
NWIC	NORTHWEST INFORMATION CENTER
OEHHA	CALIFORNIA OFFICE OF ENVIRONMENTAL HEALTH HAZARDS ASSESSMENT
PRC	PUBLIC RESOURCES CODE
RCPA	REGIONAL CLIMATE PROTECTION AGENCY
ROG	REACTIVE ORGANIC GAS
RWQCB	REGIONAL WATER QUALITY CONTROL BOARD
SCH	STATE CLEARINGHOUSE
SMART	SONOMA-MARIN AREA RAIL TRANSIT
SR	STATE ROUTE
SRPCS	SANTA ROSA PLAIN CONSERVATION STRATEGY
SSBP	SOUTH SONOMA BUSINESS PARK
SWPPP	STORM WATER POLLUTION PREVENTION PLAN
SWRCB	STATE WATER RESOURCES CONTROL BOARD
TCR	TRIBAL CULTURAL RESOURCE
UST	UNDERGROUND STORAGE TANK
UWMP	URBAN WATER MANAGEMENT PLAN
µg/M ³	MICROGRAMS PER CUBIC METER

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1. INTRODUCTION

This California Environmental Quality Act (CEQA) Analysis evaluates consistency with the City's 2013 General Plan EIR to identify any new or more significant impacts from the proposed project, which includes a Vesting Tentative Map for a 10.62 acre parcel, including dedication of parkland and entitlement for Design Review and a Tree Removal Permit to construct 26 buildings (~45 feet tall) containing 178 residential units (134 market-rate townhomes (245,084 sf), 44 affordable apartments(~35,000 sf) and 16 commercial spaces (10,032 square feet), a swimming pool, park, landscaping, lighting, roof-top solar panels, and associated infrastructure improvements (the "Project").

1.1. OVERVIEW OF CEQA ANALYSIS

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

This CEQA Analysis uses CEQA Guidelines Sections 15183, which provides a streamlined review of the Project by tiering from the program level analysis prepared for the Cotati General Plan and its certified Environmental Impact Report (EIR), thereby focusing the analysis to potential site-specific impacts of the project relative to the impacts analyzed in the program level EIR. Section 15183 of the CEQA Guidelines mandates that projects which are determined to be consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. The analysis provided herein tiers from the program level analysis prepared for the 2013 City of Cotati General Plan and its EIR (SCH No. 2013082037), which was certified in 2015, and for which an addendum was prepared in 2023 with adoption of the City of Cotati 2023-2031 Housing Element. This CEQA Analysis describes the proposed project and its environmental setting, including the project site's existing conditions and applicable regulatory requirements, and provides an assessment of the project's consistency with the City of Cotati General Plan. All General Plan policies adopted as mitigation apply to the project as described herein.

1.2. PURPOSE AND SUMMARY OF THIS CEQA DOCUMENT

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

1.3. PUBLIC REVIEW PROCESS

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

Commission and approval of Tentative Map Approval, Tree Removal Permit, and Design Review by the City Council.

2. PROJECT DESCRIPTION

2.1. BACKGROUND

The Project site is located on the southeastern portion of the South Sonoma Business Park (SSBP), for which the SSBP EIR (SCH#2000052045) was certified and the SSBP Project approved by the City of Cotati on June 13, 2001, and subsequently amended. Following approval of the SSBP Project, grading of the SSBP project site, including the subject Project site occurred in 2002; construction of the Cotati Cottages, a 46 dwelling units residential project immediately north of the subject Project site, and public improvements to Alder Avenue occurred in 2004; and construction of a portion of the Cotati Commons Marketplace, consisting of a 165,382 Lowe's Home Improvement store, occurred in 2006.

Addendum #2 to the 2001 SSBP EIR was prepared in November 2006 and approved by City Council on June 13, 2007 (Resolution #07-24). Addendum No. 2, included evaluation of SR-116 improvements, including frontage improvements that were completely or partially outside the Caltrans right-of-way adjacent to the Project site (e.g. new public sidewalks along the northern edge of SR-116 from the Redwood Drive intersection to Alder Avenue, including handicap ramps, and installation of pedestrian crosswalks north of SR-116 across the primary entrance driveway and Alder Avenue).

An SB330 preliminary application for the Redwood Row Project was received on May 26, 2022 along with an application for Design Review, an Environmental Assessment, and a Vesting Tentative Map. The application(s) were deemed incomplete and not approvable based on objective standards. Several project iterations were submitted after May 26, 2022, but the SB 330 preliminary application expired due to a period of inactivity exceeding six months. A new SB 330 preliminary application was submitted on October 30, 2024, and a final submittal, deemed complete, was received on November 21, 2024. No development has taken place on the subject Project site beyond grading circa 2002. The Project site has since been maintained annually for weed and fire abatement purposes.

Since the SSBP project was originally approved, the City of Cotati updated the General Plan and certified the 2013 General Plan EIR (SCH No. 2013082037) on March 24, 2015. The updated General Plan supersedes the 1998 General Plan under which the 2001 SSBP EIR and subsequent addenda were originally analyzed. The comprehensive update to the General Plan includes policies and programs that apply to the subject Project and infrastructure in the vicinity. Namely, the General Plan calls for the future closure of Alder Avenue from SR-116 and a realignment of West Cotati Avenue coupled with a new signalized intersection to be located at the southwest corner of the Project site at West Cotati and SR-116. The proposed Redwood Row Project incorporates circulation requirements of the updated General Plan. The project includes frontage improvements to SR-116 and through conditions of approval, the applicant is required to participate in the City's Traffic Impact Fee program, which will enable construction of the circulation improvements identified in the General Plan.

2.2. PROJECT LOCATION

The City of Cotati is located in central Sonoma County along the Highway 101 corridor approximately 8 miles south of Santa Rosa and 40 miles north of San Francisco. It is situated in the southern region

of Sonoma County in a low-lying topographical area known as the Santa Rosa Plain. The City has a population of approximately 7,430¹ within approximately 1,217 acres of City-incorporated land.

The Project site is located in the western portion of the City of Cotati, in the County of Sonoma (**Figure 1: Regional Location**). Specifically, the Project site is located along SR-116 between Redwood Drive and the proposed realignment of West Cotati Avenue. It includes four contiguous parcels (APNs 046-286-017, -018, 019, and -020).

SR-116, which fronts the subject property to the south, is a California state highway that is maintained by the California Department of Transportation (Caltrans), connecting US 101 in Cotati to SR 1 on the Sonoma Coast in Jenner. At the project site frontage Gravenstein Highway (SR-116) is a two-lane road with a posted speed limit of 45 miles per hour (mph). Redwood Drive, to the east, is a two-lane roadway that runs north-south parallel to Highway 101 to Rohnert Park. Within the project vicinity Redwood Drive is approximately 60 feet wide with a dedicated left-turn lane onto SR-116 and a dedicated right turn lane from SR-116 onto Redwood Drive and has a posted speed limit of 45 mph.

West Cotati Avenue currently terminates at SR-116 immediately south of the Project site. The General Plan anticipated realignment of West Cotati Avenue and SR-116 as buildout would require an improved signalized intersection. A project to re-align West Cotati Avenue to improve vehicle, bicycle and pedestrian safety, signalize the intersection and widen the highway to accommodate bicycle and pedestrian facilities is in the planning phase and undergoing design by the City of Cotati. The implementation of the West Cotati Ave Realignment project is expected to buildout incrementally as vacant/underutilized parcels along SR-116 are developed and when the City secures funding to install improvements. A consistency analysis under CEQA Guidelines Section 15183 (SCH# 2024090793) was completed for the project and a Notice of Exemption was filed on September 19, 2025.

The Project site is comprised of four contiguous parcels that occupy approximately 10.62 acres. The Project site is vacant and undeveloped, consisting primarily of ruderal vegetation and scattered trees. The site is relatively flat due to mass grading in 2002 in preparation for the Cotati Commons project, previously known as the South Sonoma Business Park (SSBP) project, approved in 2001.

As seen in **Figure 2: Project Vicinity**, the Project site is bounded by SR-116 to the south, Lowe's Home Improvement to the north, a restaurant and Redwood Drive to the east, and an undeveloped parcel to the east (future site of the Cotati Village 1 project). Existing land uses include commercial development to the north, east, and southeast and the Cotati Cottages residential townhouse development to the northwest. Two mixed use multi-family developments have been approved on the two parcels immediately west of the project site. Cotati Village 1, adjacent to the project site, is approved for 177 units and Cotati Village 2, on the western side of Alder Avenue, is approved for 126 units. An undeveloped parcel is located across SR-116 south of the project site.

The Project site is located approximately 1.5 miles west of the Sonoma-Marin Area Rail Transit (SMART) Cotati station and the SMART corridor, approximately 0.75 miles from the Cotati Hub bus station, and the nearest bus stop for bus route 26 operated by Sonoma County Transit is located at SR-116 and Redwood Drive. An additional bus stop is located approximately 0.4 miles from the Project site at the intersection of Old Redwood Highway and St. Joseph Way and is served by Sonoma County Transit Bus Routes 10 and 48 and Golden Gate Transit Bus Route 101 NB/SB. The Project site is bounded by SR-116 to the south and access to Highway 101 is located less than 0.25 miles east of the Project site.

¹ US Census Bureau, City of Cotati, <https://www.census.gov/quickfacts/cotaticitycalifornia>, 2023 Estimate, accessed April 2, 2025.

The Redwood Row project site is one portion of the former, fully mitigated and permitted South Sonoma Business Park (SSBP) project site which was approximately 34 acres. To obtain the state and federal resource agency permits and the City grading permit, the SSBP applicant purchased all necessary mitigation bank credits and mitigation property as required for the SSBP project's proposed impact on the state and federally listed Sebastopol meadowfoam (*Limnanthes vinculans*) and the California tiger salamander (*Ambystoma californiense*). The California Department of Fish and Wildlife (CDFW) is now in control (owner) of those mitigation properties. Subsequent to the SSBP mass grading in 2002, portions of the SSBP project site were fully developed (i.e., Cotati Cottages and Lowe's) and other portions, including the Redwood Row project site, were only graded and the wetlands filled with imported clean dirt, but the site was not developed.

Development of the Redwood Row site was initiated in June 2002 with an approved stockpile and drainage plan which allowed placement of approximately 10,000 cubic yards of clean fill on the site in accordance with the City's approved stockpile and drainage plan (permit numbers 25090, 25154, 25027) and the creation of drainage swales on the property, but the site was not fully developed at that time due to delays from the anticipated CalTrans Highway 116 expansion and then due to the 2008 Great Recession. Although the site has not been built out, it has been actively managed over the past 20+ years to facilitate site drainage and for fire control; annual disking and mowing have been part of the management regime. Additionally, the landowner has been paying annually into the SSBP Assessment District which was established to finance all resource agency required mitigation.

Due to mass grading of the project site in 2002 and the annual maintenance (disking) of the project site since then, there are only two remaining plant communities onsite: ruderal herbaceous, and seasonal/constructed wetlands.

Almost all vegetation within the project site consists of non-native, ruderal herbaceous grasses and forbs (i.e., broad-leaved plants) though there are several valley oak trees (*Quercus lobata*) lining the southeastern border, with a eucalyptus tree and a prominent mature valley oak standing in the middle of the site. Dominant vegetation includes wild oat (*Avena barbata*), Italian ryegrass (*Festuca perennis*), Mediterranean barley (*Hordeum marinum gussoneanum*), and bur medic (*Medicago polymorpha*).

A total of roughly 0.27 acre of seasonal wetlands (five seasonal swales) were created on the Redwood Row project site. These five seasonal wetlands are artificial ditches related to interim construction measures and upland drainage maintenance of the property that has been ongoing since 2002. These features were created to provide drainage on the project site and reduce ponding related to the previous mass grading and stockpiling of the project site.

2.3. GENERAL PLAN AND ZONING

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

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

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

2.4. PROJECT DESCRIPTION

The proposed Project is comprised of a mixed-use development consisting of 26 buildings containing 134 townhome-styled condominiums, 33 optional accessory dwelling units (ADUS), 44 affordable apartments, 10,032 square feet of gross commercial floor area, a pool/community building, pool and pool deck, frontage improvements, vehicle and bicycle circulation and parking, playground, landscaping, lighting, and ancillary improvements.

The townhomes will be three-bedroom units with an optional 4th bedroom/ADU and will range in size from 1,765 sf to 2,183 sf of floor area. Units will have individual garages ranging in size from 496 sf to 565 sf. The 44 affordable housing units (apartments) will have one, two, or three bedrooms and range in size from 550 square feet to 1,150 square feet and will all be located in one structure. Commercial spaces (10,032 sf) will be located on the ground floor of Building A and Building B.

A community pool, play area, and open space are proposed for the center of the site and a triangular shaped park, which will include a large and small dog park are proposed along the western boundary of the project site to the south of the existing park associated with the Cotati Cottages. (**Figure 5: Site Plan**). The Project has been submitted to the City of Cotati subject to the provisions of SB 330, vesting ordinances, fees, policies, and standards applicable to the project and in effect on October 30, 2024.

Proposed Structures and Improvements

The proposed Project site plan, architecture, preliminary improvement plans, and landscaping plans include the following:

Mixed-Use Buildings

Buildings A and B will be a total of three stories with a maximum height of 44 feet. The ground floor of the building will have garages and “front” doors that lead to the townhomes’ primary living space which will be located on the second and third floors. Sixteen commercial spaces ranging in size from 585 square feet to 753 square feet, will be located on the ground floor of the south-facing side of both buildings. The commercial units will face SR-116 and be accessible from the proposed multi-use path that will run along the property frontage. Building A will contain nine residential units and Building B will contain seven residential units.

Townhomes

Buildings C through Building CC will be arranged around the central open space of the project site. Most townhome buildings will hold six units though some will hold as few as three units and Building U will have 8 units. Each townhome building will be three stories tall and an estimated 39 feet in height. There will be a total of 118 units located within the 23 residential townhouse-styled condominium structures. The buildings are arranged so that there is a pedestrian/front entrance located on the side of the building facing toward pedestrian/open space areas. Each will have a front yard with a low fence. Each unit has a proposed garage that is oriented toward the vehicle circulation areas.

Apartment Building

The affordable housing units will be located within a single three-story apartment building located on the eastern portion of the project site. The apartment building structure has a maximum proposed height of 39 feet and covers approximately 16,000 square feet. The primary entrance will be located from the west side of the building accessed from an internal pedestrian foot/bike path that will connect with the multi-use path along SR-116. An additional entrance is proposed on the north side of the building from the parking associated parking lot.

Architecture

The buildings are planned to be founded on a post-tensioned foundation system. The architectural design for the Redwood Row buildings would incorporate contemporary craftsman style elements. All buildings would be three stories in height with pitched roofs and variations in roof line. Each building includes variation in the façade with pop-outs or step backs. Articulation is proposed via variation in exterior materials which would include hardi-board and batt siding, stucco finishes, and Hardi horizontal siding, and brick and stone veneer, as well as single hung windows, brackets, and horizontal railings. Commercial spaces in Buildings A and C will have large glazed storefront windows and shopfront doors. Roofing materials include composition shingle roofing.

Offsite Improvements

Proposed frontage improvements include construction of two new vehicular entrances and an emergency vehicle access road to the property from SR-116 into the development and construction of a 14-foot-wide paved multi-use path along SR-116 frontage. The site frontage improvements planned as part of the Project are consistent with and would tie into the City's proposed West Cotati Avenue intersection and facility improvement along SR-116.

Access and Parking

The Project site is planned to have access from SR-116. The site will be accessed from a 26-foot-wide driveway that will enter the development between buildings A and B. Two additional Emergency Vehicle Access (EVA) points are proposed, one from the Lowe's parking lot and one located at the property's southeastern corner from SR-116. An additional public access will be located west of Building B adjacent to the property line.

The project would have a network of roads and driveways which will provide for internal circulation and access to 268 parking spaces for the townhouses (located within individual garages), 57 parking spaces for the apartments, 34 guest parking spaces, and 41 commercial parking spaces.

Pedestrian access would be accommodated throughout the site via a new shared pedestrian and bicycle path proposed along the SR-116 frontage and proposed internal walkways along the roadways within the site, and around the residential buildings and community spaces.

Landscaping and Lighting

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

The landscaping plan includes the preservation of the prominent existing oak tree located in the center and the oaks along the southeast corner of the site. Landscaping would feature drought tolerant plants and a high efficiency irrigation system, including weather-based controllers. Landscape areas would establish buffers, provide shading, and serve as biofiltration and stormwater detention

facilities. A landscaping strip would provide for tree planting along the southern property line fronting SR-116.

The Project will be required by standard conditions of approval to comply with outdoor lighting standards as provided in the City of Cotati Land Use Code Section 17.30.060.

Water Supply

Potable water would be accommodated via the installation of new water laterals within the development that would connect the new buildings to the existing water main within SR-116. Fire hydrants in compliance with the California Fire Code will be installed throughout the project site to be served by new water connections.

Wastewater

Wastewater would be accommodated via the installation of a new sanitary sewer lateral that would connect to an existing sanitary sewer line located at the north of the property. The new sanitary sewer lines would collect wastewater generated onsite and convey flows through the existing sanitary sewer system to the existing wastewater processing plant for treatment.

Solid Waste

Each garage will provide sufficient space to accommodate three household sized waste bins (trash, recycling, compost). A trash room is proposed on the ground floor at the northeast corner of both Building A and Building B to accommodate waste, recycling, and compost from the commercial units. A trash enclosure is proposed for the northeast corner of the parking lot that would serve the apartment building and will accommodate all three refuse streams.

Storm Drainage Infrastructure

Storm drains would be utilized throughout the project site to direct stormwater from impervious areas to landscape areas, bioretention areas, and other vegetated bio-retention features consistent with the requirements of Low Impact Development throughout the site. Fourteen drainage management areas (DMAs) are proposed to contain and treat stormwater flows throughout the site.

Site Preparation and Construction

For the purpose of this analysis, it is assumed that site preparation and construction would occur between January 2025 and July 2026. Site preparation would initiate with the removal of vegetation and trees. The applicant proposes to remove one eucalyptus tree, however, it is likely that through construction, the oak trees along the SR-116 frontage will also be removed and are included in the tree removal permit.

Grading would occur to achieve proposed site elevations. Preliminary grading plans indicate approximately 18,000 cubic yards of net fill to the site. Following completion of grading activities, infrastructure improvements and building foundations would be constructed. Foundations are proposed to be slab-on-grade. Utilities, storm drains and catch basins would be installed and buildings erected. New driveways, sidewalks, curbs and gutters, striping, landscaping, lighting, and signage would be installed.

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

Density Bonus

The Project applies the provisions of State Density Bonus Law (Government Code 65915) to provide units on site above the base maximum residential density. The base density of the Commercial, Gravenstein Corridor (CG) zone is 15 residential units per acre, which allows for 159 residential units at the Project site. Through the application of the Density Bonus, the project will construct 178 units, not including the 33 optional Accessory Dwelling Units (ADUs), which are not factored into density or density bonus calculations per state law.

The project is also eligible for waivers and concessions that will be applied to the location of inclusionary units, the maximum building height, accessibility requirements for multifamily projects, Minimum FAR for nonresidential use, and setbacks.

Project Objectives

The project objectives are identified as the following:

- Provide for a mix of residential and commercial uses.
- Propose development in CG that meets the minimum density requirements.
- Provide housing to meet the City's Regional Housing Needs Allocation (RHNA).
- Provide affordable units to assist in meeting the City's housing needs.
- Propose development on an infill, underutilized, or vacant parcel designated for urban uses within city limits.
- Propose infill development that can connect to existing utility infrastructure.

Required Discretionary Actions

The applicant is requesting approval of Design Review, a Tree Removal Permit, parkland dedication, and a Vesting Tentative Map to construct a mixed-use development, which consists of 26 buildings that will accommodate up to 211 residential units (including the 33 optional ADUs) and 10,000 square feet of commercial space. The Project applicant has applied to the City of Cotati for the following entitlements:

- Design Review
- Tree Removal Permit
- Vesting Tentative Tract Map (includes parkland dedication)

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

Other Public Agency Review

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

- Sonoma Water (formerly Sonoma County Water Agency) – For review, approval and acceptance of the Project's Stormwater Management Plan
- Caltrans Encroachment Permit
- Regional Water Quality Control Board
- California Department of Fish and Wildlife

California Native American Tribal Consultation

In accordance with Public Resources Code (PRC) Section 21084.2, lead agencies are required to consider Tribal Cultural Resources (TCR) including a site feature, place, cultural landscape, sacred place or object of cultural value to the tribe and is listed on the California Register of Historic Resources (CRHR) or a local register, or the lead agency, at its discretion, chooses to treat resources as such. In accordance with PRC Section 21080.3.1(b)(1), the Federated Indians of Graton Rancheria (FIGR), in a letter dated July 2015, stated that its tribe was traditionally and culturally affiliated with a geographic area within the City of Cotati's geographic area of jurisdiction, and requested formal notice of and information on projects for which the City of Cotati serves as a lead agency under CEQA.

In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the FIGR on November 15, 2024, which included a brief description of the proposed project and its location, the City of Cotati's contact information, the Cultural Resource Evaluation, and a notification that the Federated Indians of Graton Rancheria has 30 days to request consultation pursuant to this section.

The City of Cotati received a response requesting consultation under PRC Section 21080.3.1(b)(2) from the FIGR on December 3, 2024. The City of Cotati entered into consultation with FIGR and provided the requested information on December 5, 2024. A meeting between the City of Cotati and FIGR resulted in a request from the Tribe to conduct additional pre-approval analysis of the site including subsurface testing and canine surveys. Canine Surveys were completed on March 5, 2025 and the results of the surveys, the updated analysis, along with updated Conditions of Approval were provided to FIGR on March 19, 2025, and the City requested a meeting to continue the consultation. No response was received. A follow up email was sent by the City to the Tribe on April 2, with no response. On April 9, 2025 and the City notified the tribe that the City considered the tribal consultation satisfied.

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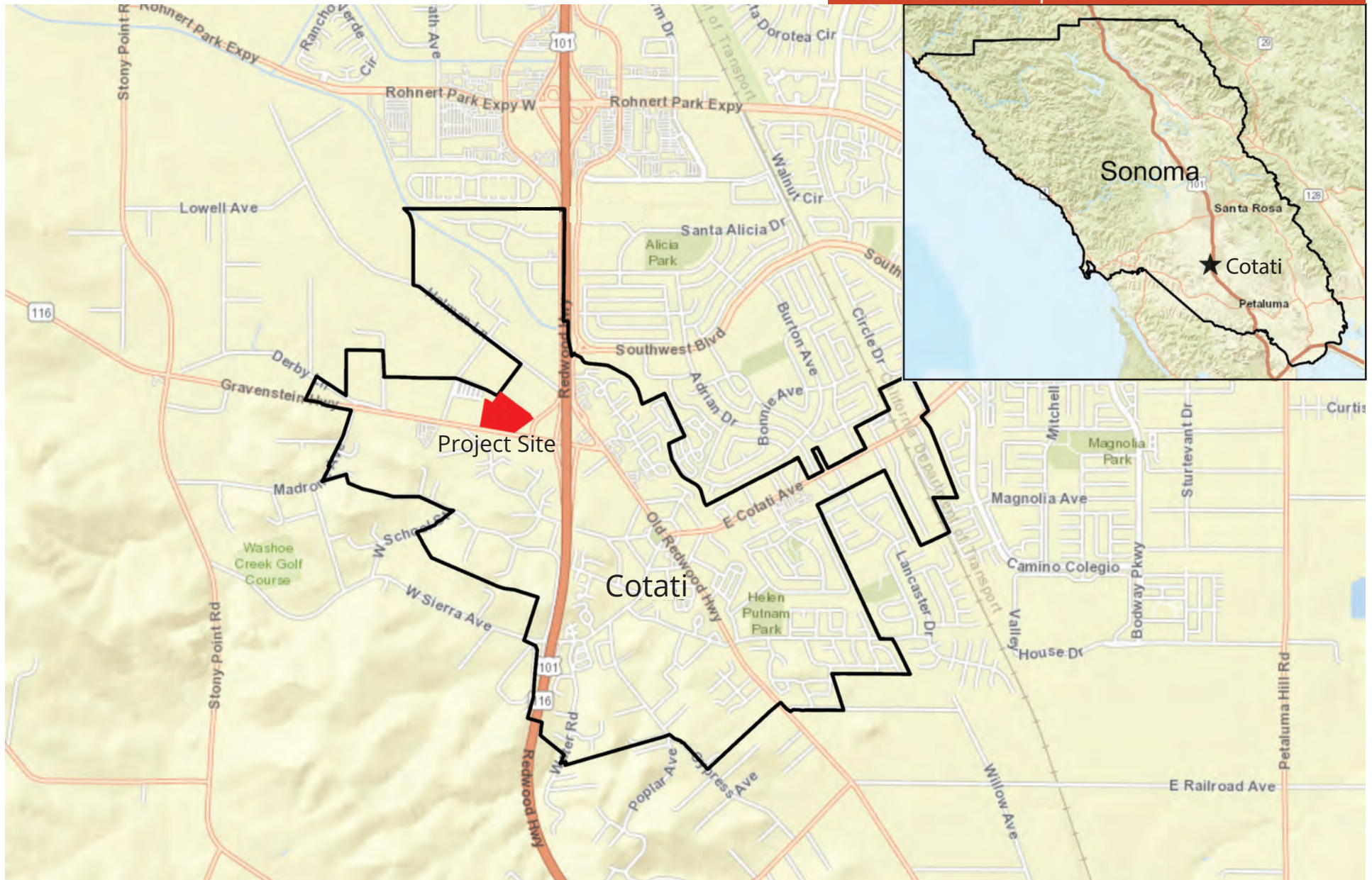
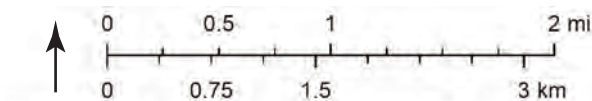


Figure 1: Regional Location



Sonoma County, Bureau of Land Management, Esri, HERE, Garmin, NGA, USGS, NPS



Project Site



City Limits



Sonoma County

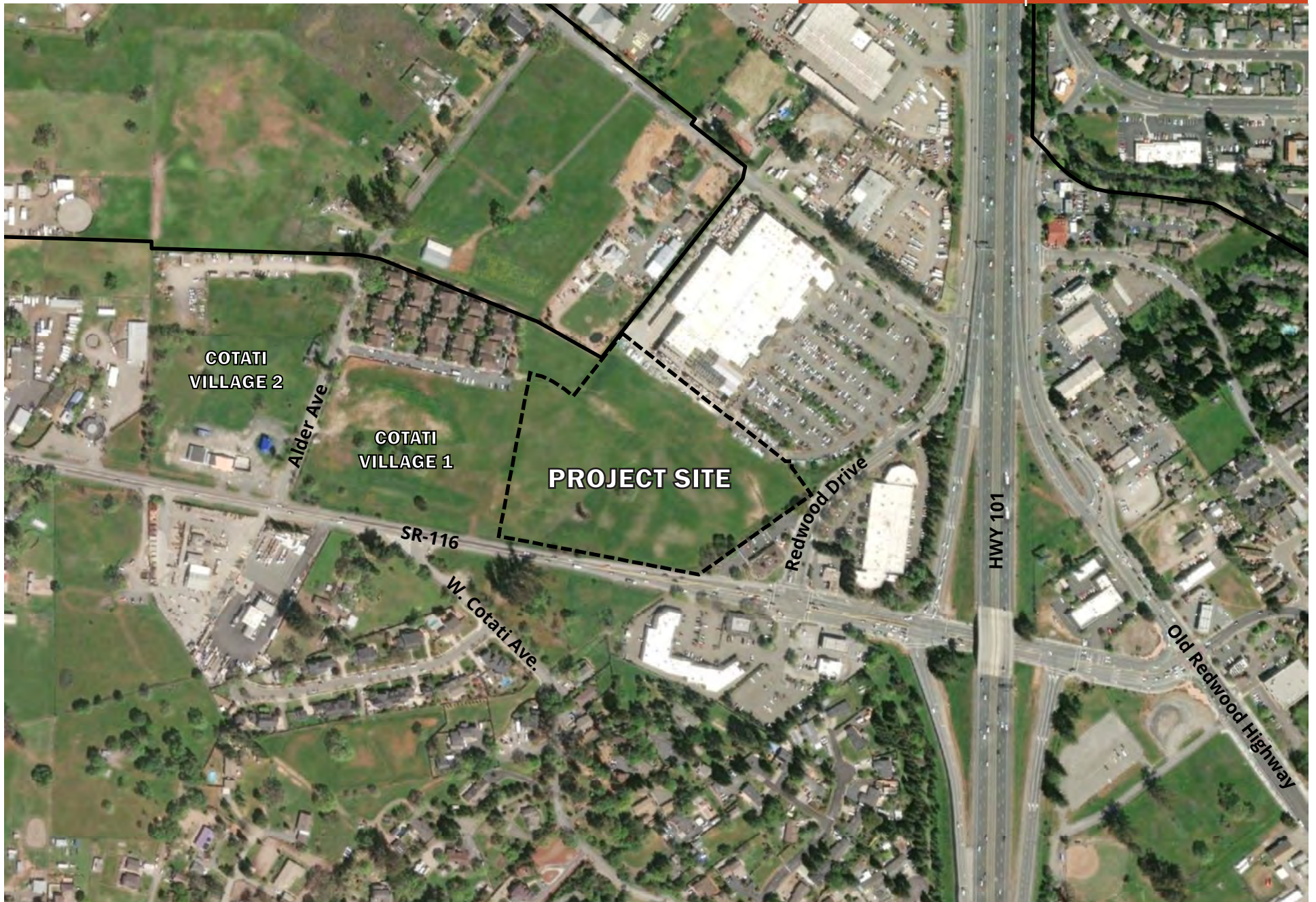














Figure 2: Project Vicinty



Data source: City of Cotati GIS, County of Sonoma GIS

-  PROJECT SITE
-  CITY OF COTATI / SONOMA COUNTY BOUNDARY

-  PROJECT SITE
-  CITY OF COTATI / SONOMA COUNTY BOUNDARY
- ZONING DESIGNATION**
-  COMMERCIAL, GRAVENSTEIN CORRIDOR (CG)
-  COMMERCIAL/INDUSTRIAL DISTRICT (CI)
-  NEIGHBORHOOD, LOW DENSITY (NL)
-  NEIGHBORHOOD, MEDIUM DENSITY (NM)
-  NEIGHBORHOOD, URBAN (NU)
-  OPEN SPACE - RECREATION (OSR)
-  PUBLIC FACILITY DISTRICT (PF)
-  RURAL RESIDENTIAL (RR)
-  RESIDENTIAL VERY LOW DENSITY (RVL)
-  SPECIFIC PLAN, DOWNTOWN (SPD)

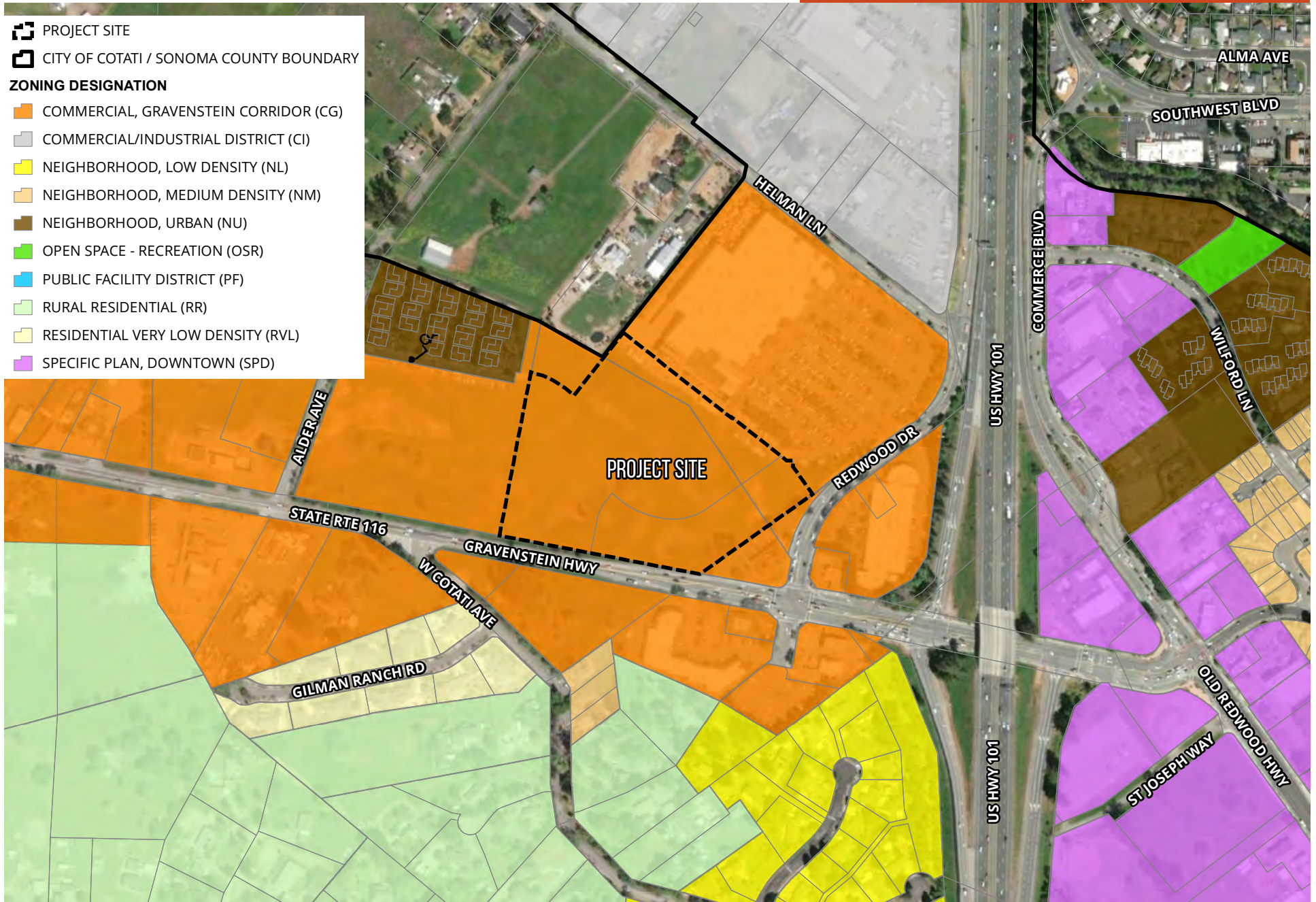


FIGURE 3: ZONING



Data source: City of Cotati GIS, County of Sonoma GIS

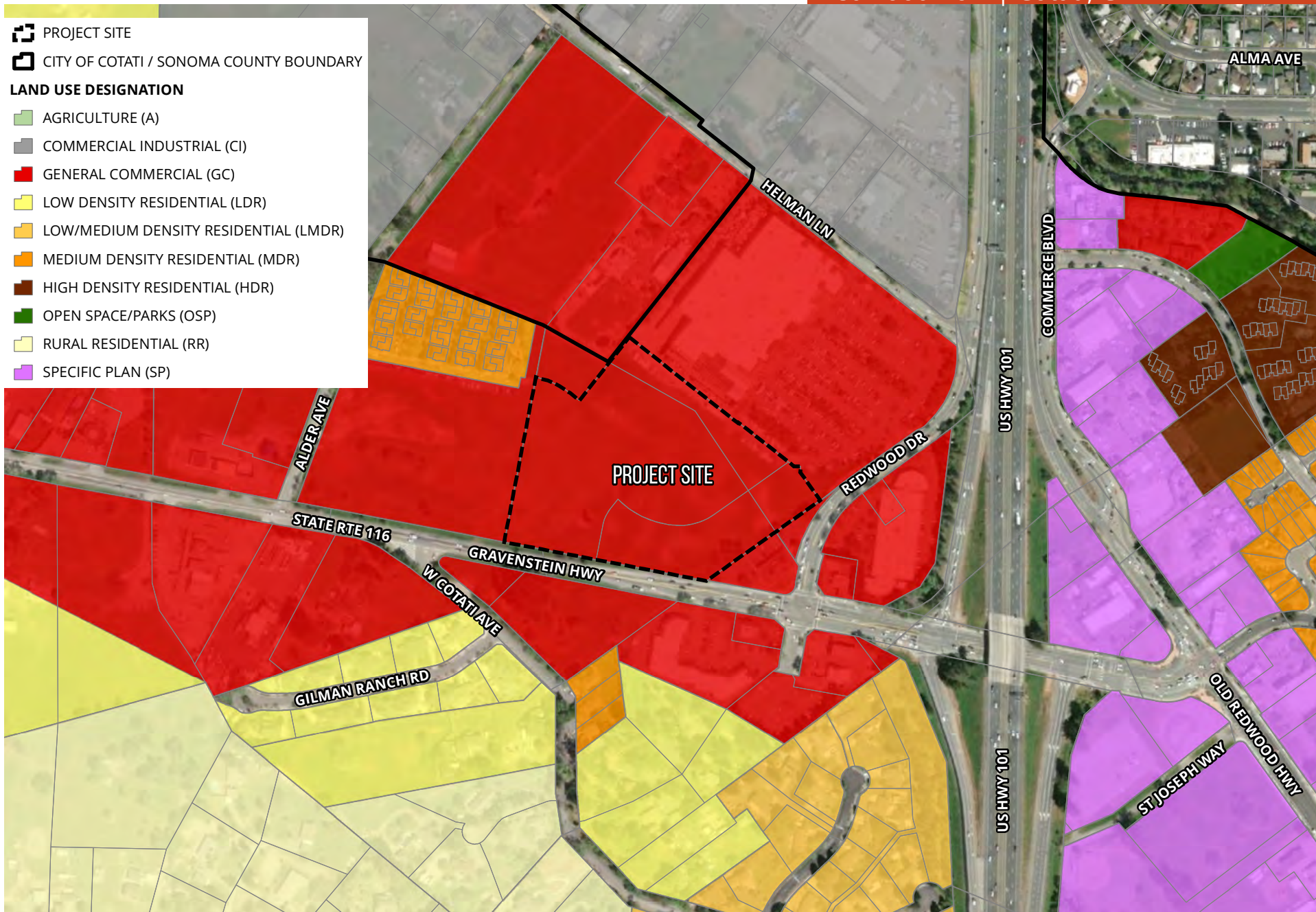
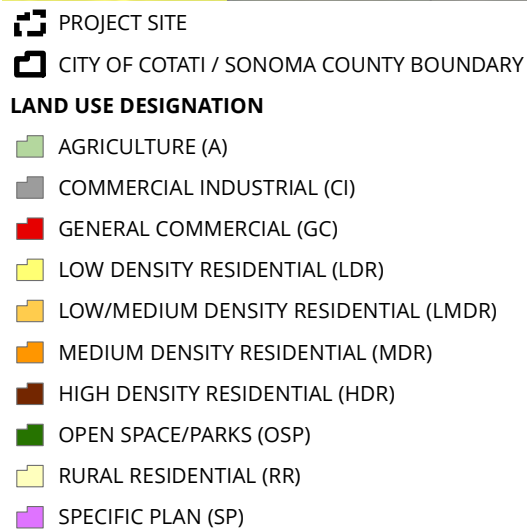


Figure 4: General Plan Land Use Map



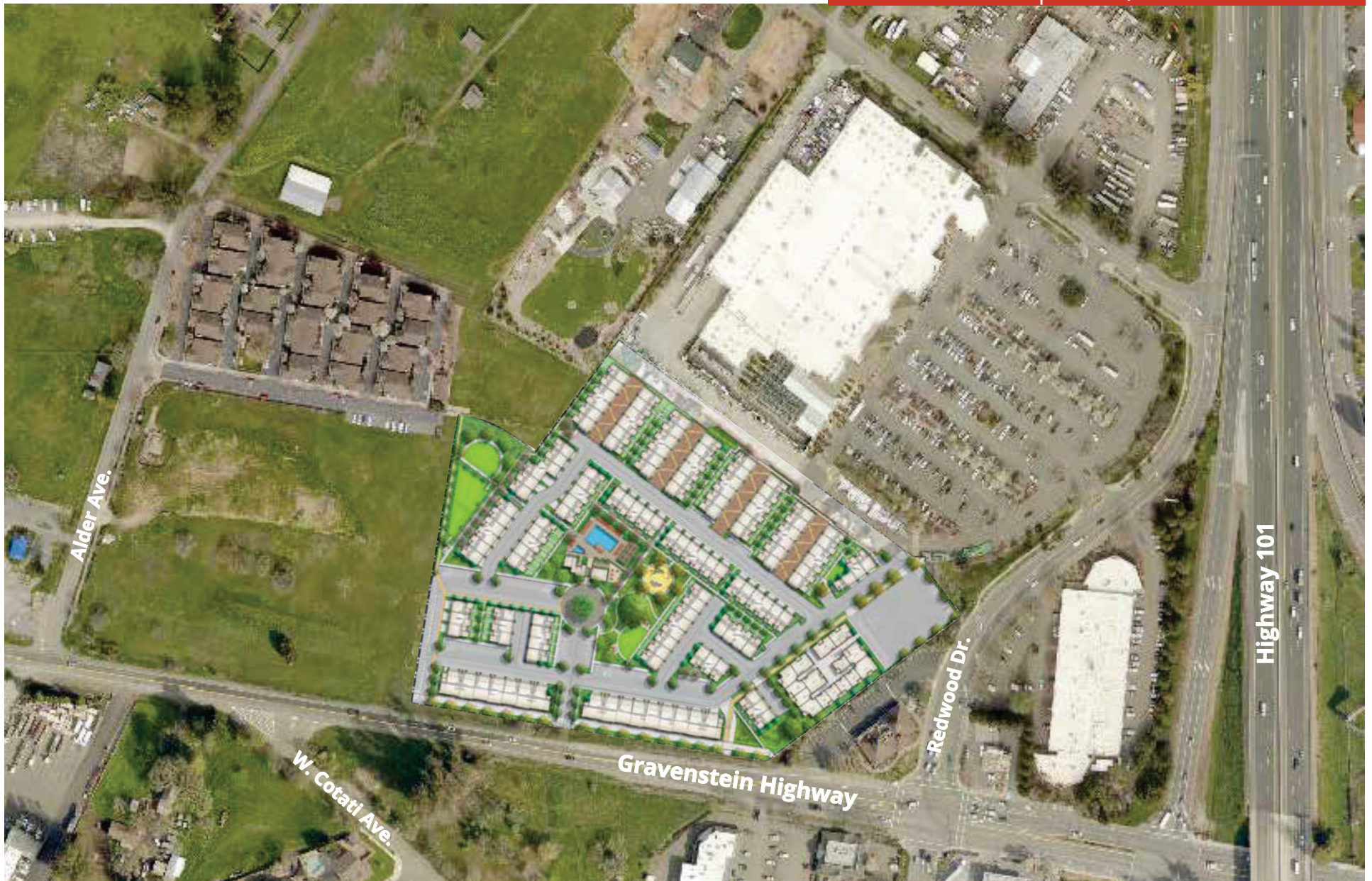


Figure 5: Site Plan

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3. RELEVANT CITY PLANNING DOCUMENTS

3.1. CITY OF COTATI GENERAL PLAN

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

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

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

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

3.2. CITY OF COTATI GENERAL PLAN EIR

The City of Cotati 2013 General Plan EIR (SCH No. 2013082037) was certified on March 24, 2015 by Resolution Number 2015-11 and for which an addendum was prepared for the 2023-2031 Housing Element in 2023. The 2013 General Plan EIR analyzed the following environmental resource topics: aesthetics and visual resources; air quality; biological resources; cultural resources; geology and soils; greenhouse gases and climate change; hazards; hydrology and water quality; land use, agriculture, and population; noise; public services and recreation; transportation and circulation; and utilities. The EIR analyzed two buildout scenarios. One evaluated maximum projected development within the City Limits, and the other evaluated the maximum projected development that could occur within the existing City Limits and the City's Sphere of Influence.

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

Aesthetics

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

Noise

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

Traffic

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

Utilities

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

Other

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

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

3.3. CITY OF COTATI ZONING CODE

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

The Project site is zoned Commercial, Gravenstein Corridor (CG), which permits a maximum residential density of 159 units at the Project site (15 units per acre). Through the application of the Density Bonus, the 178 proposed units (not including the 33 ADUs) complies with the City's Zoning Code. The 33 optional ADUs comply with the City's Zoning Code and State ADU law.

4. APPLICABLE CEQA PROVISIONS AND FINDINGS

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

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

4.1. GENERAL PLAN/COMMUNITY PLAN EXEMPTION (CEQA GUIDELINES SECTION 15183)

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

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

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

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

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

Section 15183(c) specifies that impacts which are not peculiar to the project site which have been addressed as a significant effect in the prior EIR or can be substantially mitigated by applying uniformly applied development standards and policies shall not require preparation of an additional EIR on the basis of that impact. As such, the project is required to implement all applicable mitigation measures set forth in the 2013 General Plan EIR to avoid, reduce, or offset environmental impacts. Section 7 of this CEQA Analysis identifies the relevant conditions of approval that will be required of the proposed project to demonstrate compliance with mitigation measures set forth in the program level EIR, and policies, programs and goals of the General Plan.

4.2. APPLICABILITY OF THE PROJECT TO CEQA GUIDELINES SECTION 15183

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

use designation and zoning for the site, and meets the streamlining provisions under CEQA Guidelines Section 15183(d)(1) as follows:

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

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

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

- Policy LU 1.4: Require new development to occur in a logical and orderly manner, focusing growth on infill locations and areas designated for urbanization on the Land Use Map (see Figure 7.1), and be subject to the ability to provide urban services, including paying for any needed extension of services.
- Action LU 1c: Prioritize the processing of development applications for infill, underutilized, or vacant parcels designated for urban uses over those projects requiring annexation.
- Policy LU 2.11: Continue to mix residential and commercial uses in appropriate areas, with an emphasis on providing mixed uses in the areas with Specific Plan land use designations.
- Policy LU 3.2: Encourage infill development of vacant lots within existing commercial districts and the core downtown/business areas and prioritize such development.
- Policy H-2.1: Ensure that adequate land designated for residential and/or mixed-use development is available to accommodate the City's fair share of ABAG's Regional Housing Needs Allocation (RHNA) and monitor on an annual basis to ensure continual compliance with State law.
- Policy H-2.2: Continue to require that residential development in the NU, NM, CG, and DSP zones meet the minimum density requirements identified in the Land Use Code, and report requests for reduced density on an annual basis.
- Policy H-2.7: Require housing developments to provide housing units at a range of affordability levels to assist in meeting the City's housing needs as required by Chapter 17.31 of the Land Use Code.
- Policy H-2.11: Encourage housing development on existing infill sites in order to efficiently utilize existing infrastructure.
- Policy H-3-2: Provide incentives for discretionary affordable housing development that address community priorities, including density bonuses, expedited processing, relaxation in development

standards through the use of concessions and incentives, and either reduction, delay, or waiver of fees when financially feasible.

- Policy H-3-3: Continue to provide density bonuses to eligible projects as required by Government Code Section 65915, including projects that meet the minimum amount of total units affordable to extremely low, very low and low income households or provide units restricted to occupancy for senior households.

4.3. CEQA DETERMINATION AND SUMMARY OF FINDINGS

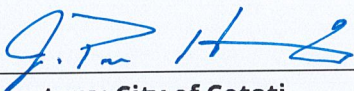
As summarized above and presented herein, the proposed project is eligible for the following CEQA provisions:

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


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

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

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


 Signature: City of Cotati

4/23/25
 Date


 Signature: Project Applicant

4/20/25
 Date

5. EVALUATION OF ENVIRONMENTAL EFFECTS

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

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

- **New Significant Impact** – The proposed project would result in a new significant impact that was not previously identified in the General Plan EIR.
- **Substantial Increase in Severity of Previously Identified Significant Impact in General Plan EIR** – The proposed project's specific impact would be substantially greater than the specific impact described in the General Plan EIR.
- **Substantial Change Relative to General Plan EIR** – The proposed Project would involve a substantial change from analysis conducted in the General Plan EIR.
- **Equal or Less Severity of Impact than Previously Identified in General Plan EIR** – The severity of the specific impact of the proposed project would be the same as or less than the severity of the specific impact described in the General Plan EIR.

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

- Peculiar to the project or project site (CEQA Guidelines Section 15183(b)(3));
- Not analyzed as significant impacts in the previous EIRs, including off-site and cumulative impacts (CEQA Guidelines Section 15183(b)(2));
- Due to substantial changes in the project (CEQA Guidelines Section 15162(a)(1));
- Due to substantial changes in circumstances under which the project will be undertaken (CEQA Guidelines Section 15162(a)(2)); or
- Due to substantial new information not known at the time the EIRs were certified (CEQA Guidelines Sections 15162(a)(3) and 15183(b)(4)).

Following the Checklist, a summary of the potential environmental impacts relevant to the proposed project that may result from the General Plan, as evaluated in the 2013 General Plan EIR, are described. Next, the potential project-specific environmental effects of the proposed project, including the project's consistency with the 2013 General Plan EIR, are discussed. Last, applicable General Plan EIR mitigation measures, as well as General Plan Objectives, Policies and Programs, are identified.

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

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

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

5.1. AESTHETICS

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

Sources: Redwood Row Project Plans dated November 11, 2024; Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; California Scenic Highway Mapping System Map updated Feb 16, 2021; Public Works/Engineering Conditions of Approval prepared on March 11, 2025; and City of Cotati Municipal Code.

2013 General Plan EIR Findings

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

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

- Impact 3.1-1: General Plan Implementation could result in Substantial Adverse Effects on Visual Character, including Scenic Vistas or Scenic Resources. General Plan Policies LU 1.4, LU 1.6, LU 1.8, LU 2.1, LU 2.2, LU 3.2, OS 1.1 - OS 1.15, CON 1.15 - CON 1.20 and Actions LU 1c, LU 1d, LU 2b, LU 2c, OS 1a – OS 1g, and CON 1I were identified as mitigating policies. However,

despite these measures, implementation of the General Plan would have a significant and unavoidable impact.

- Impact 3.1-2: General Plan Implementation could result in the Creation of New Sources of Nighttime Lighting and Daytime Glare. This impact is considered less than significant. Through the implementation of mitigating General Plan Policy OS 1.13 and Action OS 1f, implementation of the General Plan would have a less than significant impact.
- The City of Cotati adopted the Findings of Fact and Statement of Overriding Considerations on March 24, 2015, including for the significant and unavoidable impacts identified for Aesthetics and Visual Resources (Impact 3.1-1). The City findings determined that despite the significant and unavoidable impact to aesthetic resources, no other project alternative would meet the City's objective to realize the development potential of undeveloped lands for residential, office, and commercial uses necessary for housing opportunity and job growth.

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

The 2013 General Plan Final EIR (FEIR) determined that the implementation of the General Plan could result in substantial adverse effects on visual character, including impacts to scenic vistas or scenic resources and no feasible mitigation measures were available. The findings of the FEIR determined that there were mitigating policies included in the 2013 General Plan that would lessen the impacts, but that they would not reduce the impacts to less than significant. The City adopted a Statement of Overriding Considerations Finding that the benefits of the General Plan outweigh the significant and unavoidable impacts to aesthetic resources.

Project Consistency with the 2013 General Plan EIR

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

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

While the General Plan establishes policies and actions that are designed to reduce the impact on scenic quality and visual character, the Statement of Overriding Consideration acknowledged that the only method to completely avoid impacts on a citywide basis would be to severely limit the development potential of undeveloped lands that could support job growth and provision of housing

options. This was determined not to be consistent with the objectives of the 2013 General Plan to support a range of high-quality housing options and expand economic development and jobs-generating uses in the city. Therefore, the visual impact of implementing the General Plan was determined to be significant and unavoidable.

The Statements of Overriding Considerations adopted by the City recognized that the change in scenic resources and visual character from General Plan buildout would be unavoidable. Per the Statements of Overriding Considerations, "The introduction of new development into previously undisturbed areas may result in potentially significant impacts to scenic resources or result in the degradation of the Planning Area's visual character. Additionally, new development may result in changes to the skyline throughout the Planning Area, which may obstruct or interfere with views of the surrounding hillsides and the surrounding foothill areas."² Future projects developed under the General Plan would be required to be consistent with General Plan policies and actions, which aim to reduce visual impacts. However, the Statement of Overriding Considerations determined that "no feasible mitigation is available to fully reduce the cumulative effect on visual character, or to mitigate the proposed projects contribution to a less-than-significant level. Therefore, the proposed General Plan's contribution to this impact is considerable and the impact is significant and unavoidable."

The subject Project proposes development consistent with the General Plan land use designation, General Plan policies and actions, and development standards applicable to the site. The project proposes the development of 26 buildings containing 178 town homes with the potential for up to 33 ADUS, 44 affordable apartments, 10,032 square feet of gross commercial floor area on a site designated to accommodate such uses, as planned for by the General Plan and allowed in accordance with the State Density Bonus Law. The Project has been determined to be consistent with applicable policies of the General Plan and waiver/concessions provided through the State Density Bonus law, including development standards such as height limits, setbacks/build-to lines, and site coverage.

The Project's location along SR-116 would introduce new development on a vacant site that would partially obstruct views of surrounding hillsides from certain vantage points, particularly along streets adjacent to the site (e.g. Redwood Drive). However, potential impacts to scenic visual and the visual character have been considered in the 2013 General Plan FEIR and the Statement of Overriding considerations. This includes recognizing that development may change the skyline and obstruct or interfere with views of the surrounding hillsides and that there is no mitigation available to fully reduce impact on visual character. Furthermore, the project is subject to the City's Design Review process and findings, which is intended to ensure that the City's visual character and aesthetic quality is maintained. Therefore, the Project will not result in a substantial new or more severe impact to aesthetic resources relative to what was identified in the 2013 General Plan EIR.

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

The 2013 General Plan EIR, as shown on 2013 General Plan EIR Figure 3.1-1, determined there are no officially designated state scenic highways or highways eligible for a designation by the California Department of Transportation Scenic Highways Program within the City. The most recent CalTrans California State Scenic Highway Map designates SR-116 as eligible for designation as a scenic highway. However, the Project is located along a section of SR-116 within the urban growth boundary of the

² City of Cotati. Findings of Fact and Statement of Overriding Considerations for the 2013 Cotati General Plan Update. November 2014. Pages 27-28.

City of Cotati. It is surrounded by urban uses including established and approved commercial and residential development. The project will comply with required setbacks and the design includes landscaping and the planting of street trees along SR-116 for the length of the project frontage. Additionally, the project aims to preserve native oaks. Tree removal includes one Eucalyptus and up to two additional oak trees located along the project frontage. In accordance with **Environmental Condition of Approval (COA) BIO-4**, any trees removed will be in compliance with Municipal Code Chapter 17.54 and the conditions of the Tree Permit. As such, the project will not damage scenic resources within a designated state scenic highway. Accordingly, the Project will not result in a substantial new or more severe impact relative to what was identified in the 2013 General Plan EIR.

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

The Project is located on an undeveloped site surrounded by existing commercial development and residential uses, vacant parcels approved for future residential and mixed use development, roadways, and various sources of existing lighting including streetlights, buildings, and headlights from vehicles. The Project proposes outdoor lighting, consisting of new lighting for the access roads, woonerfs, driveways and parking areas, pedestrian areas, and building entries. The City's uniformly applied standards require lighting to have a shielded downward light source no taller than fourteen feet in height. A final lighting detail and design is required to be reviewed for compliance with Cotati Municipal Code Chapter 17.30.060 prior to issuance of the building permit and is imposed by **COA AES-1**. Additionally, as documented in the Public Works/Engineering Project Conditions Approval Memo, the project is required to comply with City Standard's for exterior lighting and final lighting plans shall be reviewed and approved by the City Engineer.

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

2013 General Plan EIR Mitigating Policies and Actions

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

Status: The project site has previously been graded as part of a prior development approval and remains undeveloped with a land use designation providing for commercial and residential uses in an area containing other existing and planned commercial and residential development. The project site is located within the city limits and annexation is not required. As such, the project complies with this policy.

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

Status: Assessment of views was provided through a viewshed analysis consisting of existing viewshed conditions and conceptual renderings viewed at the SR-116 and proposed project entry.³ The Project introduces new buildings that would obscure views to hillsides from certain locations, however the Project site is designated for development and the Project has been designed to meet applicable development standards within the municipal code regulating the size, scale, and setbacks and waivers/concessions thereto as provided in the State Density Bonus Law. As proposed, the Project complies with this policy.

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

Status: The proposed project will create a triangular park adjacent to the private park to the north of the project site that is located east of the Cotati Cottages. Additionally, the Project includes development of a multi-use path along SR-116 which will be separated from SR-116 by a 10-foot vegetated buffer and lined with trees. Further, to ensure lighting is in compliance with this action **COA AES-1** requires a final lighting plan be submitted prior to issuance of a building permit. As conditioned, the Project is consistent with this policy.

Conclusion and Environmental Conditions of Approval

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

AES-1: Prior to issuance of a building permit, the applicant shall submit a final lighting plan and the City shall verify that the final lighting plan complies with applicable requirements set forth in Section 17.30.060 of the Cotati Municipal Code, in accordance with General Plan Action OS1f to minimize off-site and night sky impacts of outdoor lighting.

³ Redwood Row Project Plans submitted by City Ventures dated November 14, 2024. Pages A0.1.1 and A0.3.

5.2. AGRICULTURAL AND FORESTRY RESOURCES

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; California Department of Conservation Farmland Mapping and Monitoring Program accessed on December 5, 2024; Sonoma County Permit Sonoma GIS, Williamson Act Contracts, 2019; and USGS Land Cover Classification System.

2013 General Plan EIR Findings

The City of Cotati 2013 General Plan EIR determined that approximately 36.42 acres of Farmland of Local Importance within the City limits may be converted to urbanized land uses upon full buildout of the General Plan. The 36.42 acres of Farmland of Local Importance are not under

Williamson Act Contract and represent less than nine percent of the total acreage of Important Farmlands within the Cotati Planning Area. Approximately 63.46 acres of land cover within the City of Cotati are used for agricultural purposes. The 2013 General Plan EIR concluded that with implementation of the policies and action items in the General Plan, impacts to agricultural and forestry resources would be less than significant. The following impacts to agriculture and forestry resources were considered under the 2013 General Plan EIR:

- Impact 3.9-3: Implementation of the General Plan would not result in the conversion of farmland, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. While implementation of the 2013 General Plan would result in the future urbanization of a small amount of Farmland of Local Importance, over 90 percent of the Important Farmlands within the Planning Area would be preserved and protected for ongoing viable agricultural use upon buildout of the General Plan. As such, this impact is considered less than significant.
- Impact 3.8-4: Implementation of the General Plan would not conflict with existing farmlands, agricultural zoning, or Williamson Act Contracts and would have a less than significant impact.
- The City of Cotati 2013 General Plan EIR determined that there are no lands within or adjacent to the city that are currently zoned as forest land, timber, or timber production. Therefore, implementation of the General Plan would have no impact on forest land, timber, or timber production.
- There is no agriculturally zoned land within City limits, and the 36.42 acres of Farmland of Local Importance may be converted to urbanized land uses, which are not under any Williamson Act Contract and represent less than nine percent of the total acreage of Important Farmlands evaluated within the Planning Area.

Project Consistency with the 2013 General Plan EIR

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

There are no farmland, agricultural lands, or forest lands onsite. The Project site was historically used for ranching activities and as horse pasture until the early 1990s. The site began to be affected by both onsite and offsite non-ranching activities in the late 1960s. During the 1970s and 1980s, improvements to SR-116 and surrounding flood control measures altered the existing topography, hydrology, and soil conditions of the project site. In 2003, the site was fully authorized for development by the City of Cotati and the state and federal resources agencies as part of the South Sonoma Business Park.⁴

The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to FMMP nor is it designated as forestland pursuant to Section 12220(g) of the Public Resources Code. In addition, the site is not zoned for agricultural use or designated as a Williamson Act contract. As such, impacts of the Project to agricultural resources will be equal or less severe than impacts identified in the 2013 General Plan EIR.

⁴ Biological Resources Analysis prepared by Monk and Associates on September 24, 2024.

2013 General Plan EIR Mitigating Policies and Actions

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

Conclusion

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

5.3. AIR QUALITY

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; BAAQMD 2017 Bay Area Clean Air Plan; BAAQMD CEQA Guidelines, April 2022; and Air Quality and Greenhouse Gas Assessment by Illingworth and Rodkin on December 20, 2024.

2013 General Plan EIR Findings

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

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

- Impact 3.2-3: Implementation of the General Plan would not create objectionable odors and would have a less than significant.
- Impact 3.2-4: Implementation of the General Plan would not conflict with Regional Plans and would have a less than significant.

National and State Regulations

The United States Environmental Protection Agency (EPA) sets nationwide emission standards for mobile sources that include on-road motor vehicles and non-road vehicles and equipment, which captures trucks and equipment used in construction. The EPA has established nationwide fuel standards, however the State may set motor vehicle emission standards and standards for fuel that are at least as stringent as national standards. In the past decade, the EPA has established numerous standards for heavy-diesel engines, which are a significant source of NO_x and particulate matter (PM₁₀ and PM_{2.5}). Diesel particulate matter (DPM) has been identified by the EPA as a probable carcinogen. Implementation of the standards are estimated to reduce particulate matter and NO_x emissions from diesel engines up to 95 percent in 2030, when the heavy-duty fleet is completely replaced by newer emission compliant vehicles. The EPA has also substantially reduced the amount of sulfur, a significant contributor to formation of particulate matter in diesel engine exhaust, allowed in diesel fuels. The federal diesel engine and diesel fuel requirements have been adopted by California, with modifications in some cases containing more stringent requirements or sooner implementation dates.

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

Bay Area Air Quality Management District

The City of Cotati is located within the San Francisco Bay Area air basin and regulated by the Bay Area Air Quality Management District (BAAQMD). The Bay Area Air Basin is designated as non-attainment for both the one-hour and eight-hour state ozone (O₃) standards, 0.09 parts per million (ppm) and 0.07 ppm, respectively. The Bay Area Air Basin is also in non-attainment for PM₁₀ and PM_{2.5} state standards, which require an annual arithmetic mean (AAM) of less than 20 µg/m³ for PM₁₀ and less than 12 µg/m³ for PM_{2.5}. In addition, the Basin is designated as non-attainment for the national 24-hour fine particulate matter (PM_{2.5}). All other national ambient air quality standards within the Bay Area Air Basin are in attainment.

The air quality analyses in the 2013 General Plan EIR relied on prior BAAQMD screening criteria and clean air plans. Since preparation of the 2013 General Plan EIR, the BAAQMD has adopted the 2017 Bay Area Clean Air Plan (CAP). On April 20, 2022, BAAQMD adopted new CEQA thresholds for determining the level of significance for a development project along with new screening criteria.

Local Regulation

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

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

Project Consistency with the 2013 General Plan EIR

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

The Bay Area meets all ambient air quality standards with the exception of ground-level ozone, respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}). In Sonoma County, measured levels of air pollutants are below air quality standards, including ozone, PM₁₀ and PM_{2.5}. High ozone levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NOx). These precursor pollutants react under certain meteorological conditions to form high ozone levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ozone levels. The highest ozone levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources. High ozone levels aggravate respiratory and cardiovascular diseases, reduced lung function, and increase coughing and chest discomfort.

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

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

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three quarters of the cancer risk from TACs (based on the Bay Area average). According to the California Air Resources Board (CARB), diesel exhaust is a complex mixture of gases, vapors and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the state's Proposition 65 or under the Federal Hazardous Air Pollutants programs.

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

An Air Quality and Greenhouse Gas Assessment was prepared by Illingworth and Rodkin, Inc. on December 20, 2024 using CalEEMod. The Air Quality analysis included 134 condominiums each with an individual garage (312,836 sf), 44 affordable apartment units (34,000 sf), commercial space (10,032 sf) and 90 parking spaces, which exceeds the actual number of proposed parking spaces (82).

The most recent and comprehensive air quality plan is the Bay Area 2017 Clean Air Plan. The primary goals of the Clean Air Plan are to attain air quality standards, reduce population exposure and protect public health, and reduce GHG emissions and protect the climate. The BAAQMD has also developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality and GHG impacts. In formulating compliance strategies, BAAQMD relies on the planned land uses identified in local general plans. Land use planning affects vehicle travel, which, in turn, affects region-wide emissions of air pollutants and GHGs. The plan includes CEQA Thresholds which are seen below in **Table 5.1**. These thresholds determine whether the project would have construction and operational emissions below the BAAQMD thresholds.

Table 5.1: Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
ROG	54	54	10
NOx	54	54	10
PM ₁₀	82 (Exhaust)	82	15
PM _{2.5}	54 (Exhaust)	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other BMP	Not Applicable	
Health Risks and Hazards	Single Sources Within 1,000-foot Zone of Influence	Combined Sources (Cumulative from all sources within 1,000-foot zone of influence)	
Excess Cancer Risk	>10 per one million	>100 per one million	
Hazard Index	>1.0	>10.0	
Incremental annual PM _{2.5}	>0.3 µg/m ³	>0.8 µg/m ³	
Greenhouse Gas Emissions			
Land Use Projects – (Must Include A or B)	A. Projects must include, at a minimum, the following project design elements:		
	1. Buildings		
	a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).		
	b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.		
	2. Transportation		

	<p>a. 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, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:</p> <ul style="list-style-type: none"> 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 <p>b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.</p> <p>B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).</p>
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Source: BAAQMD's April 2022 CEQA Air Quality Guidelines

Note: BMP = Best Management Practices, ROG = reactive organic gases, NO_x = nitrogen oxides, PM₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, PM_{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less.

The Project's Air Quality Assessment was conducted using the 2022 BAAQMD CEQA guidelines.

Construction Emissions

To estimate the emissions from construction of the Project and long-term operations, the California Emissions Estimator Model (CalEEMod) Version 2022 was used. CalEEMod is a statewide model designed to provide a uniform platform to quantify air quality emissions from land use projects, which allows for projection of emissions from on-site construction activity, construction vehicle trips, and evaporative emissions. Calculations of the Project's emissions were performed as part of the air quality and greenhouse gas assessment (**Appendix A**) and compared to thresholds of significance as established by BAAQMD.

The construction build-out scenario including equipment list and schedule, were based on project-specific information provided by the project applicant. On-site activities are primarily made up of construction equipment emissions, while offsite activities include worker, hauling, and vendor traffic. The construction schedule assumed that the earliest possible start date would be January 2025 and the project would be built out over a period of approximately 19 months, or 405 construction workdays. The earliest year of operation was assumed to be 2027. Average daily emissions were computed by dividing the total construction emissions by the number of active workdays. **Table 5.2** shows the average daily construction emissions of ROG, NO_x, PM₁₀ exhaust, and PM_{2.5} exhaust during construction of the project. As indicated in Table 5.2, predicted annualized project construction emissions would not exceed the BAAQMD significance thresholds during any year of construction.

Table 5.2 Construction Period Emissions

Year	ROG	NO _x	PM ₁₀	PM _{2.5}
Construction Emissions Per Year (Tons)				
2025	0.26	2.18	0.08	0.07
2026	2.59	0.68	0.02	0.02

Average Daily Construction Emissions Per Year (pounds/day)				
2025 (261 construction workdays)	1.99	16.72	0.62	0.57
2026 (144 construction workdays)	35.96	9.46	0.33	0.30
BAAQMD Threshold (pounds/day)	54	54	82	54
Exceed Threshold?	No	No	No	No

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM₁₀ and PM_{2.5}. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less-than-significant if best management practices are implemented to reduce these emissions. In compliance with the BAAQMD CEQA Guidelines and as required by General Plan Policy CON 2.5, **COA AQ-1** has been established to require the implementation of BAAQMD Best Management Practices to reduce fugitive dust emissions.

Operational Emissions

Operational air emissions from the project would be generated primarily from vehicles driven by future residents and employees. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are also typical emissions generated during operation from the Project's proposed uses.

The Air Quality Assessment, conservatively analyzed emissions from approximately 1,746 daily trips. When accounting for trip reduction adjustments that include internal capture, the trip rate entered into CalEEMod was 1,558 net daily trips. The operational emissions anticipated by the project are shown in **Table 5.3**. In addition to vehicle emissions, the operational emissions include emissions from electricity consumption, solid waste, and wastewater treatment associated with the project. Emission calculations assume 365 days of operation per year. As shown in **Table 5.3**, the operational period emissions would not exceed BAAQMD thresholds.

Table 5.3 Operational Emissions

Scenario	ROG	NOx	PM10	PM2.5
2027 Annual Project Operations Emissions (Tons/year)	2.81	1.04	1.58	0.41
<i>BAAQMD Thresholds (tons/year)</i>	<i>10</i>	<i>10</i>	<i>15</i>	<i>10</i>
2027 Daily Project Operational Emissions (lbs/day) ¹	15.40	5.67	8.63	2.26
<i>BAAQMD Thresholds (lbs/day)</i>	<i>54</i>	<i>54</i>	<i>82</i>	<i>54</i>
Exceed Thresholds?	No	No	No	No

The Project would not result in a significant increase in criteria air pollutants or conflict with a Clean Air Plan because, as conditioned, the Project would have construction and operational emissions below the BAAQMD thresholds, would be on an urban site planned for urban development, and would be located near employment centers, goods and services. Further, the proposed project supports the primary goals of the Clean Air Plan, which are protecting public health and protecting the Climate. Therefore, as conditioned, the Project will not result in a substantial new or more severe impact relative to what was identified in the 2013 General Plan EIR.

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

CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and parks. For cancer risk assessments, children are the most sensitive receptors, since they are more susceptible to cancer causing TACs. Residential locations are assumed to include infants and small children. The closest sensitive receptors to the site are the existing residents in the townhomes north of the project site, and other single-family homes in the surrounding area.

Project impacts related to increased health risk could occur by generating emissions of TACs and air pollutants. The Project would introduce new sources of TACs during construction from vehicle and equipment operation and during operation from new vehicle traffic consisting of mostly light-duty gasoline-powered vehicles, which would produce TAC and air pollutant emissions.

Impacts to existing sensitive receptors were addressed for temporary construction activities as well as long-term operations. The Project site is exposed to several sources of existing TACs and localized air pollutants in the vicinity of the project. The impact of the existing sources of TACs was assessed in terms of the cumulative risk which includes the project contribution, as well as the risk on the new sensitive receptors introduced by the project.

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

Health risk impacts were evaluated by predicting increased cancer risk, the increase in annual PM_{2.5} concentrations, and computing the Hazard Index (HI) for non-cancer health risks. The risk impacts from the project are the combination of risk from construction and operation sources. These sources include on-site construction activity, construction truck hauling, and increased traffic from the project. To evaluate the increased cancer risks from the project, a 30-year exposure period was used, per BAAQMD guidance, with the sensitive receptors being exposed to both project construction and operation emissions during this timeframe.

The project increased cancer risk is computed by summing the project construction cancer risk and operation cancer risk contribution. Unlike the increased maximum cancer risk, the annual PM_{2.5} concentration, and HI values are not additive but based on an annual maximum value for the entirety of the project. The project maximally exposed individual (MEI) is identified as the sensitive receptor that is most impacted by the project's construction and operation. The nearby existing residences surrounding the project site and the future Cotati Village #1 residences, as shown in Figure 6. Residential receptors are assumed to include all receptor groups (e.g., third trimester, infants, children, and adults) with almost continuous exposure to project emissions. While there are additional

sensitive receptors within 1,000 feet of the project site, the receptors chosen are adequate to identify maximum impacts from the project.

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

Project Level Thresholds of Significance

- Increase cancer risk greater than 10 in a million
- Increased hazard greater than 1 (chronic or acute)
- Increase PM_{2.5} greater than 0.3 µg/m³ annual average

Cumulative Thresholds of Significance

- Cancer risk greater than 100 in a million (from all local sources)
- Hazard greater than 10 (chronic from all local sources)
- PM_{2.5} greater than 0.8 µg/m³ annual average

Potential impacts were evaluated for construction and operation of the Project. Nearby sensitive receptors and the maximum exposed individual receptor (MEI) are shown in **Figure 6**. It is assumed that the approved Cotati Village 1 Project will be constructed prior to the construction of this project. As such, the future units are considered in the identification of the nearest unit and the MEI. In the event that Cotati Village 1 is not built prior to Redwood Row, the Cotati Cottages located northwest of the Project site would be the nearest MEI, but as that would be farther than the nearest unit proposed for Cotati Village 1, the impacts on the nearest unit of the Cotati Cottages would be less than the impacts on the MEI identified because it would be farther away. Therefore, using the units in Cotati Village 1 as the MEI is a more conservative estimate than using the existing units in the Cotati Cottages.

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



Source: Air Quality & Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, December 20, 2024.

Project Construction

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

Concentrations were calculated at nearby residential receptors at receptor heights of 1.5 meters (5 feet above ground) and 4.5 meters (15 feet above ground), representative of the breathing heights of residents in first and second floor levels. Construction was assumed to occur for 9 hours per day (8:00am – 5:00pm). The MEI most affected by construction cancer risk was located on the second floor (15 feet above ground) of an approved (not yet constructed) residence on the Cotati Village #1 project site. The MEI for annual $PM_{2.5}$ concentration was identified in the same location but on the first floor (5 feet). Project risk impacts are shown in **Table 5.4**.

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

Source		Cancer Risk (per million)	Annual PM _{2.5} (µg/m ³)	Hazard Index
Project Construction Impacts				
Project Construction (Years 0 - 2)	Unmitigated	5.68 (infant)	0.06	0.01
BAAQMD Single-Source Threshold		10	0.3	1.0
Exceed Threshold?	Unmitigated	No	No	No

Source: Air Quality & Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, December 20, 2024.

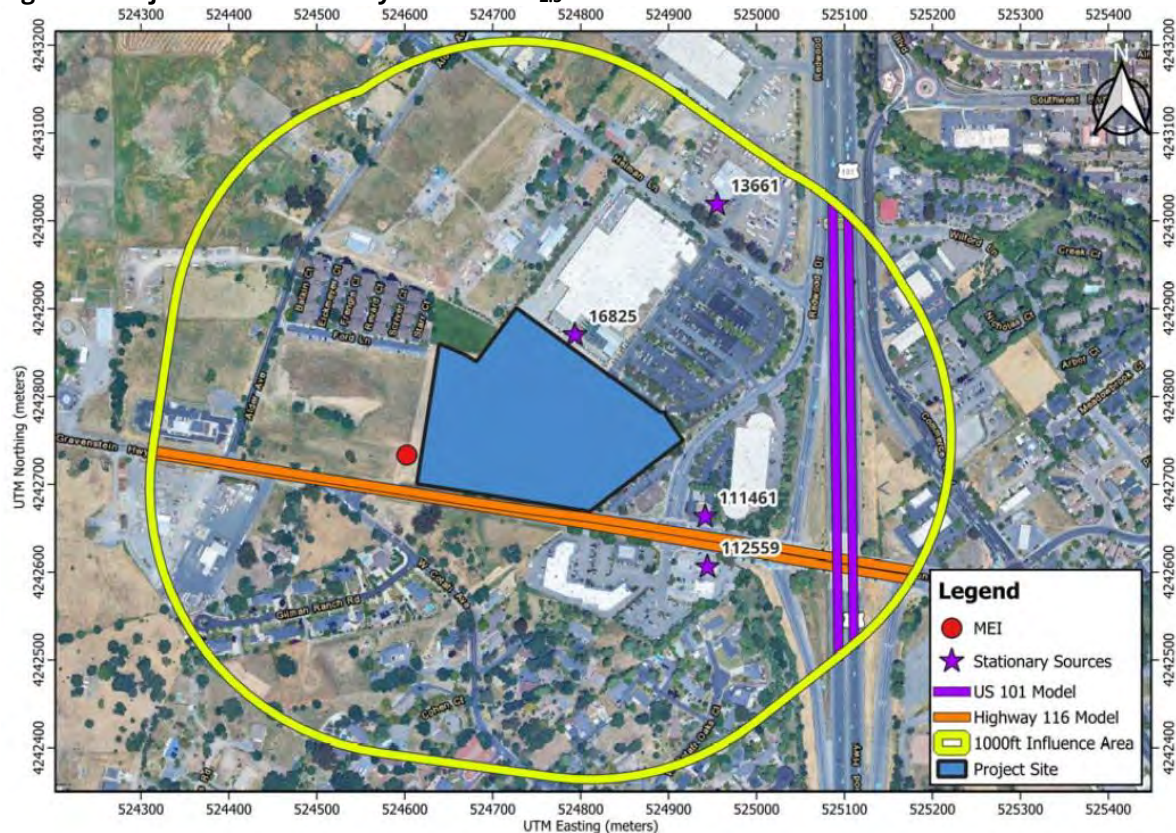
The predicted HI values from project construction activities at the MEI location would not exceed the threshold. The uncontrolled maximum cancer risks and annual PM_{2.5} concentration would not exceed their respective single-source significance thresholds. Therefore, there would be no significant impact in terms of increased cancer risk and PM_{2.5} concentrations.

Operational Emissions

The typical operations of the Project as a residential development are expected to generate long-term emissions from mobile sources (i.e., traffic); However, emissions from operation of the residential use are considered to have a negligible health risk impact.

Cumulative Health Risks of All TAC Sources at the Off-Site Project MEIs

The cumulative health risk assessment included all substantial sources of TACs that can affect sensitive receptors located within 1,000 feet of the project site including Highway 101, State Route 116, and five stationary sources of TACs. The TAC and PM_{2.5} sources within 1,000 feet of the project are shown in Figure 7 below.

Figure 7: Project Site and Nearby TAC and PM_{2.5} Sources

Source: Air Quality & Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, December 20, 2024.

As the project MEIs are located near U.S. 101 and SR-116, a refined analysis of the impacts of TACs and PM_{2.5} to the MEI receptors is necessary to evaluate potential cancer risks and PM_{2.5} concentrations from both highways. A review of the traffic information reported by Caltrans indicated that U.S. 101 traffic included 108,000 vehicles per day (based on an annual average) that are about 5.71 percent trucks, of which 3.4 percent are considered diesel heavy duty trucks and 2.3 percent are medium duty trucks. The same Caltrans data indicated that SR-116 traffic included 23,600 vehicles per day (based on an annual average) that are about 6.66 percent trucks, of which 3.4 percent are considered diesel heavy duty trucks and 3.2 percent are medium duty trucks.

To estimate TAC and PM_{2.5} emissions over the 30-year exposure period used for calculating the increased cancer risks for sensitive receptors at the MEIs, the CT-EMFAC2021 model was used to develop vehicle emission factors for the year 2025 (construction start year). Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates utilized by CT-EMFAC2021. Year 2025 emissions were conservatively assumed as being representative of future conditions over the time period that cancer risks are evaluated since, overall vehicle emissions, and in particular diesel truck emissions, will decrease in the future. Dispersion modeling of TAC and PM_{2.5} emissions was conducted using the EPA ISCST3 air quality dispersion model.

The cumulative impacts analysis assumes that Cotati Village 1 will not be under construction at the same time as the Project. The Air Quality and Greenhouse Gas Assessment prepared by Illingworth and Rodkin assume that Cotati Village 1 will be completed and occupied prior to construction of the Project. However, current estimates from the owners of Cotati Village 1 have indicated that they do not anticipate beginning construction for at least five years. While this would change whether sensitive receptors are on the Cotati Village 1 site, it still would not result in overlapping construction because the Redwood Row Project would be completed and operating prior to construction commencing on Cotati Village 1.

The cumulative health risk impacts at the location of the MEI are shown in Table 5.5. They include Highway 101, SR-116, an automotive repair facility, an [emergency] generator, and two gas stations.

Table 5.5: Cumulative Health Risk Impacts at the Location of the Project MEIs (Off-Site)

Source	Cancer Risk (per million)	Annual PM _{2.5} (µg/m ³)	Hazard Index
U.S. 101, ADT: 111,239	1.27	0.02	<0.01
SR-116, ADT: 24,408	3.70	0.16	<0.01
Nor-Cal Truckbods (Facility ID #13661, Automotive Repair), MEIs at 1000+ feet.	0.00	0.00	0.00
Lowe's HIW Inc #1901 (Facility ID # 16825, Generator), MEIs at 650 feet.	0.88	<0.01	0.00
Save On Gas Inc. dba Cotati Gas Mart (Facility ID #111461, Gas Dispensing Facility), MEIs at 1000+ feet	1.00	0.00	0.03
APRO LLC dba United Pacific #5426 (Facility ID #112559, Gas Dispensing Facility), MEIs at 1000+ feet.	0.22	0.00	0.01
<i>Combined Sources Unmitigated</i>	<i>12.75</i>	<i><0.25</i>	<i><0.07</i>
BAAQMD Cumulative Source Threshold	100	0.8	10.0
<i>Exceed Threshold? Unmitigated</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: Air Quality & Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, December 20, 2024.

As shown in the table above, the Project will not have cumulative impacts that exceed the BAAQMD and will not result in a new significant impact or increase the severity of an impact identified in the General Plan EIR.

Operational On-Site Health Risk Assessment for TAC Sources

The BAAQMD CEQA Air Quality Guidelines recommend that proposed projects that include sensitive receptors address the potential health risk impacts of nearby sources. In compliance with BAAQMD CEQA Guidelines and General Plan Policy CON 2.2, a health risk assessment was completed to assess

any potential land use conflicts that the existing TAC sources would have on the new proposed sensitive receptors (i.e., residents) introduced by the project.

The cumulative sources of TACs assessed include Highway 101 and SR-116, stationary sources (see Table 5.6), and construction impacts from Cotati Village 1.

Table 5.6: Cumulative Health Risk Impacts Upon the On-Site Sensitive Receptors

Source	Cancer Risk (per million)	Annual PM_{2.5} (µg/m³)	Hazard Index
U.S. 101, ADT: 113,399	3.36	0.06	<0.01
SR-116, ADT: 24,780	4.81	0.20	<0.01
Cotati Village #1 Controlled Construction Impacts	4.50	0.11	<0.01
Nor-Cal Truckbodies (Facility ID #13661, Automotive Repair), MEIs at 1000+ feet.	0.00	0.00	0.00
Lowe's HIW Inc #1901 (Facility ID # 16825, Generator), MEIs at 650 feet.	9.78	0.01	<0.01
Save On Gas Inc. dba Cotati Gas Mart (Facility ID #111461, Gas Dispensing Facility), MEIs at 1000+ feet	7.17	0.00	<0.01
APRO LLC dba United Pacific #5426 (Facility ID #112559, Gas Dispensing Facility), MEIs at 1000+ feet.	2.37	0.00	0.47
BAAQMD Single-Source Threshold	<i>10</i>	<i>0.3</i>	<i>1.0</i>
Exceed Threshold?	<i>No</i>	<i>No</i>	<i>No</i>
Cumulative Total	<i>31.99</i>	<i>0.38</i>	<i>0.95</i>
BAAQMD Cumulative Source Threshold	100	0.8	10.0
<i>Exceed Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>

As shown in Table 5.6, the existing sources of TAC emissions do not exceed the BAAQMD single-source or cumulative-source thresholds for cancer risk, annual PM_{2.5} concentration, or HI. Therefore, potential impacts would be less than significant.

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

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

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

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

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

2013 General Plan EIR Mitigating Policies and Actions

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

Status: The Project is located on a vacant site planned for high density multifamily residential units and commercial space for a mixed-use and compact development plan. Housing would be located above and near commercial uses onsite as well as in proximity to the site. The Project encourages alternative transportation options by including construction of a Class I multi-use path along the SR-116 frontage, incorporating bicycle parking onsite as conditioned, and introducing higher density residential uses in proximity to existing bus stops within a quarter mile of the site. The Project would be subject to **COA AQ-1** to minimize air quality emissions during construction activities. As such, the project is consistent with this policy.

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

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

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

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

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

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

Policy CI 1.19: Require new development to include effective linkages to the surrounding circulation system for all modes of travel, to the extent feasible.

Status: The Project includes the development of a Class I multiuse path at the SR-116 frontage, which extends the pedestrian and bicycle circulation facilities available around the site. The site also incorporates an internal network of pedestrian pathways. As such, the project is consistent with this policy.

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

- Air pollutant emissions associated with the project during construction, project operation, and cumulative conditions.
- Potential exposure of sensitive receptors to toxic air contaminants.
- Significant air quality impacts associated with the project for construction, project operation, and cumulative conditions.
- Mitigation measures to reduce significant impacts to less than significant or the maximum extent feasible where impacts cannot be mitigated to less than significant.

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

Conclusion and Environmental Conditions of Approval

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

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

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).

5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
7. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
8. Unpaved roads providing access to or on the site located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted wood chips, mulch, or gravel.
9. Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

5.4. BIOLOGICAL RESOURCES

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Final Santa Rosa Plain Conservation Strategy, 2005, USFWS; Recovery Plan for the Santa Rosa Plain, 2016, USFWS; Reinitiation of Formal Consultation on Issuance of Clean Water Act, Section 404 Permits by the U.S. Army Corps of Engineers (Corps) on the Santa Rosa Plain, Sonoma County, California, 2020, USFWS; Biological Resources Analysis Redwood Row Project prepared by Monk & Associates September 24, 2024; Highway 116 and West Cotati Avenue Project Aquatic Resources Delineation Map prepared by Monk & Associates on August 23, 2023; and Highway 116 and West Cotati Avenue Project Biological Resource Assessment prepared by Monk and Associates October 26, 2023.

2013 General Plan EIR Findings

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

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

- Impact 3.3-1: Implementation of the General Plan Update could result in direct and indirect loss of habitat and individuals of endangered, threatened, rare, proposed, and candidate plant and wildlife species, plant species identified by the California Native Plant Society with a rating of List 1A or 1B (i.e., rare, threatened, or endangered plants) as well as animal and plant species of concern and other non-listed special status species. This would be a less than significant impact with identified policies including Policy CON 1.1, CON 1.2, CON.
- Impact 3.3-2: Implementation of the General Plan Update has the potential to result in significant impacts to sensitive natural communities including riparian habitat, however the implementation of the policies and action measures of the General Plan, as well as adherence to state and federal regulations, would reduce these impacts to less than significant.
- Impact 3.3-3: Implementation of the General Plan Update has the potential to result in significant impacts to protected waters, however the implementation of the policies and action measures of the General Plan, as well as adherence to state and federal regulations, would reduce these impacts to less than significant.
- Impact 3.3-4: Implementation of the General Plan Update could interfere substantially with the movement of native resident or migratory fish or wildlife species. This would be a less than significant impact with incorporation of General Plan policies and actions items.
- Impact 3.3-5: Implementation of the General Plan Update would support the existing Tree Preservation and Protection Ordinance through its policies and will not conflict with the Ordinance or with the policies that the General Plan contains that pertain to protecting biological resources. Implementation of the policies and action measures in the General Plan would ensure consistency with established ordinances and therefore the Project's impact is less than significant.

- Impact 3.3-6: Implementation of the General Plan Update would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans as there are none that have been adopted or are applicable to the General Plan. The General Plan would have a less than significant impact relative to this topic.

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

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

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

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

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

The Recovery Plan for the Santa Rosa Plain was released by the United States Fish and Wildlife Service (USFWS) in June 2016 and provides a framework for the recovery of listed species. Subsequently, in 2020, the USFWS published the reinitiation of formal consultation on issuance of Section 404 of the Clean Water Act for the Santa Rosa Plain. The reinitiation of the Biological Opinion analyzes the impacts to critical habitat as it relates to development in the Santa Rosa Plain. As noted therein, development in the Santa Rosa Plain would result in the filling of wetlands and removal of upland habitat, resulting in the loss of critical habitat for California Tiger Salamander (CTS) as well as Burke's Goldfield, Sebastopol Meadowfoam, and Sonoma Sunshine. To address these impacts, the Corps provides several minimization measures and best management practices for each species including updates to measures identified in the 2005 Conservation Strategy and 2007 Biological Opinion to reflect current knowledge and more effectively minimize adverse impacts of development within the Santa Rosa Plain.

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

Project Consistency with the 2013 General Plan EIR

The Project site was originally the southeastern part of the South Sonoma Business Park Master Plan Project area. A portion of the South Sonoma Business Park Master Plan area has been developed with the Lowe's Home Improvement Store and the Cotati Cottages subdivision. The Project site is a vacant lot, that was historically used for grazing and horse pasture. As part of the South Sonoma Business Park project and in accordance with an approved stockpile and drainage plan (State Water Resources Control Board Facility ID: 1_49C337161) approximately 10,000 cubic yards of clean fill was placed on the site. To date, the site remains vacant but has been actively maintained by the landowner.

Additionally, the site is within the South Sonoma Business Park Assessment District (SSBPAD) which was created to finance the required mitigation for the development of the SSBP project site. The costs also included the establishment of a maintenance fund and a permanent capital endowment with CDFW for the operation and maintenance of the SSBP wetlands mitigation and California tiger salamander replacement habitat. The property owner has made annual payments to the assessment district. The owners of the Redwood Row property have paid \$2,722,208.14 to date and expect to pay approximately \$1,027,000.00 in future payments until full maturity in 2033.

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

In accordance with Action CON 1a, a Biological Resources Analysis was prepared by Monk and Associates on September 24, 2024 (**Appendix B**) to document the existing biological resource conditions on the site and to analyze potential impacts to biological resources. Monk & Associates biologists have conducted surveys on the project site off and on over a period of 15 years as part of their studies related to the SSBP, with most recent surveys occurring in January 2022, January 23, 2024, February 28, 2024, March 13, 2024, April 8, 2024, and on April 30, 2024.

Monk & Associates biologists concluded that although the site has not been developed, it has been actively managed over the past 20+ years to facilitate site drainage and for fire control; annual disking and mowing have been part of the management regime. The overall topography of the project site is relatively flat, with the long-term soil stockpile forming the only significant hillslope in the northwestern corner of the project site. There is also a slightly elevated area in the southeast portion of the project site, gently sloping down to the northeast and directing stormwater flows offsite to the northeast. Due to mass grading of the project site in 2002 and the annual maintenance (disking) of the project site since then, there are only two remaining plant communities onsite: ruderal herbaceous, and seasonal/constructed wetlands.

Almost all vegetation within the project site consists of non-native, ruderal herbaceous grasses and forbs (i.e., broad-leaved plants) though there are several valley oak trees (*Quercus lobata*) lining parts

of the southern and eastern borders, with a prominent valley oak and Eucalyptus standing in the middle of the site. Dominant vegetation includes wild oat (*Avena barbata*), Italian rye grass (*Festuca perennis*), Mediterranean barley (*Hordeum marinum gussoneanum*), and bur medic (*Medicago polymorpha*). Owing to the excessively disturbed and unnatural conditions found at the project site, special-status plants would not likely occur.

Special Status Plant Species

The Santa Rosa Plain is known to support three federal and state listed vernal pool plant species: Sonoma sunshine (*Blennosperma bakeri*), Burke's goldfields (*Lasthenia burkei*), and Sebastopol meadowfoam (*Limnanthes vinculans*). The Project site is outside the expected range of the Core Management Area for both the Burke's goldfields and Sebastopol meadowfoam. Neither Sonoma sunshine nor Burke's goldfields have ever been observed on the project site.

The project site is located at the southern boundary of the "Core Area" for the federally and State-listed Sebastopol meadowfoam and was formerly found on the SSBP project site prior to its mass grading. This is CNDDDB Occurrence No. 35 (M&A is listed as one of the sources) which documents 30 plants observed in 1997 in the area that has since been developed into townhomes; accordingly, this record is now listed as being extirpated by development. In compliance with the Corps' Individual Permit which incorporated USFWS' Biological Opinion, the waiver of water quality from the RWQCB, a 2081 Agreement with CDFW, and with a grading permit issued by the City of Cotati, in June of 2002 the SSBP applicant graded 100 percent of the 34-acre project site (which includes the 10.6-acre Redwood Row Project Site) removing all Corps' jurisdictional features, and all of the 0.12 acre of Sebastopol meadowfoam habitat on the project site.

The project site was mass graded, and all wetlands were filled in 2002 and there is no longer Sebastopol meadowfoam habitat onsite. During surveys conducted on the project site between March and May of 2024, no special status plants were identified. The existing seasonal wetlands that remain on the project site were constructed to facilitate site drainage and are heavily degraded; therefore, these features do not provide suitable habitat for vernal pool plant species, specifically Sebastopol meadowfoam. Regardless, all Sebastopol meadowfoam impacts were previously mitigated for, as approved by the CDFW and the USFWS and no new impacts would occur to special status plant species as a result of the proposed project.

Nesting Birds

Passerine birds (songbirds) and raptors (i.e., birds of prey), their active nests, eggs, and young are protected under California Fish and Game Code (§3503 and §3503.5). Thus, prior to any tree removal or earthwork that would be conducted during the nesting season (February 1 through September 1) that could disturb nesting birds (for example, ground vibrations from grading equipment cause some birds to abandon their nests). In order to ensure that the project does not affect nesting birds, **COA BIO-1** has been established and requires that preconstruction nesting bird surveys be conducted within 7 days prior to any proposed ground disturbance or vegetation removal. **COA BIO-1** includes required actions that must be taken in the event that active bird nests are identified onsite. Through the implementation of **COA BIO-1**, the project would not result in new or additional impacts to nesting birds.

Special Status Animal Species

A total of 11 special-status animal species are known to occur in the region of the project site. One special-status animal was historically known from the SSBP project site: California tiger salamander (*Ambystoma californiense*). This record is prior to the site's mass grading back in 2002. Due to the project site being mass graded, the residential and commercial development surrounding the project site, and the traffic along SR-116, it is very unlikely that any special-status animal currently resides on the project site. However, the project could result in impacts to the American badger (*Taxidea taxus*), the California tiger salamander, and nesting birds.

California Tiger Salamander

The project site is located within the known range of the Sonoma County "Distinct Population Segment" (DPS) of the California tiger salamander (CTS). Under the FESA, the USFWS emergency listed the Sonoma County DPS as endangered on July 22, 2002. The USFWS formalized the listing of the Sonoma County DPS of the California tiger salamander as endangered on March 19, 2003 (USFWS 2003b). The USFWS determined that this population is significantly and immediately imperiled by a variety of threats including habitat destruction, degradation, and fragmentation due to urban development, road construction, pesticide drift, collection, and inadequate regulatory mechanisms.

CTS occur in grasslands and open oak woodlands that provide suitable over-summering and/or breeding habitats. CTS spend most their lives underground. They typically only emerge from their subterranean refugia for a few nights each year during the rainy season to migrate to breeding ponds which can be up to 1.5 miles away.

There is a known CNDDDB record of this species (Occurrence #12; M&A record) on the SSBP project site of which this 10-acre project site is a part of. This occurrence documents three larvae found in a vernal pool on the project site during surveys conducted in April 1995. CTS was last observed on the SSBP project site in April 2002 when larvae were salvaged from their breeding pool prior to permitted mass grading. All the SSBP wetlands were filled, and the entire site was mass graded in June 2002 under appropriate permits issued by the City (grading permit), the CDFW, the USFWS, the Corps, and the RWQCB.

The SSBP developer was also required by the USFWS and CDFW to salvage California tiger salamanders presumed to be migrating from adjacent properties to the former (now developed) breeding pools on the South Sonoma Business Park project site. This salvage was conducted under the assumption that all adult CTS and their breeding habitat had been removed from the South Sonoma Business Park project site when it was mass graded in June 2002. The recovery/salvage project was implemented under the expectation that the balance of the South Sonoma Business Park and the parcel to the north (then called the Nibe project site and now known as the Cotati Cottages) and the west (then called the Reds project site and now known as the Cotati Village 2 project) would be developed under a master development project. There are no extant potential breeding pools within 1.3 miles of the project site and no confirmed breeding habitat in the vicinity of the project site since the only two confirmed breeding habitats were filled over 20 years ago.

The created drainage features on the site are not inundated long enough to support breeding by CTS and as such, there is no wetland on the project site that is deep enough or that has sufficient ponding duration to support breeding California tiger salamanders to metamorphosis. Additionally, there is no suitable upland over-summering habitat for CTS onsite.

As documented in the Biological Resources Analysis, CDFW has confirmed that no additional mitigation would be required for the Redwood Row project since all mitigation for the project's effects

on Sebastopol meadowfoam and the CTS was completed in 2002. As such, the project would not result in new impacts and all prior impacts to CTS have been fully mitigated.

American Badger

The American badger is a California “species of special concern” found in a variety of habitats, especially in open habitats such as oak-savannah and grasslands where its presence is typically identified by its distinctive, large underground dens(burrows) excavated in friable (loose) soils.

There are four CNDDDB records of American badger within 3 miles of the project site. However, due to the extensive commercial and residential development surrounding the project site, heavy traffic along , and the long history of annual disking onsite for fire control, the project site contains marginal (at best) foraging habitat for this species. While it is unlikely that development of the project could result in impacts to American badgers, in an abundance of caution and to ensure that there are no additional impacts to this California species of special concern, **COA BIO-2** has been established and requires preconstruction surveys for American badger prior to site preparation and/or grading. As conditioned, the project will have no effects on the American badger.

Seasonal Wetlands

The Project site was graded in June 2002 with an approved stockpile and drainage plan which included placement of approximately 10,000 cubic yards of clean fill on the site in accordance with the City's approved stockpile and drainage plan (permit numbers 25090, 25154, 25027) and the creation of artificial drainage swales on the property, but the site was not developed at that time. These swales remain onsite and are dominated by Italian rye grass (*Festuca perennis*) and annual semaphore grass (*Pleuropogon californicus* var. *californicus*).

During a wetland delineation conducted in August 2022, a total of roughly 0.27 acre of seasonal wetlands (five seasonal swales) were mapped on the Redwood Row project site. These five seasonal wetlands are artificial ditches related to interim construction measures and upland drainage maintenance of the property that has been ongoing since 2002. They were created to drain the project site and reduce ponding related to the previous mass grading and stockpiling of the project site. These wetlands cover 0.27 acre of the project site and are considered to be “construction-related features” and do not fall under the Corps’ jurisdiction pursuant to Section 404 of the Clean Water Act. However, the California Regional Water Quality Control Board (RWQCB) has stated that these construction-related features may fall under this agency’s jurisdiction pursuant to the Porter-Cologne Water Quality Control Act.

Further, the project will be required to construct public improvements along SR-116. A separate delineation for the frontage improvements was completed by Monk and Associates on June 19, 2023. No Waters of the United States were identified in the delineation. However, the required frontage improvements and development of the entrance from SR-116 would result in impacts to 1,661sf (0.038 acres) of isolated wetlands/roadside ditch and a 62 foot long/124 sf (~0.003 acre) isolated other water/roadside ditch which are considered “waters of the State” and regulated by the State and Regional Water Quality Control Board.⁵ In order to comply with the State permitting requirements and the City of Cotati General Plan Action CON 1a, **COA BIO-3** has been imposed to minimize and offset

⁵ Draft Aquatic Resources Delineation Map, Biological Resource Analysis for Highway 116/West Cotati Realignment Plan prepared by Monk and Associates on October 26, 2023.

impacts to the regulated waters of the state and isolated seasonal wetlands that will be impacted by the project.

In further compliance with the State permitting requirements and the City of Cotati General Plan Action CON 1a, **COA HYD-1** is imposed to require a Stormwater Pollution Prevention Plan (SWPPP) for review and approval by the City Engineer prior to issuance of grading permit. Further, **COA HYD-2** requires the development and implementation of a Stormwater Control Plan (SCP) which includes post construction BMPs. Through the implementation of the SWPPP and the SCP, the Project will comply with the requirements of the Porter-Cologne Water Quality Control Act and will not result in additional impacts to waters of the state.

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

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

The 2013 General Plan EIR determined that implementation of the General Plan could interfere with movement of native resident or migratory fish or wildlife species and those impacts would be less than significant. The Biological Resources Analysis prepared by Monk and Associates for the project site concluded that the proposed project will not interfere with the movement of native wildlife.

The project site has no aquatic features such as a stream or river that would serve as a wildlife movement corridor. Similarly, due to the site's setting within a developed landscape, the site exhibits limited capacity to serve as a local, let alone a regional wildlife movement corridor since it is surrounded by roads and development on three sides. The site provides minimal value to local wildlife for movement.

The Project once constructed will be consistent with surrounding areas (a mix of housing tracts, commercial development, and undeveloped parcels) and will not prevent the movement of wildlife through a wildlife corridor. Therefore, the Project is not likely to substantially interfere with the movement of any native species or native nursery site. Accordingly, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to wildlife movement relative to the 2013 General Plan EIR.

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

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

The USFWS 2007 Programmatic Biological Opinion is based on the biological framework presented in the Conservation Strategy. Projects that require a Corps permit, that remain consistent with objectives stated in the Conservation Strategy, can be appended to the Programmatic Biological Opinion at the

discretion of the USFWS. Projects that are appended to the Programmatic Biological Opinion will be provided individual take authorization for impacts to federally-listed species.

The site-specific biological resource assessment determined no naturalized habitats remain, mitigations have been satisfied, and no regulatory agency permitting would be needed for development except as required for frontage improvements in the public right of way. In the Santa Rosa Plain Conservation Strategy Plan, prepared by the U.S. Fish and Wildlife Service, the Project site is identified with a designation of "Already Developed (no potential for impact)". Therefore, the Project would have a less than significant impact relative to this topic.

The City of Cotati tree ordinance, Cotati Municipal Code Chapter 17.54 regulates the protection, preservation and maintenance of native trees, trees of historic or cultural significance, groves and stands of mature trees, and mature trees in general that are associated with proposals for development. Only one eucalyptus tree is proposed for as part of the project, but it is likely two additionally trees will be damaged or removed due to frontage improvements. To ensure compliance with Cotati Municipal Code Chapter 17.54, **COA BIO-4** requires that the applicant comply with the preservation and replacement requirements and conditions of the Tree Removal Permit. As Conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to adopted policies, ordinances, or habitat conservation plans relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Status: The Project site will result in the removal of a single eucalyptus tree and potentially two roadside oak trees dependent on the final engineering of the access points from SR-116. The project proposes to retain the remaining trees. However, additional trees could be damaged during construction. The City of Cotati Municipal Code Chapter 17.54 regulates the protection, preservation and maintenance of native trees, trees of historic or cultural significance, groves and stands of mature trees, and mature trees in general that are associated with proposals for development. Project approvals include a Tree Removal Permit which is conditioned for compliance with Chapter 17.54. **COA BIO-4** requires the implementation of tree protection measures during construction. As conditioned, the Project complies with this policy.

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

Action CON 1a: Require development project proposals, infrastructure projects, long-range planning projects, and other projects that may potentially impact special-status species and sensitive resources to submit a biological resources evaluation which determines whether significant adverse impacts will occur. Evaluations shall be carried out under the direction of the Community Development

Department and consistent with applicable state and federal guidelines. Projects shall be designed to avoid or reduce impacts to the maximum extent feasible. Where adverse impacts cannot be feasibly reduced or avoided through project design, projects shall include the implementation of site-specific or project-specific effective mitigation strategies developed by a qualified professional in consultation with state or federal resource agencies with jurisdiction (if applicable) that may include, but are not limited to, the following strategies:

- a. Preservation of habitat and connectivity of adequate size, quality, and configuration to support the special-status species. Connectivity shall be determined based on the specifics of the species' needs.
- b. Project design measures, such as clustering of structures or locating project features to avoid known locations of special-status species and/or sensitive habitats.
- c. Provision of supplemental planting and maintenance of grasses, shrubs, and trees of similar quality and quantity to provide adequate vegetation cover to enhance water quality, minimize sedimentation and soil transport, and provide adequate shelter and food for wildlife.
- d. Protection for habitat and the known locations of special-status species through adequate buffering or other means.
- e. Provision of replacement habitat of like quantity and quality on- or off-site for special status species. Preference shall be given to the preservation of habitat as close to the area of impact as feasible, so long as that habitat is of comparable quality.
- f. Enhancement of existing special-status species habitat values through restoration and replanting of native plant species.
- g. Provision of temporary or permanent buffers of adequate size (based on the specifics of the special-status species) to avoid nest abandonment by nesting migratory birds and raptors associated with construction and site development activities.
- h. Incorporation of the provisions or demonstration of compliance with applicable recovery plans for federally listed species.
- i. Monitoring of construction activities by a qualified biologist to avoid impacts to on-site special status species.

Status: In 2024, Monk and Associates conducted a full regulatory permitting and mitigation implementation review and concluded that the Project site complied with regulatory agency permits (**Appendix B**). The Biological Resource Analysis concludes that mitigation requirements at the Project site have been satisfied and no further State, Federal, or local agency requirements should be warranted. The prior regulatory compliance did not include the drainage ditch and isolated wetland that will be impacted by required frontage improvements. To ensure compliance policy and action,

COA BIO-1, BIO-2, and BIO-3 require preconstruction surveys for nesting birds and the American badger, and that the applicant secure wetland credits at a 1:1 ratio for “waters of the State” that will be impacted by offsite frontage improvements. As conditioned, the Project complies with this policy.

Conclusion and Environmental Conditions of Approval:

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

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

BIO-1: To avoid impacts to nesting raptors and passerines, a nesting bird survey should be conducted within 7 days prior to commencing with construction work if this work would begin between February 1 and August 31. The nesting bird survey shall be conducted on the project site and within a zone of influence around the project site. The zone of influence includes those areas off the project site where raptors could be disturbed by earth-moving vibrations or noise. The nesting bird survey should include examination of all suitable nesting habitats within 300 feet of the entire project site. A nesting bird survey report should be prepared upon completion of the survey and provided to the City of Cotati with any recommendations required for establishment of protective buffers as necessary to protect nesting birds.

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

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

BIO-2: To ensure there are no direct impacts to American badger, a qualified biologist will conduct a

preconstruction den survey no more than 14 days prior to site grading. If a potential den is located, infrared camera stations will be set up and maintained for three (3) consecutive nights at the potential den openings prior to initiation of grading/work activities to determine the status of the potential dens. If American badger is not found to be using the den, the burrow (den) will be filled, and site grading may proceed in the vicinity of this burrow(s) unhindered.

If American badger is found to be using a den within the area of proposed ground disturbance, provided it is not a natal den, the badger will be passively and humanely evicted from its den if it could be impacted by grading or other ground disturbing activities; a one-way eviction door placed at the den opening is the least invasive option. If a natal den is found, eviction will not take place until the young are no longer dependent on the burrow. The project proponent will consult with CDFW regarding the natal den and to discuss a suitable eviction plan. The final eviction plan will be submitted to the City of Cotati prior to implementation. Any American badger found onsite will be reported to CDFW's CNDDDB.

BIO-3: Prior to site preparation or grading, the applicant shall secure wetland mitigation credits for impacted waters of the State at a 1:1 ratio (or at the ratio required by RWQCB) from an approved bank within the same conservation area or in proximity as feasible and provide evidence of procurement to the City. During all frontage work and construction activities occurring within 25 feet of wetlands as mapped by the "Draft Aquatic Resources Delineation Map for SR-116 and West Cotati Ave Project" prepared by Monk and Associates on August 23, 2023, the applicant/contractor shall install and maintain exclusion fencing precluding inadvertent access to wetlands to be preserved.

BIO-4: Tree removal shall be done in compliance with Municipal Code Chapter 17.54. All project contractors shall implement all applicable tree protection requirements as determined by the tree removal permit.

5.5. CULTURAL RESOURCES

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Cultural Resource Evaluation of the Proposed Redwood Dr. Project in Cotati, CA, prepared by Archaeological Resource Management on October 10, 2024; Cultural Resources Addendum for the Proposed Redwood Row Project prepared by Evans & De Shazo on March 14, 2025; and Results of an Archaeological Study for the Gravenstein Highway (SR-116)/West Cotati Avenue Realignment Project prepared by Evans & De Shazo on September 28, 2023.

2013 General Plan EIR Findings:

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

- Within the Cotati Planning Area, 36 resources have been recorded of which 7 are prehistoric Native American archaeological sites, and 2 are historic-period archeological sites, and 27 are built environment resources. 31 of these resources are within City limits.
- Impact 3.4-1: Implementation of the General Plan Update could result in the potential disturbance of cultural resources and human remains. This would be a potentially significant impact and is reduced to less than significant through policies CON 4.1, 4.3, 4.4, 4.5, and 4.6.
- Impact 3.4-2: Implementation of the General Plan Update could result in the disturbance of human remains or the discovery of human remains during construction activities. The potential impact would be reduced to less than significant through procedures of the Public Resources Code Section 5097 and implementation of General Plan actions CON 4c.

Project Consistency with the 2013 General Plan EIR

Consistent with General Plan Action CON 4b, a Cultural Resource Evaluation was prepared by Archaeological Resource Management on October 10, 2024. The Report included both a records search and surface examination on the Project site.

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

As documented in the Cultural Resource Evaluation prepared by Archaeological Resource Management in 2024, the records search did not indicate the presence of resources on the project site and no artifacts or potentially significant cultural features were observed during the surface inspection.

The entire property was examined in a pedestrian survey and all areas of the site were accessible. Vegetation within the proposed project area consisted of sparse ankle-high grasses across most of the surface, as well as several established native and non-native trees. Where native soils were exposed, a medium brown to tan silty loam was observed. Rock types noted included gravel of sandstone and metamorphic rock, as well as small amounts of imported gravel.

No significant cultural materials, prehistoric or historic, were noted during surface reconnaissance and there are no structures of historic age located within the Project area. As requested during consultation with the Federated Indians of Graton Rancheria, a Historical Human Remains Detection Canine Survey (HHRCD) was completed on March 5, 2025 and a Cultural Resources Evaluation Addendum Report was prepared by Evans and Deshazo on March 14, 2025. The site was divided into 11 search areas, and each was searched by two or more dogs.

The HHRCD concluded that intact burials are not likely present. However, in order to ensure that no human remains, nor potential grave sites are disturbed, **COA CUL-1**, **CUL-2**, and **CUL-3** have been established to require tribal monitoring, post-review archaeological discoveries, and protocol in the event of the discovery of human remains, archeological, or tribal cultural resources.

Further, an Archaeological Study in accordance with CEQA regulations was completed for the SR-116/West Cotati Avenue Realignment project by Evans and De Shazo on September 28, 2023. The study included the area where frontage improvements will be required for this project. The methods used to complete the study include a NWIC/CHRIS records search; a review of historical maps, aerial photographs, and other documents to determine past land use activities within the Project Area and the potential/sensitivity for buried historic-period archaeological, as well as researching for any important historical persons associated with the Project Area; a review of geologic, soils, geoarchaeological, and other information to assess the potential/sensitivity for buried precontact period archaeological resources; a Sacred Lands Inventory and Tribal outreach; outreach to the Cotati Historical Society; and a pedestrian field survey of the SR-116/West Cotati Avenue project area. No CRHR-listed or eligible historical resources or unique archaeological resources were identified within the SR-116/West Cotati Avenue project area, which overlaps with the subject project's proposed frontage improvements. One isolated historic-period artifact (a horseshoe; age unknown) and a eucalyptus tree windrow (pre-1942) were identified but neither meets the criteria to be considered historically significant and the desktop buried archaeological site sensitivity analysis found that the SR-116/West Cotati Avenue project area has a low potential for buried precontact and historic period archaeological resources.

The project will include grading and ground disturbance, which has the potential to result in impacts to cultural resources if present. As conditioned, the Project implements policies of the General Plan for treatment of cultural resources and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to cultural resources relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Status: Archaeological Resource Management conducted an archaeological inventory and prepared a Cultural Resource Evaluation for the proposed Project on October 10, 2024 and the location of required frontage improvements was analyzed by Evans and DeShazo in a report prepared on September 28, 2023. Historical Human Remains Detection Canine Survey (HHRCD) was conducted on March 5, 2025. **COA CUL-1, CUL-2 and CUL-3** were recommended through the cultural investigations and are imposed on the project. As such, the Project complies with this action.

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

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

Status: **COA CUL-1, CUL-2 and CUL-3** requires implementation of actions that comply with Action CON 4c to address potential discovery of archeological resources and human remains during construction. As conditioned, the Project complies with this action.

Conclusion and Environmental Conditions of Approval:

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

implement the 2013 General Plan EIR mitigating policies and actions:

CUL-1: Full-time archaeological and tribal monitoring shall be conducted for all Project-related ground-disturbing activities within 200 feet of the canine alert locations and the area where the current mound of imported soil is located.

- Prior to the start of the Project, a Secretary of the Interior-qualified archaeologist shall prepare an Archaeological and Tribal Monitoring Plan (ATMP) in consultation with FIGR. The ATMP should provide a provision for a pre-construction Cultural Resources Awareness Training (CRAT) and details regarding the types of archaeological resources that could be found within the Project Area, and the procedures to follow should any archaeological material be encountered, including proper notification to Tribes, agencies, and stakeholders; and an assessment of the significance of any archaeological resources encountered during construction.
- The archaeological and tribal monitors shall be empowered to halt construction activities at the location of a discovery to review possible archaeological material and to protect the resource while the finding is being assessed. Monitoring shall continue until the Secretary of the Interior-qualified archaeologist in consultation with FIGR, determines that full time monitoring can be reduced to spot check monitoring or that monitoring is no longer warranted. A report shall also be prepared to document findings after the ground disturbance is complete.

CUL-2: If a precontact or historic period archaeological resource is encountered by equipment operators during Project-related ground-disturbing activities and an archaeologist is not present, that work be halted within 100 feet of the discovery area until a qualified professional archaeologist assesses the find and makes recommendations for the treatment of the resource.

- If avoidance of the archaeological resource is not feasible, the archaeological resource shall be evaluated for its eligibility for listing in the CRHR or as a unique archaeological resource.
- If the resource is determined to be eligible for the CRHR or is a unique archaeological resource, adverse impacts shall be mitigated.
- If the resource is a Native American resource, the assessment, evaluation, and treatment recommendations shall be made in consultation with FIGR. Mitigation may include excavation of the archaeological deposit in accordance with the Secretary of Interior's Standards and Guidelines for Archaeological Documentation, which may include data recovery using standard archaeological field methods and procedures, laboratory and technical analyses of recovered archaeological materials, preparation of a report detailing the methods, findings, and significance of the archaeological site and associated materials, and accessioning of archaeological materials and a technical data recovery report at a curation facility.
- Any report produced as a result of a discovery shall be submitted to the City of Cotati and the NWIC/CHRIS upon completion of the resource assessment. Precontact period archaeological resources commonly encountered in the area may include obsidian (shiny, black, glass-like stone) and chert flaked-stone tools (e.g., projectile points, knives, choppers), midden (culturally darkened soil containing heat-affected rock, charcoal, ash, artifacts, animal bone, or shellfish remains), stone milling equipment, such as mortars and pestles, and features such as hearths, fire pits, house floor depressions and mortuary features consisting of human skeletal remains. Historic period archaeological resources include backfilled privies, wells, and

refuse pits; concrete, stone, or wood structural elements or foundations; and concentrations of metal glass, and ceramic refuse.

CUL-3: In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.94 and Section 5097.98 shall be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

- There shall be no further excavation or disturbance within 100 feet of the remains until the Sonoma County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. The soil excavated from the discovery location shall also be secured. If the coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the most likely descendant of the deceased Native American. The most likely descendant may make recommendations for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.
- Where the following conditions occur, the landowner or authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD or on the project site in a location not subject to further subsurface disturbance:
 - The NAHC is unable to identify the most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being given access to the site.
 - The descendant identified fails to make a recommendation.
 - The landowner or authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

5.6. ENERGY

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; BAAQMD 2017 Bay Area Clean Air Plan; Climate Action 2020 and Beyond: Sonoma County Regional Climate Action Plan, prepared by Sonoma County Regional Climate Protection Authority, July 2016; BAAQMD 2022 CEQA Guidelines; and City of Cotati Municipal Code.

2013 General Plan EIR Findings:

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

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

Sonoma County Climate Action Plan 2020

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

As presented in the Climate Action Plan 2020, Section 5.2: Cotati, the City of Cotati is focused on infill development and “green” priorities for new building.⁶ Energy efficiency is a requirement of City of Cotati’s General Plan as provided in General Plan Objective Con 3A, including policies and actions which “achieve a high level of energy efficiency in new buildings and in significant remodels,” which is set forth in Municipal Code Chapter 14.04.130 and establishes CalGreen Tier 1 as mandatory for new residential and non-residential structures.

Cotati Municipal Code

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

Project Consistency with the 2013 General Plan

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

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

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

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

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

⁶ Sonoma County Regional Climate Protection Authority. Climate Action Plan 2020 and Beyond. July, 2016.

expands solar and storage requirements. It is estimated that over a 30-year period, the 2022 energy code will reduce greenhouse gas (GHG) emissions by 10 million metric tons.⁷

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

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

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

2013 General Plan EIR Mitigating Policies and Actions

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

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

Conclusion

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

⁷ State of California, Energy Commission, 2022 Building Energy Efficiency Standard Summary, August 2021.

5.7. GEOLOGY AND SOILS

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

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

☐☐☒☐

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Preliminary Geotechnical Assessment prepared by Quantum Geotechnical Inc on May 6, 2022; and Public Works/Engineering Conditions of Approval prepared on March 11, 2025.

2013 General Plan EIR Findings

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

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

- Impact 3.5-1: Implementation of the General Plan Update would result in the construction of projects that may expose people or structures to seismic ground shaking from the numerous faults located in the region. No Alquist-Priolo Fault Zones are located within the Cotati Planning Area. The General Plan includes policies and actions that require evaluation and engineering of projects to reduce the impacts of development under the General Plan from seismic shaking to less than significant.
- Impact 3.5-2: Implementation of the General Plan Update would allow ground disturbing activities that could result in soil erosion and topsoil loss. The Regional Water Quality Control Board requires that project-specific Storm Water Pollution Prevention Plan (SWPPP) to be prepared for all development projects. Application of best management practices required would reduce this impact to less than significant.
- Impact 3.5-3: Implementation of the General Plan Update would result in development that could expose people and structures to adverse effects from ground instability and failure from landslides, lateral spreading, subsidence, liquefaction, or collapse. With General Plan policies and implementing actions applied to development projects that require study and design to mitigate these risks, the impacts would be less than significant.
- Impact 3.5-4: There is expansive soil located within the City of Cotati, and implementation of the proposed project (General Plan Update) could result in development on expansive soils. With General Plan policies that require design-level geotechnical investigations for new development, the risk of impacts from expansive soils would be less than significant.
- Impact 3.5-5: Implementation of the General Plan Update would not result in a conflict between soil capacity and septic systems because sewerage and wastewater treatment capacity is sufficient to accommodate all development under the General Plan without the use of septic and none will be utilized. Therefore, this impact is less than significant.

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

Project Consistency with the 2013 General Plan EIR

5.7(a i) (Seismic faults) – No Change Relative to the General Plan EIR

The General Plan EIR determined that impacts from fault rupture, strong ground shaking, seismic-related ground failure, and landslides would be less than significant. The Project site is not located within an Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist on the site. Strong to very strong ground shaking could occur at the site during a large earthquake on one of the nearby faults. However, the risk of fault offset at the site from a known active fault and future faulting in areas where no faults previously existed is very low. The Project is subject to construction standards established for seismic safety within the latest California Building Code, which would minimize the impact of ground shaking on new development. As such the project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.7(a ii,iii) (Ground Shaking, Liquefaction) – No Substantial Change Relative to the General Plan EIR

The General Plan shows areas of moderate liquefaction potential adjacent to portions of SR-116 per Figure 7.1-2 in the General Plan Background Report. A Preliminary Geotechnical Assessment (**Appendix D**) was prepared on May 6, 2022 to identify the presence of potentially collapsible soil and evaluate the consistency of the previously placed fill areas and determine if any mitigation is needed for development.

On February 23, 2022, Quantum Geotechnical Inc. conducted eight pit tests using a track mounted mini excavator. The tests ranged from 7 to 10.5 feet below the current ground surface. Test pits were performed in areas of a previously filled pad area, in areas of previously filled wetlands, and in native areas where no historic grading is known to have occurred. At the northern part of the site, a large soil fill stockpile approximately 280 feet by 190 feet in plan area and approximately 12 feet high is present. A sample of the stockpile material was taken for future laboratory testing.

Soils on the site range from dense compacted fill material consisting of slightly moist, stiff sandy silt with sparce angular soil to highly expansive native soils. During borings conducted as part of the geotechnical investigation, the site was found to have low potential for liquefaction during strong ground shaking.

Public Works/Engineering Conditions of Approval require that all final plans receive sign off from the applicant's Geotechnical Engineer to demonstrate compliance with the Geotechnical Investigation Report.

Further, the Project would implement the recommendations of the geotechnical analysis and would be consistent with General Plan Policies SA 2.4, SA 2.11 and General Plan Actions SA 2a and SA 2e that address geologic and seismic hazard mitigations in project design, which are confirmed in the building permit review process, and implemented through **COA GEO-1**. As conditioned and through the uniformly applied standards of the California Building Code, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.7(a iv) (Landslides) – No Change Relative to the General Plan EIR

The Project site is a relatively flat, open field with an existing stockpile that is approximately 12 feet

high. The site elevations for the remainder of the site range from 105 feet to 99 feet above sea level. Because steep slopes are not located on the site or in the vicinity, there is no significant impact related to the risk of a landslide. As such the project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

The 2013 General Plan EIR concluded that impacts from soil erosion would be less than significant with General Plan Policies and Actions mitigating potential impacts. The Project site is previously disturbed from past grading and staging activities and would be developed by removing existing stockpiles and introducing new buildings, driveways, parking, and landscaping. As a project that will disturb more than 10,000 square feet of impervious surfaces, it is subject to implementation of stormwater management facilities to treat site runoff under applicable provisions of the City's MS4 permit. Best management practices for soil erosion and sediment control are required to be applied during construction. In compliance with General Plan Policy CON 1.12, **COA HYD-1** is required which will ensure Best Management Practices are implemented during construction. Additionally, Chapter 14.36 of the Cotati Municipal Code which requires, amongst other things, an erosion control plan prepared by a Civil Engineer or other qualified professional that outlines appropriate measures to minimize soil erosion and sedimentation and that complies with design and construction standards contained in the City's Municipal Code. Preliminary designs are in compliance and through the standard review process, the final plans will be reviewed by the City Engineer and subject to Project Conditions of approval as provided by Public Works/Engineering on March 11, 2025. The Public Works/Engineering Conditions include requirements for a Stormwater Pollution and Prevention Plan (SWPPP) as well as a Stormwater Control Plan and a separate Rain Event Action Plan (REAP) to be used during construction.

As conditioned, pursuant to General Plan Policy CON 1.12, the Project is consistent with the findings of the 2013 General Plan EIR and the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to erosion relative to the 2013 General Plan EIR.

5.7(c-d) (Geologic Stability and Expansive Soils) – No Substantial Change Relative to the General Plan EIR

Per the 2013 General Plan EIR, each project will be evaluated for conformance with the California Building Code, City's General Plan, Land Use Code, and other applicable regulations, in regards to geologic stability and expansive soils. In accordance with Municipal Code Chapter 14.36, as well as General Plan Policy SA 2.11, a preliminary geotechnical analysis was conducted to evaluate geotechnical conditions and provide associated recommendations for development at the site. The preliminary Geotechnical Investigation (**Appendix D**) examined geologic conditions and identified that some areas of the site contained expansive soils. In compliance with General Plan Policy SA 2.1, Action SA 2a and Action SA 2e, **COA GEO-1** is imposed to require a final Geotechnical Investigation and to ensure recommendations from the geotechnical investigation are incorporated into the project design, construction documents, and improvement plans, or as otherwise conditioned by the City Engineer and/or Chief Building Official.

As conditioned, pursuant to General Plan Policy SA 2.1, Action SA 2a and Action SA 2e, the Project is consistent with the findings of the 2013 General Plan EIR and the Project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to

geologic stability relative to the 2013 General Plan EIR.

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

Implementation of the Project would not result in a conflict between soil capacity and septic systems because sewer and wastewater treatment capacity are sufficient to accommodate all development under the General Plan without the use of septic. The Project site is zoned and planned for residential and commercial uses in the General Plan. The Project proposes to connect to the City's sewer system and will not use septic systems. As such, the Project is consistent with the findings of the 2013 General Plan EIR and the Project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to septic tanks relative to the 2013 General Plan EIR.

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

The potential to uncover undiscovered paleontological resources was considered in the 2013 General Plan EIR, in which Action CON 4c is identified, which requires work to be suspended within 100 feet of any discovered potentially unique paleontological resources and for the City to be contacted to coordinate further investigation. In compliance with Action CON 4c, **COA GEO-2** is required. **COA GEO-2** requires specific protocol to be followed if paleontological resources are encountered during ground disturbing activities.

As conditioned and pursuant to Action CON 4c, the Project complies with the General Plan and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to paleontological resources relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy SA 2.4: Development in areas subject to liquefaction, such as along East and West Cotati Avenues and Gravenstein Highway shall be reviewed by qualified soils engineers and geologists prior to development in order to ensure the safety and stability of all construction. (See Figure 7.1-2 in the General Plan Background Report).

Status: Portions of the site located along Gravenstein Highway (SR-116) are subject to liquefaction per Figure 7.1-2 in the General Plan Background Report. In accordance with Municipal Code Chapter 14.36, as well as General Plan Policy SA 2.10, a preliminary geotechnical analysis was prepared that established recommendations for construction. Confirmation that geotechnical design recommendations meeting current standards have been incorporated into construction plans and documents are required through **COA GEO-1**. As conditioned, the project complies with this policy.

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

Status: Development of the Project will require site preparation and grading activities that will potentially result in soil erosion or the loss of topsoil if not properly controlled. A preliminary Stormwater Control Plan has been submitted by the applicant and **COA HYD-2** requires the applicant

to submit a final Stormwater Control Plan which includes a sediment control plan in compliance with Chapter 14.36. As conditioned, the Project complies with this Policy.

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

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

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

Status: As noted above, a Geotechnical Investigation (**Appendix D**) was conducted that examined geologic conditions and provided recommendations for the Project site. **COA GEO-1** requires the incorporation of the recommendations from the Preliminary Geotechnical Investigation and subsequent documents into the final plans prior to submission of the building permit application. Further, Public Works/Engineering Conditions of Approval, includes requirements for grading improvements, erosion control, and geotechnical engineering. As conditioned, the project complies with this policy and associated actions.

Conclusion and Environmental Conditions of Approval:

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

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

GEO-1: The Project shall implement recommendations from the preliminary geotechnical investigation prepared by Quantum Geotechnical Inc. on May 6, 2022 (**Appendix D**).

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

All recommendations shall be incorporated into the project design, construction documents and improvement plans, or as otherwise determined by the City Engineer and/or Chief Building Official. The Project's geotechnical engineer shall inspect the construction work and shall certify to the City, prior to issuance of a certificate of occupancy, that the improvements have been constructed in accordance with the geotechnical analyses.

GEO-2: If construction or grading activities result in the discovery of unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Department shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Department.

5.8. GREENHOUSE GAS EMISSIONS

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; BAAQMD CEQA Guidelines, April 2022; and Air Quality and Greenhouse Gas Assessment by Illingworth and Rodkin on December 20, 2024.

2013 General Plan EIR Findings

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

- Impact 3.6-1: General Plan implementation could generate GHGs, either directly or indirectly, that may have a significant effect on the environment. Through the implementation of mitigating General Plan Policies CON 2.6 – CON 2.12, CON 3.1 – CON 3.6, CON 3.8 – CON 3.12, CI 1.2, CI 1.19 – CI 1.21, CI 2.1 – CI 2.3, CI 2.7 – CI 2.10, CI 2.21, CI 3.1 – CI 3.4, LU 1.4, LU 1.5, LU 2.2, LU 2.5, LU 2.10, LU 3.8, OS 1.1 – OS 1.6, OS 1.10, OS 1.11 and Actions CON 2e, CON 2f, CON 2g, CON 3a – CON 3d, CI 1q, CI 2a, CI 2i – CI 2k, CI 3a, CI 3b, LU 2b, and OS 1a – OS 1e, implementation of the General Plan would have a less than significant impact.
- Impact 3.6-2: Implementation of the General Plan would not an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The General Plan is consistent with the CCAP and AB 32 and as new projects are required to fully implement the City's Green Building Standards. Compliance with the City's Green Building Standards would reduce GHG emissions from future development to the greatest extent feasible and implementation of the General Plan would have a less than significant impact.

A number of regulations currently exist related to GHG emissions, predominantly AB 32, Executive Order S-3-05, and Senate Bill (SB) 32. AB 32 sets forth a statewide GHG emissions reduction target of 1990 levels by 2020. Executive Order S-3-05 sets forth a transitional reduction target of 2000 levels by 2010, the same target as AB 32 of 1990 levels by 2020, and further builds upon the AB 32 target by requiring a reduction to 80 percent below 1990 levels by 2050. SB 32 also builds upon AB 32 and sets forth a transitional reduction target of 40 percent below 1990 levels by 2030. To implement statewide

GHG emissions reduction targets, local jurisdictions are encouraged to prepare and adopt area-specific GHG reduction plans and/or thresholds of significance for GHG emissions.

Bay Area Management District 2022 Greenhouse Gas Thresholds

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

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

Table 5.7: Climate Impact Thresholds of Significance (Project Level)

Thresholds of Significance for Land Use Projects (Must Include A or B)
<p>A. Projects must include, at a minimum, the following project design elements:</p> <ol style="list-style-type: none"> 1. Buildings <ol style="list-style-type: none"> 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 <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> i. Residential projects: 15 percent below the existing VMT per capita

b. The project will achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

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

Sonoma County Climate Action Plan 2020

As presented in the Sonoma County Climate Action Plan 2020, the City of Cotati's GHG inventory in 2010 resulted in the emission of 52,060 metric tons of CO₂e per year (MT CO₂e/yr) and a per capita emission level of 7.2 MT CO₂e/yr. A backcast effort identified 1990 emission levels at 51,480 MT CO₂e/yr and a per capita emission level of 9.0 MT CO₂e/yr. **Table 5.8** presented below provides the forecast emission levels for the City of Cotati.

Table 5.8: GHG Emission Forecasts

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

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

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

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

Project Consistency with 2013 General Plan EIR

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

GHG emissions associated with construction were computed at 862 MT of CO₂e for the total construction period. These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions. BAAQMD also encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable. As stated in Section 5.3 Air Quality of this document, **COA AQ-1** are imposed on the project and are consistent with the BAAQMD and 2013 General Plan Policies and as conditioned

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

As discussed above in Section 5.6 Energy, the Project is subject to the California Building Code and CalGreen Energy Code. The City has adopted Tier 1 voluntary measures of CalGreen which are required for all new construction. As determined in the Energy section, the Project would not result in any wasteful, inefficient, or unnecessary energy.

As described above, BAAQMD requires the implementation of specific project design elements in order to be considered below the threshold of significance. The project's incorporation of these design elements are as follows:

1. The Project will not include natural gas appliances or natural gas.
2. Through the implementation of COA AQ-1 and AQ-2 and the application of the uniformly applied standards of CALGreen Tier 1 Building Standards as adopted by the City of Cotati, the project will be energy efficient and will not result in any wasteful or unnecessary energy usage.
3. The Vehicle Miles Traveled (VMT) for the Project (15.3) would be below the significance threshold (15.5).

The Project will provide EV parking spaces as required by Cotati Municipal Code 14.04.130. However, this would only meet Tier 1. In order to ensure that the project will not result in new or more significant impacts, **COA GHG-1** is established and requires the applicant to meet the CalGreen Tier 2 requirements for EV charging infrastructure.

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

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

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

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

2013 General Plan EIR Mitigating Policies and Actions

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

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

Status: The Project is subject to the uniformly applied standards of CALGreen Tier 1 and as conditioned by **COA GHG-1** is subject to CalGreen Tier 2. As such, the Project is consistent with this policy.

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

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

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

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

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

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

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

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

Status: The Project is located on a site that has been planned for urban development. Existing urban development includes the Cotati Cottages residential development to the northwest, retail uses to the north and west, as well as other commercial uses to the south on the opposite side of SR-116.

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

Status: The Proposed Project is subject to Measure 11-L1 (Senate Bill SB X7-7 – Water Conservation Act of 2009) and Measure 2-L1 (Solar in New Residential Development) which are identified to reduce the City of Cotati's greenhouse gas emissions in the Climate Action Plan. As the Project shall comply with water conservation and solar energy installation requirements, the Project is consistent with Policy OS 1.10 and Action CON 2e.

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

Conclusion and Environmental Conditions of Approval:

The Project is within the scope of development projected under the General Plan and as conditioned will not result in any substantial new or more severe impacts to Greenhouse Gas Emissions relative to what was identified in the 2013 General Plan EIR.

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

GHG-1: The Project shall comply with CalGreen Tier 2 Electric Vehicle charging infrastructure requirements.

5.9. HAZARDS/HAZARDOUS MATERIALS

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

loss, injury or death involving wildland fires?

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Health and Safety Code Section 25501(n)(1); Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021, prepared by Tetra Tech Consultants for Permit Sonoma, October 2021; Phase I Environmental Site Assessment prepared by Stantec on February 22, 2022; Draft Stormwater Control Plan prepared by CSW|ST2 on September 27, 2024; and Phase I Environmental Site Assessment West Cotati Avenue Alignment Project, Cotati, CA prepared by Harris and Lee Environmental Science, LLC on July 12, 2023; GeoTracker, managed by the State Water Resources Control Board, accessed December 2024; and EnviroStor, managed by the Department of Toxic Substances Control, accessed December 2024; Memorandum from Rancho Adobe Fire Protection District prepared on August 15, 2023 and reaffirmed on September 11, 2023; Public Works/Engineering Conditions of Approval prepared on March 11, 2025; and City of Cotati Municipal Code.

2013 General Plan EIR Findings

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

- Impact 3.7-1: The General Plan has the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Through the implementation of mitigating General Plan Policies CSF 3.7, CSF 3.8, SA 1.1 – SA 1.7 and Actions CSF 3d, SA 1a – SA 1i, implementation of the General Plan would have a less than significant impact.
- Impact 3.7-2: The General Plan has the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Through compliance with all existing regulations and hazard mitigation plans as well as the implementation of mitigating General Policies CSF 3.7, CSF 3.8, SA 1.1 – SA 1.7 and Actions CSF 3d, SA 1a – SA 1i, implementation of the General Plan would have a less than significant impact
- Impact 3.7-3: The General Plan has the potential to have projects located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Through Compliance with state and federal regulations and the implementation of mitigating General Plan Policies CSF 3.7, CSF 3.8, SA 1.5, SA 1.7, SA 1.9 and Actions CSF 3d, implementation of the General Plan would have a less than significant impact.
- Impact 3.7-4: The General Plan is not located within an airport land use plan, two miles of a public airport or public use airport, or within the vicinity of a private airstrip, and would not result in a safety hazard for people residing or working in the project area. The City of Cotati does not have any airport facilities located within the city limits, sphere of influence, of urban growth boundary. The City of Cotati does not lie within the Runway Protection Zone, Inner/Outer Safety Zones, Inner Turning Zone, Sideline Safety Zone, or Traffic Pattern Zone for this airport. According to the National Transportation Safety Board Aviation Accident Database, there have been no accidents within the City of Cotati between January of 1950 to

January 2014. Therefore, implementation of the General Plan would have a less than significant impact.

- Impact 3.7-5: The General Plan does not have the potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Through the implementation of mitigating General Plan Policies SA 1.1 – SA 1.6 and Actions SA 1a – SA 1i, implementation of the General Plan would have a less than significant impact.
- Impact 3.7-6: The General Plan does not have the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Through the implementation of mitigating General Plan Policies CSF 2.28 – 2.32, CSF 2.36, SA 1.1 – SA 1.7 and Actions CSF 2o, CSF 2p, SA 1a, and SA 1d, implementation of the General Plan would have a less than significant impact.

Sonoma County Hazard Mitigation Plan

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

Project Consistency with the 2013 General Plan EIR

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

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

The Project would not include routine transport and management of hazardous materials in ongoing operations. Development consists primarily of new residential units with no hazardous materials management associated with the use. The Project proposes commercial ground floor space. No specific uses have been identified for the spaces; however, based on the design and location, the spaces would most likely be oriented to resident-serving and light commercial uses (e.g., retail, restaurant, offices, and commercial services) as opposed to uses that may be more industrial in nature. Where a proposed future business may involve use, storage, handling, or transportation of hazardous materials, such business is subject to City review prior to issuance of a business license and would be required to comply with all existing federal, state, and local safety regulations governing hazardous materials.

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

Additionally, applicable regulations include the preparation of a Storm Water Pollution Prevention Plan (SWPPP) approved by the Regional Water Quality Control Board prior to construction. **COA HYD-1** requires that the applicant receive approval of the SWPPP prior to commencing site preparation, grading or construction, which is also a requirement of the Public Works/Engineering Project Conditions of Approval. Additionally Public Works/Engineering requires that the project comply with the condition that if hazardous waste is encountered during the construction of the project all work shall be stopped immediately and the Sonoma County Environmental Health Department, the Fire District, the Police Department, and the City Inspector be notified. Work shall not proceed until clearance has been issued by all of these agencies. Compliance with standard Public Works and Engineering conditions of approval ensures project consistency with General Plan polices related to hazardous materials.

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

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

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

There are no schools within 0.25 miles of the project site. The nearest school to the Project site, Thomas Page Academy, is located approximately 0.4 miles southwest. Additionally, there are no activities associated with the proposed Project that would pose a threat to nearby schools from the release or handling of hazardous materials. Through the implementation of applicable state and local regulations, the Project will not result in accidental exposure related to the handling of hazardous materials or result in any increased risk of exposure to existing schools. Therefore, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

The 2013 General Plan EIR found six sites that were on a list of hazardous materials sites, however the cases were in various stages of clean up and the Project site is not listed as a site that has or had an open case. A review of available records, databases (EnviroStor and GeoTracker) and reports indicate the Project is not located on a hazardous materials site. The nearest voluntary cleanup site under EnviroStor is the Cotati Rod and Gun Club, located approximately 1 mile west of the Project site. The Project site is not identified as a Leaking Underground Storage Tank (LUST) Cleanup Site or Cleanup Program Site under Geotracker. Two sites with records of prior hazardous materials cleanup in Geotracker have been identified in the vicinity. However, cleanup has been completed and the cases have been closed: the LUST cleanup listed at 8505 Gravenstein Highway for Arco #1341, (T0609700006) was closed in 2014 and the Cleanup Program Site for BP Service Station (T0609700386) was closed in 2020. Additionally, a Phase I Environmental Site Assessment, prepared by Stantec (2022)

evaluated the site for potential hazardous materials contamination and found no evidence of recognized environmental conditions⁸ in connection to the property (**Appendix E**).

Further, a Phase I Environmental Site Assessment was conducted by Harris and Lee Environmental Sciences, LLC dated July 12, 2023, that evaluates the portion of the site where frontage improvements are required. Due to long term road use on SR-116, aerially deposited lead (ADL) may be present on the areas of the site subject to frontage improvements. The construction of frontage improvement will include grading and trenching as well as repaving. During this work, soils that potentially contain ADLs and petroleum hydrocarbons may be disturbed. In order to ensure that no hazardous materials are released into the environment during the construction of the Project, **COA HAZ-1** requires a Lead Compliance Plan (LCP), a Soil Management Plan (SMP), and a Health and Safety Plan (HASP) be prepared in compliance with Caltrans guidelines prior to construction. The plan shall include sampling and analyzing soil for lead and petroleum hydrocarbons, appropriate disposal of any hazardous materials, and health and safety protections for workers handling contaminated soils.

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

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

The General Plan is not located within an airport land use plan, two miles of a public airport or public use airport, or within the vicinity of a private airstrip, and would not result in a safety hazard for people residing or working in the project area. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

The Project is within the projected development under the General Plan and does not interfere with emergency response and evacuation plans. The Rancho Adobe Fire Protection District (RAFD) has reviewed the proposed site plan and did not indicate issues with emergency response and access in connection to site design. The project design includes emergency vehicle access and will undergo final review and permitting by the RAFD to confirm compliance with uniformly applied emergency vehicle access requirements prior to issuance of a building permit. The Project site is located outside of local and State fire hazard severity zones and through the application of uniformly applied standards would not expose people or structures to significant wildland fire risks.

2013 General Plan EIR Mitigating Policies and Actions

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

Status: The construction phase of the Project may involve use and handling of hazardous materials as part of construction. In compliance with Policy CSF 3.7, through the application of uniform

⁸ Recognized Environmental Conditions - the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws (Phase I Environmental Assessment prepared by Property Solutions, Inc),

standards applied during the building permitting process, the project must comply with all local, State, and federal regulatory standards applicable to management of hazardous materials associated with the Project and to obtain any necessary approvals from Sonoma County. As such, the Project complies with Policy CSF 3.7.

Conclusion and Environmental Conditions of Approval:

The uniformly applied laws for the handling of hazardous materials as well as the Project conditions ensure that the Project is consistent with federal, state, and local regulations for the treatment of hazardous materials as identified in the 2013 General Plan EIR. The Project is within the scope of development projected under the General Plan and will not result in any substantial new or more severe impacts related to hazards and hazardous materials relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental condition of approval is required to implement the 2013 General Plan EIR mitigating policies and actions:

HAZ-1: Prior to commencing work within Caltrans Right of Way, the Applicant shall prepare a Lead Compliance Plan and a Soil Management Plan in compliance with current Caltrans guidelines, and a worker Health and Safety Plan for review and acceptance by the City of Cotati. The plans shall be implemented during frontage improvements on SR-116 and shall address:

- Sampling and analysis of soils prior to earth-moving work
- transportation and disposal of any contaminated soil in compliance with state and federal law
- worker health and safety during the handling of potentially hazardous soils

5.10. HYDROLOGY AND WATER QUALITY

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

plan or sustainable groundwater management plan?

Sources: Cotati General Plan adopted and 2013 General Plan EIR certified on March 24, 2015; Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin prepared by Sonoma Water and approved on January 26, 2023; Public Works Draft Conditions of Approval Memo prepared on March 11, 2025; Hydrology and Hydraulics Study for Cotati Condominiums prepared by CSW/Stuber-Stroeh Engineering Group, Inc. on October 4, 2024; and Stormwater Control Plan for Cotati Commons prepared by CSW/Stuber-Stroeh Engineering Group, Inc. on September 27, 2024.

2013 General Plan EIR Findings

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

- Impact 3.8.1 – Implementation of the General Plan could result in a violation of water quality standards or waste discharge requirements. Through the implementation of the mitigating Policies CON 1.8 – CON 1.14 and Actions CON 1f – CON 1k, and the requirements of the NPDES Phase 1 MS4 permit and the LID Manual requirements, implementation of the General Plan would have a less than significant impact.
- Impact 3.8.2 – Implementation of the General Plan could contribute to the depletion of groundwater supplies or interfere substantially with groundwater recharge. Through the implementation of the mitigating General Plan Policies CSF 2.1- CSF 2.15 and Actions CSF 2a - CSF 2g, combined with the City continuing to obtain surface water from the Russian River and reducing the consumption of groundwater, implementation of the General Plan would have a less than significant impact.
- Impact 3.8.3 – Implementation of the General Plan could alter the existing drainage pattern in a manner which would result in substantial erosion, siltation, flooding, or polluted runoff. Through the implementation of the mitigating General Plan Policies CON 1.1, CON 1.2, CON 1.7 – CON 1.14, SA 3.1 – 3.13, Actions CON 1f – CON 1k, SA 3a – 3h, and compliance with state and local regulations, implementation of the General Plan would have a less than significant impact.
- Impact 3.8.4 – Implementation of the General Plan could otherwise substantially degrade water quality. Through the implementation of the mitigating General Plan Policies CON 1.8 – CON 1.14, Actions CON 1f – CON 1k, and compliance with state and local regulations, implementation of the General Plan would have a less than significant impact.
- Impact 3.8.5 – General Plan implementation could place housing and structures within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Through the implementation of the mitigating General Plan Policies SA 3.1 – SA 3.13, Actions SA 3a – 3h, and compliance with state and local regulations, implementation of the General Plan would have a less than significant impact.
- Impact 3.8.6 – Implementation of the General Plan Update would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of failure

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

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

Stormwater Regulation

The State Water Resources Control Board (SWRCB) is responsible for implementing the Clean Water Act (CWA) and has issued a statewide General Permit for construction, which acts to minimize pollutant runoff to surface waters and groundwater. The City of Cotati is mostly located within the North Coast Hydrologic Region, which manages the Russian River watershed, and a portion of the southern part of the city drains to San Pablo Bay by the Petaluma River and is managed as a part of the San Francisco Bay Hydrologic Region. Within the city, there are two hydrologic subareas, the Upper Laguna de Santa Rosa Subarea (Russian River) and the Petaluma River Subarea (San Pablo). Cotati has joined with other permittees in the Santa Rosa Plain under a Phase 1 NPDES permit (Water Quality Order No. R1-2009-0050) (NPDES No. CA0025054) which imposes requirements on municipalities to mitigate for stormwater quality and quantity and provides the Santa Rosa Storm Water Low Impact Development Technical Design Manual (LID Manual) as guidance.

Project Consistency with the 2013 General Plan EIR

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

Construction

The Project's construction activities and the installation of new impervious areas have the potential to result in increased runoff that could contain sediment and other pollutants that could degrade water quality if not properly controlled. Potential pollutants commonly associated with construction include fuel, grease, oil, concrete material, sediment, and litter. However, as concluded in the 2013 General Plan EIR, the NPDES requirements, including the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) and compliance with the RWQCB Order No. R1-2015-0030, Waste Discharge Requirements minimize the impacts from development activities. The purpose of the SWPPP is to identify potential sediment sources and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination impacts would not occur during construction activities.

Public Works has imposed a Condition of Approval that requires that the SWPPP be approved by the North Coast Regional Water Quality Control Board (NCRWQCB). Further, the Project is required to conform to Chapter 14.36 of the Municipal Code, which contains grading and erosion control requirements. In compliance with the 2013 General Plan Policy CON 1.12, Policy SA 3.3, and Policy SA 3.13, **COA HYD-1** requires that the applicant secure an SWPPP approved by the NCRWQCB and submit to the City Engineer prior to issuance of a grading permit. With condition of approval, implementing the Policies of the General Plan and in conformance with RWQCB Order No. R1-2015-0030, the

Project's potential to result in impacts due to contaminated discharges during construction will be less than significant.

Operation

The proposed Project is required to conform to Chapter 13.68 of the Cotati Municipal Code, which regulates storm water discharge. A preliminary Stormwater Control Plan was prepared for the Project that demonstrates that Low Impact Design Strategies can feasibly pre-treat stormwater prior to entry into the municipal storm drain. A preliminary Hydrology Report was prepared by CSW/Stuber-Stroeh Engineering Group, Inc. (October 2024) that evaluated existing hydrology of the site and the proposed stormwater conditions. The report concluded that sufficient capacity exists in the proposed storm drain network to convey the 10-year storm event to the treatment areas and offsite. The report also concluded that the storm drain network proposed is compliant with the City of Cotati Storm Drain Master Plan.

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

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

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

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

The State of California adopted the Sustainable Groundwater Management Act (SGMA) in 2014 which called for the creation of local Groundwater Sustainability Agencies (GSA) to develop and implement Groundwater Sustainability Plans for the long-term management of groundwater resources. The Santa Rosa Plain GSA was formed through a joint powers authority (JPA) between the cities of Cotati, Rohnert Park, Santa Rosa, and Sebastopol, Town of Windsor, County of Sonoma, Sonoma Water, Gold Ridge Resource Conservation District, and Sonoma Resource Conservation District (Sonoma RCD) and has a participation agreement with mutual water companies and CPUC-regulated water corporations that allows for participation in the GSA. The Groundwater Sustainability Plan (GSP) for the Santa Rosa Plain Subbasin was approved by the California Department of Water Resources (DWR) on January 26,

2023. It establishes a standard for sustainability of groundwater management and use and determines how the basin will achieve this standard by 2042.

The Project proposes to rely exclusively on municipal water supplies and does not propose the extraction or use of groundwater. Furthermore, the Project is required to comply with guidance from the Bay Area Stormwater Management Agencies Association (BASMAA) Post-Construction Manual, including low impact development strategies and best management practices in site design to mimic pre-project site hydrology as required by **COA HYD-1**. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

The 2013 General Plan EIR determined that impacts due to increase in impervious surfaces and alteration of drainage conditions, as they relate to erosion, runoff, and drainage flow would be less than significant with General Plan policies and mitigation. Implementation of General Plan policies, Municipal Code, and applicable provisions of the City's MS4 permit were identified as measures that would reduce impacts to less than significant levels. The Project will comply with these requirements and is subject to **COA HYD-1**. The site design would also implement best practices for low impact development to mimic pre-project site hydrology through **COA HYD-2**. The Public Works/Engineering conditions require the implementation of the recommendations and methodology proposed in the Hydrology and Hydraulic Study (**Appendix F**). Further, as discussed in the Public Works Draft Conditions of Approval Memo prepared on March 11, 2025, to ensure compliance with the MS4 permit, the City Engineer requires final submittal of a map showing storm water drainage through the project.

The City is served by an existing storm drain system, and the City Engineering Division confirms infrastructure capacity for new developments. As new development has the potential to incrementally increase the use of storm drains, the City has established development impact fees levied on new developments to contribute to any needed new or expanded infrastructure. Payment of development impact fees, as well as review of final drainage plans for compliance with uniformly applied standards, is a requirement in the building permit process. Development impacts fees are used to maintain and build out the city's storm drain system as planned. The Project includes a preliminary plan for onsite infiltration and connection to the storm drain system. To ensure compliance with the 2013 General Plan EIR Policy CON 1.12, SA 3.2, and SA 3.3, **COA HYD-2** requires the applicant to submit the final plans showing drainage and stormwater management for final review and approval to the City Engineer prior to issuance of the building permit. The plans shall include onsite storm drain infrastructure with connections to the existing storm drain system and shall pay any required development impact fees. As conditioned, and through the application of uniformly applied standards, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

The City of Cotati is subject to flooding of the Laguna de Santa Rosa and Cotati creeks and implementation of the General Plan could result in the flooding of development in these areas. As shown in Figure 3.8-1: Watersheds of the 2013 General Plan EIR, the Project site is not located near any streams or rivers that could be directly impacted by the proposed Project. As shown in Figure 3.8-

2: Flood Hazard Map of the 2013 General Plan EIR, the Project site is located within the 500-year floodplain, a low to moderate flood hazard area; therefore, the Project would not place housing within a regulated flood hazard area. Therefore, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

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

The Project would meet this requirement through compliance with procedures under Chapters 13.68 and 14.36 of the Municipal Code. **COA HYD-1** and **COA HYD-2** require implementation of pertinent local, state, and federal agency requirements, including the Cotati Municipal Code, and ensures the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Status: The Project is subject to the regulations of the Regional Water Quality Control Board and as a project that is larger than one acre is required to prepare a Storm Water Pollution Prevention Plan (SWPPP), comply with the RWQCB Order No. R1-2015-0030 Waste Discharge Requirements, implement BMPs, and comply with the City's Municipal Code Chapter 13.68 which regulates storm water discharge, as well as Chapter 14.36, which regulates erosion and sediment control. A preliminary storm water control plan has been prepared and **COA HYD-2** requires submittal of final plans and acceptance by the City Engineer to ensure incorporation of regulations into Project construction and operation. As conditioned, the Project is consistent with this policy.

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

Status: The Project is designed to include a series of bioswales and bioretention areas that will remove surface water pollutants prior to entering into storm drains and as such complies with Policy CON 1.13.

Policy SA 3.2: Require all development projects to demonstrate how storm water runoff will be detained or retained on-site and/or conveyed to the nearest drainage facility as part of the development review process. Project applicants shall demonstrate that project implementation would comply with all applicable provisions of the City's MS4 permit and companion documents, which collectively define the design storm event for water detention and retention features.

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

Status: The Project includes the use of bioretention facilities that will treat stormwater on site and storm drain lines that connect to the existing storm drain system. As new development has the potential to incrementally increase the use of storm drains, the City has established development impact fees levied on new developments to contribute to any needed infrastructure. The City Engineering Division reviews preliminary plans as well as final construction plans to assess infrastructure capacity for new developments and application of best practices for low impact development to manage runoff. The City Engineer has reviewed the Hydrology and Hydraulics Study (**Appendix F**) prepared by the applicant and has established conditions of approval accordingly. Further, implementation of **COA HYD-2** ensures that the Project complies with Policies SA 3.2 and SA 3.3.

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

Status: In order to develop the vacant site, removal of vegetation and soil compaction is required. The site is dominated by ruderal vegetation and some native and non-native trees. The landscaping plan includes the preservation of one heritage oak tree within the central portion of the Project site and the trees on the southeastern portion of the site. . Compaction and treatment of expansive soils would be conducted in accordance with the recommendations of the Project geotechnical report, as required by **COA GEO-1**, to treat soil to the extent required to accommodate the proposed development. The Project would be required to implement low impact development strategies per the Santa Rosa Storm Water Low Impact Development Technical Design Manual and in compliance with **COA HYD-2**. As conditioned the project complies with this policy.

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

Status: Best management practices for soil erosion and sediment control are required to be applied during construction. Compliance with these uniformly applied development standards ensure that potential adverse effects of erosion during construction are avoided. The Project is subject to Municipal Code Chapter 14.36, Erosion and Sediment Control Plan, which requires preparation and implementation of a final erosion and sediment control plan. **COA HYD-1** requires that the applicant submit an approved Stormwater Pollution Prevention Plan (SWPPP) to the City Engineer prior to issuance of the grading permit. As conditioned, the Project complies with Policy SA 3.2

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

Status: A hydrology and hydraulics study for the project, dated October 4, 2024, was prepared by CSW/Stuber-Stroeh Engineering Group, Inc, encompasses the Project site and drainage area as required by SA 3g. The City Engineer has conducted an initial review of the proposed plans and provided a memo that includes conditions of approval. Through the application of uniform regulations, the final construction plan set, and hydrological analysis are required to be submitted for review and approval by the City Engineer prior to permit issuance in order to confirm compliance with requirements of Chapters 13.68 and 14.36 of the Municipal Code and the Regional Water Quality Control Board. Therefore, the project complies with this policy.

Conclusion and Environmental Conditions of Approval:

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

HYD-1: The applicant shall submit a Storm Water Prevention and Pollution Plan (SWPPP) and erosion and sediment control plan approved by the Regional Water Quality Control Board to the City Engineer prior to the issuance of a grading permit. The SWPPP shall include Best Management Practices for construction activities as well as accounting for any BMPs required for operational activities. The SWPPP shall incorporate the requirements of all applicable federal, state, and local regulations. Submitted plans shall also demonstrate compliance with City of Cotati Municipal Code Chapter 13.68 Storm Water Ordinance and Chapter 14.36 Erosion and Sediment Control.

HYD-2: Prior to issuance of a grading or building permit, the applicant shall submit final drainage plans including a final Stormwater Low Impact Development and Stormwater Control Plan that implements the Hydrology and Hydraulics Study for review and approval by the City Engineer prior to issuance of the building permit.

5.11. LAND USE AND PLANNING

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

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

2013 General Plan EIR Findings

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

- Impact 3.9-1: General Plan implementation has the potential to physically divide an established community. The proposed General Plan does not include any new areas designated for urbanization or new roadways, infrastructure, or other features that would divide existing communities and would result in a less than significant impact.
- Impact 3.9-2: General Plan implementation has the potential to conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted to avoid or mitigate an environmental effect. Implementation of the General Plan could result in potential adverse environmental impacts, including traffic, noise, water quality, biological resources, drainage and water quality, air quality, hazards, geology/soils, and cultural resources. Through compliance with local, state, and federal regulations as well as the mitigating policies and actions evaluated in the 2013 General Plan EIR, implementation of the General Plan would have a less than significant impact.

Project Consistency with the 2013 General Plan EIR**5.11(a) (Physically Divide Community) - No Change Relative to the General Plan EIR**

The Project proposes development on a privately-owned, vacant parcel. The site is surrounded by an existing road to the south, Lowe's to the north, the Cotati Cottages residential development to the northwest, a vacant parcel to the west (recently approved for mixed use development), and other residential and commercial development to the east and south. The Project would introduce new residences, commercial space, and site access/circulation in a manner anticipated by the General Plan and consistent with the site's zoning. As such, the Project would not physically divide a community. Additionally, the project's internal circulation is designed to connect to the approved development

west of the site (Cotati Villages 1). Finally, the Project includes the installation of a multi-use pathway along the project site frontage to SR-116, which would connect to other planned and existing pathways. Therefore, the Project would not substantially increase the severity of the less than significant impacts nor would it result in new significant impacts related to physical division of an established community that were not identified in the 2013 General Plan EIR.

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

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

2013 General Plan EIR Mitigating Policies and Actions

There are no applicable 2013 General Plan EIR mitigation measures related to Land Use.

Conclusion

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

5.12. MINERAL RESOURCES

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

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

2013 General Plan EIR Findings

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

Project Consistency with the 2013 General Plan EIR**5.12(a-b) (Mineral Resources) – No Change Relative to the General Plan EIR**

The site does not contain known significant mineral resources of value.⁹ As such, the Project will not impact mineral resources and the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Conclusion

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

⁹ California DOC, Division of Mine Reclamation. Mines Online. <https://maps.conservation.ca.gov/mol/index.html> Accessed: December 5, 2024.

5.13. NOISE

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; City of Cotati Municipal Code; and Redwood Row Noise and Vibration Assessment prepared by Illingworth and Rodkin on December 20, 2024.

2013 General Plan EIR Findings

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

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

- Impact 3.10-1: General Plan implementation has the potential increase ambient noise levels due to traffic noise sources. While implementation of the Policies N 1.1 – N 1.3, N1.6 – N 1.14 and Actions N 1a – N 1g of the General Plan will reduce noise and land use compatibility impacts from vehicular traffic noise sources and would ensure that new development is designed to include noise-attenuating features, some traffic noise impacts cannot be mitigated to a less-than-significant level due the proximity of sensitive receivers to major roadways, and because

noise attenuation may not be feasible in all circumstances. Therefore, implementation of the General Plan could potentially result in a significant increase in ambient noise levels and would result in a significant and unavoidable impact.

- Impact 3.10-2: General Plan implementation has the potential increase ambient noise levels due to railroad noise sources. This is considered a less than significant impact. Through the implementation of the mitigating General Plan Policies N 1.1 – N 1.3, N 1.8, N 1.11, and Actions N 1a – N 1c, and 1g, implementation of the General Plan would have a less than significant impact.
- Impact 3.10-3: General Plan implementation has the potential increase ambient noise levels due to stationary noise sources. Through the implementation of the mitigating General Plan Policies N 1.1, N 1.2, N 1.3, N 1.4, N 1.5, N 1.7, N 1.8, N 1.9, N 1.11, N 1.13, and Actions N 1a – N 1c, and 1g, implementation of the General Plan would have a less than significant impact.
- Impact 3.10-4: General Plan implementation has the potential increase ambient noise levels due to construction noise sources. Through the implementation of the mitigating General Plan Policies N 1.5, N 1.12, and Actions N 1c, N 1d, N 1e, and N 1h, implementation of the General Plan would have a less than significant impact.
- Impact 3.10-5: General Plan implementation has the potential to cause increased perceptible groundborne vibration levels during construction. Through the implementation of the mitigating General Plan Policies N 1.5, N 1.12, N 1.15, and Actions N 1c and N 1h, implementation of the General Plan would have a less than significant impact.
- Impact 3.10-7: Under cumulative conditions, the General Plan would accommodate development that would result in increased traffic noise and an increase in stationary noise sources. The General Plan includes mitigating Policies N 1.1- N 1.14, and Actions N 1a – N1h that are intended to reduce noise associated with both stationary sources and traffic. While these policies will reduce noise impacts, some traffic noise impacts cannot be mitigated to a less-than-significant level due the proximity of sensitive receivers to major roadways, and because noise attenuation may not be feasible in all circumstances. As a result, this is a significant and unavoidable cumulative impact.
- The City of Cotati adopted the Findings of Fact and Statement of Overriding Considerations on March 24, 2015, including for the significant and unavoidable impacts identified for Noise (Impact 3.10-1 and 3.10-7). The City findings determined that subsequent development under the General Plan would result in an increase in noise. While consistency with policies and actions would help reduce exposure of sensitive receptors to noise levels, it may not be feasible to mitigate the impact to less than significant levels in all instances, particularly where existing development is located near proposed development. Additionally, some traffic noise impacts cannot be mitigated to less than significant levels due to proximity of sensitive receptors to major roadways and noise attenuation may not be feasible in all circumstances. The City findings determined that despite the significant and unavoidable impact to noise, no other

project alternative would meet the City's objective to realize the development potential of undeveloped lands for residential, office, and commercial uses necessary for housing opportunity and job growth.

Project Consistency with the 2013 General Plan EIR

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

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

A Noise and Vibration Assessment was prepared for the proposed Project (**Appendix H**). A noise monitoring survey was conducted October 16-18, 2024, with measurements at three long-term and two-short-term locations.

Long-term One noise measurement (LT-1) used a location at the southeastern boundary of the project site, approximately 210 feet north of the centerline of SR-116 and 155 feet west of the centerline of Redwood Drive. Hourly average noise levels at LT-1 typically ranged from 51 to 62 dBA Leq during the day (between 7:00 a.m. and 10:00 p.m.) and from 45 to 61 dBA Leq at night (between 10:00 p.m. and 7:00 a.m.).

Long-term Two noise measurement (LT-2) measured noise levels along the southern boundary of the project site, approximately 30 feet north of the centerline of Highway 116. Hourly average noise levels at this location typically ranged from 67 to 75 dBA Leq during the day and from 59 to 71 dBA Leq at night.

Long-Term Three noise measurement (LT-3) was made near the northeastern boundary, approximately 30 feet from the property line shared with Lowes. Hourly average noise levels at this location typically ranged from 46 to 59 dBA Leq during the day and from 43 to 59 dBA Leq at night.

Short-term (ST) noise measurements were made over 10-minute measurement periods, concurrent with the long-term noise data on October 16, 2024, between 10:40 a.m. and 11:10 a.m. They were located near the center of the site (ST-1) and along the eastern boundary of the site (ST-2). The background ambient noise levels at (ST-1) ranged from 48 to 50 dBA and the 10-minute average noise level was 56 dBA Leq. The background ambient noise levels at ST-2 ranged from 46 to 48 dBA and the 10-minute average noise level was 50 dBA Leq.

Noise levels at outdoor use areas that are affected by transportation noise are required to be maintained at or below 65 dBA L_{dn} to be considered normally acceptable for multi-family residential land uses, according to the City's General Plan. Additionally, the Cal Green Code standards specify an interior noise environment attributable to exterior sources not to exceed an hourly equivalent noise level (Leq) of 50 dBA in occupied areas of nonresidential uses during any hour of operation.

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

Noise & Future Residents

The future noise environment at the project site would continue to result primarily from vehicular traffic along nearby U.S. Highway 101 and SR-116. Additionally, mechanical equipment noise from the surrounding commercial uses would continue to contribute to the ambient noise environment at the project site. To estimate the future permanent noise level increase, a 1% to 2% traffic increase per year through 2045 was estimated. The noise level increase by the year 2045 was calculated to be 2 dBA Ldn. This increase was applied throughout the project site to represent worst-case conditions.

The site plan shows a community pool and deck near the center of the site; a children's play area and community park with a social seating area east of the pool area; and a public park at the rear of the site along the western boundary. The centers of each of the outdoor use areas would range from 190 to 435 feet from the centerline of SR-116 and would receive some shielding from the buildings introduced by the project. These intervening buildings would offer shielding from the noise and with such shielding future exterior noise levels would be below 65 dBA Ldn at each of the outdoor use areas.

Residential interior noise levels are required to meet the performance standard of 45 dBA Ldn. The Cal Green Code standards specify an interior noise environment attributable to exterior sources not to exceed an hourly equivalent noise level (Leq) of 50 dBA in occupied areas of nonresidential uses during any hour of operation. The two buildings that front SR-116 have ground-level commercial uses that face the roadway and residential units on the upper levels. With setbacks of 60 feet from the centerline of SR-116, these units would be exposed to future exterior noise levels of 73 dBA Ldn. Assuming windows to be partially open, future interior noise levels in the residential units would be up to 58 dBA Ldn. The apartment building would also have direct line-of-site to SR-116 with setbacks from 80-210 feet from the centerline of SR-116. Some units in the apartment building would be exposed to future exterior noise levels ranging from 66 to 72 dBA Ldn. Assuming windows to be partially open, future interior noise levels in these units would range from 51 to 57 dBA Ldn. All other buildings on the site would be adequately shielded and exposed to future noise levels at or below 60 dBA Ldn and assuming windows to be partially open, future interior noise levels would be at or below 45 dBA Ldn. To ensure the project complies with the uniformly applied standards of the California Building Code, **COA NOI-1** has been established, which requires that interior noise level to be at or below 45 dBA.

Temporary Construction Noise

Project construction is expected to be completed over approximately 18 months, with construction work occurring Monday through Friday between 8:00 a.m. and 5:00 p.m. Construction phases would include site preparation, excavation/grading, trenching/foundation, building exterior, architectural coating, and paving. During each phase of construction, there would be a different mix of equipment operating, and noise levels would vary by phase and vary

within phases, based on the amount of equipment in operation and the location at which the equipment is operating. The typical range of maximum instantaneous noise levels for the proposed project would be 70 to 90 dBA L_{max} at a distance of 50 feet from the equipment. Table 5.9 shows the typical ranges of construction noise at 50 ft.

Table 5.9: Typical Ranges of Leq Construction Noise Levels at 50 Feet, dBA

Construction Stage	Domestic Housing		Public Works Roads & Highways, Sewers, and Trenches	
	I	II	I	II
Ground Clearing	83	83	84	84
Evacuation	88	75	88	78
Foundations	81	81	88	88
Erection	81	65	79	78
Finishing	88	72	84	84
I – All pertinent equipment present at site, II – Minimum required equipment present at site.				

Source: Noise and Vibration Assessment, prepared by Illingworth and Rodkin, Inc, December 20, 2024

Federal Highway Administration's (FHWA's) Roadway Construction Noise Model (RCNM) was used to calculate the hourly average noise levels for each phase of construction, assuming the two loudest pieces of equipment would operate simultaneously at the receiving property lines of the noise-sensitive receptors surrounding the site.

Table 5.10 Estimated Construction Noise by Activity

Phase of Construction	Total Number of Workdays	Construction Equipment (Quantity)	Estimated Construction Noise Level at 50 ft. dBA Leq
Site Preparation	10	Rubber-Tired Dozer (3) ^a Tractor/Loader/Backhoe (4) ^a	82
Grading/Excavation	30	Excavator (2) Grader (1) ^a Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (2) ^a Scraper (2)	84
Trenching/Foundation	30	Tractor/Loader/Backhoe (1) ^a Excavator (1) ^a	82
Building – Exterior	300	Crane (1) Forklift (3) Generator Set (1) ^a Tractor/Loader/Backhoe (3) ^a Welder (1)	82
Building – Interior	20	Air Compressor (1) ^a	74
Paving	20	Paver (2) ^a Paving Equipment (2) ^a Roller (2)	83

^a Denotes two loudest pieces of construction equipment per phase.

Construction noise levels would intermittently range from 74 to 84 dBA Leq when activities occur 50 feet from nearby receptors. While construction noise levels would not exceed the FTA's 85 dBA Leq threshold at the surrounding commercial uses, construction noise levels would potentially exceed the exterior threshold of 80 dBA Leq at the residential uses adjoining the site by up to 4 dBA when activities would occur within 50 feet of the receptors. In accordance with General Plan Action N1h, **COA NOI-2** has been established which requires project construction to incorporate Construction Best Management Practices to reduce the impacts of noise. With the implementation of **COA NOI-2**, the project will not have new noise impacts from construction.

Operational Noise

According to the Noise Analysis provided by Illingworth and Rodkin and Policy N 1.7 of the City's General Plan, a significant impact would occur if the stationary or non-transportation noise sources generated by the project results in an exceedance of the noise level standards contained in this Noise Element, or the project will result in an increase in ambient noise levels by more than 3 dBA.

For transportation sources, a significant impact would occur if the permanent noise level increase due to project-generated traffic was 5 dBA Ldn or greater where existing traffic noise levels are less than 60 dBA Ldn at the outdoor activity areas of noise-sensitive uses; was 3 dBA Ldn or greater where existing traffic noise levels range between 60 and 65 dB Ldn at the outdoor activity areas of noise-sensitive uses; or was 1.5 dBA Ldn where existing traffic noise levels are greater than 65 dB Ldn at the outdoor activity areas of noise-sensitive uses.

The Project would add 86 peak AM hour trips and 116 peak PM hour trips to existing traffic volumes. Compared to the existing volumes along SR-116 (1250 during the peak hour), these peak hour trips would not result in a measurable or detectable noise level increase (0 dBA Ldn increase). The project's trips are also not anticipated to result in a significant increase in noise along other roadways, as the project's trips are minimal and would disperse beyond SR-116, the primary point of project access.

The site plan shows a transformer located on the ground level in the northeast corner of Building B. Transformers up to 1,000 kVA typically generate noise levels up to 64 dB, as measured at 1 meter (about 3 feet). Assuming the transformer runs continuously during daytime and nighttime hours, the day-night average noise level would be 70 dBA Ldn at a distance of about 3 feet. Due to the location of the transformer, all surrounding receptors to the north and east would be well shielded from transformer noise. The future residences to the west and commercial uses to the south would be mostly shielded, as well. These receptors would be 250 feet or more from the transformer, and the unattenuated hourly average noise levels would be at or below 26 dBA Leq, which would be below existing ambient noise levels. Over a 24-hour period, the day-night average noise level would be at or below 32 dBA Ldn. When added to the existing ambient noise environment, transformer noise would not result in a measurable or detectable noise level increase (i.e., 0 dBA Ldn increase).

The occupation and use of the project would generate noise typical of residential developments and commercial tenant spaces. Noises such as voices of residents, home maintenance activities, and barking dogs are typical of residential uses. Heating Ventilation and Air Conditioning (HVAC)

and other mechanical equipment associated with the development would contribute to the noise environment.

Typical noise levels produced by residential HVAC units would range from 53 to 63 dBA at 3 feet during operation. These types of units typically cycle on and off continuously during daytime and nighttime hours. Assuming up to four units operate simultaneously at any given time in the same general area of the roof, the estimated hourly average noise level at 3 feet would be 69 dBA Leq, and the day-night average noise level would be 75 dBA Ldn, assuming this worst hour level operates over a 24-hour period. The site plan also shows parapet walls about 3.5 feet high surrounding the rooftop units. For all surrounding receptors, located at the ground level or elevated above the ground by up to three stories, a minimum attenuation of 11 dBA would be provided by the elevation of the units above the ground and the parapet wall. This attenuation would apply to all receptors, future and existing. With attenuation, rooftop equipment (HVAC) would range from 28-40 dBA. Ldn. Therefore, mechanical equipment noise levels would not exceed the existing ambient average hourly average noise levels during daytime or nighttime hours and would not result in a measurable or detectable noise level increase.

The operational noise levels produced by the proposed project combined (i.e., traffic, mechanical equipment) would not result in a measurable or detectable noise level increase at existing noise-sensitive receptors in the project vicinity.

As conditioned, the Project will not substantially increase the severity of the significance of impacts nor would it result in new significant impacts relative to the 2013 General Plan EIR.

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

The Project would not result in long-term and excessive groundborne vibration and groundborne noise once operational. The City of Cotati 2013 General Plan EIR determined that construction activities from buildout of the General Plan could result in periods of significant ambient noise levels and groundborne vibration. As outlined below, General Plan action items relevant to the proposed Project include Actions N 1c and N 1h. Action N 1 requires an acoustical study for all new discretionary projects and Action N 1h contains suggested “best practices” for control of construction noise. In compliance with these action items identified in the 2013 General Plan EIR, a Noise and Vibration Analysis was prepared for the Project (**Appendix H**).

Construction activities would include site preparation work such as grading and the installation of utilities, foundation work, and new building framing and may generate groundborne vibrations. Construction techniques that generate the highest vibration levels, such as impact or vibratory pile driving, are not expected. Policy N 1.15 of the City's General Plan limits construction vibration levels to 0.08 in/sec PPV for sensitive historical structures and to 0.3 in/sec PPV for normal conventional buildings to limit cosmetic damage. According to the Noise Analysis provided by Illingworth and Rodkin, each piece of construction equipment has a different level of vibration and in order to meet the 0.3 in/sec PPV, a minimum distance of anywhere from less than one foot to 19 feet would be needed. All buildings (existing and approved) would be 40 feet or more from the nearest project site boundary and most large vibration-inducing equipment would be 10 feet or more from the property lines. Therefore, vibration levels would be less than 0.1 inch/second PPV at all surrounding off-site buildings and the project would not substantially increase the severity of the significance of impacts nor would it result in new significant impacts relative to the 2013 General Plan EIR.

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

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

2013 General Plan EIR Mitigating Policies and Actions

Policy N 1.2: Require development and infrastructure projects to be consistent with the Land Use Compatibility for Community Noise Environments standards indicated in General Plan Table N-1 (EIR Table 3.10-9) to ensure acceptable noise levels at existing and future uses.

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

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

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

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

Status: Illingworth & Rodkin, Inc prepared a Noise and Vibration Assessment for the proposed Project (**Appendix H**) on December 20, 2024. The study addressed the existing and future noise environment with respect to the requirements of the City of Cotati General Plan and Cotati Municipal Code and proposed noise attenuation measures, which are imposed as Conditions of Approval. As such, the Project complies with this action.

Action N 1h: During the environmental review process, determine if proposed construction will constitute a significant impact on nearby residents and require mitigation measures in addition to the standard “best practice” controls. Suggested “best practices” for control of construction noise:

- Construction period shall be less than twelve months.
- Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm on weekdays and 9:00 am and 5:00 pm on Saturdays (if allowed through specific project conditions of approval). No construction shall occur on Sundays or holidays.

- All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
- The construction contractor shall utilize “quiet” models of air compressors and other stationary noise sources where technology exists.
- At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences.
- Unnecessary idling of internal combustion engines shall be prohibited.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- The required construction-related noise mitigation plan shall also specify that haul truck deliveries are subject to the same hours specified for construction equipment.
- Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing.
- The construction contractor shall designate a “noise disturbance coordinator” who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures as warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.

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

Conclusion and Environmental Conditions of Approval:

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

NOI-1: Prior to issuance of the building permit, the applicant shall submit final design plans and an acoustical analysis prepared by a qualified acoustical engineer demonstrating that the design incorporates adequate controls to reduce interior noise levels to 45 dBA Ldn or lower within residential units. The acoustical engineer shall verify that appropriate building construction techniques required to meet the interior noise standard, which may include sound-rated windows

and doors, sound-rated wall constructions, and acoustical caulking are installed in a manner that achieves 45 dBA Ldn.

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

1. Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm on weekdays and 9:00 am and 5:00 pm on Saturdays. No construction shall occur on Sundays or holidays.
2. All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
3. The construction contractor shall utilize “quiet” models of air compressors and other stationary noise sources where technology exists.
4. At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences.
5. Unnecessary idling of internal combustion engines shall be prohibited.
6. Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
7. Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing.
8. The construction contractor shall designate a “noise disturbance coordinator” who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures as warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.
9. The contractor shall construct a solid plywood fence along the western and northwestern property lines to shield the adjoining future (if applicable) and existing residential receptors from construction work. A temporary 8-foot-tall noise barrier would be tall enough to block direct line-of-sight with ground-level receptors and reduce noise levels generated by large earthwork equipment by a minimum of 4 dBA.

5.14. POPULATION AND HOUSING

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

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

2013 General Plan EIR Findings

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

- Impact 3.9--5: General Plan implementation has the potential to induce substantial population growth. Through implementation of General Plan policies and actions intended to guide growth to appropriate areas and limit land uses allowed under the proposed General Plan, population and housing growth associated with the proposed General Plan would result a less than significant impact.
- Impact 3.9--6: General Plan implementation does not have the potential to displace substantial numbers of people or existing housing. The General Plan could result in development that would remove residences, but the development allowed under the General Plan would result in an increase in the total number of residences and provide housing opportunities for persons that may be displaced as a result of development. This provision of replacement "housing opportunities" is essentially a self-mitigating aspect and implementation of the General Plan and would have a less than significant.

The City of Cotati 2013 General Plan EIR determined that the 2030 General Plan would accommodate approximately 2,140 new residential units within the City Limits and the Sphere of Influence through 2035. This new growth would increase the Planning Area's population by approximately 5,243 residents. The population in Cotati in 2013 was estimated at 7,310 in the 2013 General Plan EIR. The proposed General Plan is intended to accommodate the City's fair

share of statewide housing needs, which are allocated by the Association of Bay Area Governments.

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

Project Consistency with the 2013 General Plan EIR

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

The City of Cotati has an existing population of approximately 7,584 residents¹⁰ which is only slightly more than the population in 2010 (7,2650 and the City has not reached the growth planned in the 2013 General Plan (an additional 5,243 residents). The Project would result in the construction of 178 rental units. The estimated population increase would be approximately 484 persons,¹¹ which is within the planned growth in the 2013 General Plan EIR.

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

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

The Project site is located within the City limits and contains no existing residences. As such, the proposed Project would not displace a substantial number of people or existing housing that would require the construction of replacement housing elsewhere. Therefore, Project impacts related to the displacement of housing or people would not exceed those analyzed in the City of Cotati 2013 General Plan EIR and the Project will not substantially increase the severity of the significance of impacts nor would it result in new significant impacts relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

¹⁰ City of Cotati, Housing Element 2023-2031, certified on November 18, 2022.

¹¹ Based on the City's Housing Element 2023-2031 estimate of 2.72 persons per household in Cotati.

Conclusion and Environmental Conditions of Approval:

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

5.15. PUBLIC SERVICES

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; and Memorandum from Rancho Adobe Fire Protection District prepared on October 29, 2024.

2013 General Plan EIR Findings

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

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

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

Project Consistency with the 2013 General Plan EIR

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

The Project site is served by the Rancho Adobe Fire Protection District (RAFD). The RAFD was formed in 1993 through the combining of two smaller districts, the Cotati Fire Protection District and the Penngrove Fire Protection District. The RAFD provides services to the Penngrove, Cotati, and unincorporated areas of Petaluma. RAFD covers an emergency response area of roughly 86 square miles and serves approximately 28,000 people. Service is provided by three stations located at 1 East Cotati Avenue; 11000 Main Street in Penngrove, and 99 Liberty Road in Petaluma. Currently, there are 13 full-time Firefighters, Engineers and Captains; three Battalion Chiefs; 24 part-time Firefighters; one part-time Fire Chief; and one Administrative Manager.¹²

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

The Project proposes to install new water mains onsite that will be sized according to City standards that would connect to existing water main on SR-116. The system is required to comply with the standards of the California Fire Code (CFC) as referenced in the City of Cotati Municipal Code Section 14.04.110. The Project proposes new fire hydrants on site, the final number and location of which would be subject to review and approval by RAFD. Project plans have been reviewed by the RAFD and as noted in the Memo prepared on October 29, 2024, a final review and approval is contingent on the implementation of conditions required for compliance with uniform standards in the California Fire Code.

¹² Rancho Adobe Fire Protection District Website, <https://www.rafd.org/about-rancho-adobe-fire-protection-district> accessed on December 30, 2024.

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

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

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

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

The proposed Project involves the construction of 178 dwelling units, which could increase student enrollment within the Cotati-Rohnert Park Unified School District (CRPUSD). The CRPUSD includes eight elementary schools, two middle schools, and two high schools. The 2022-2023 total enrollment within the CRPUSD was 6,067 students. The CRPUSD has a capacity to serve approximately 7,444 students;¹³ therefore, the school district can accommodate up to 1,377 more students.

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

2013 General Plan EIR Mitigating Policies and Actions

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

Status: In accordance with City processing procedures, the application was routed to the Police Department for input. The Police Department reviewed the site plans and found them adequate for police protection purposes. As a Tentative Map Condition of Approval, the Community Development Department requires the applicant to annex into the Community Facilities District, which covers the

13 Cotati-Rohnert Park Unified School District, Facilities Plan Presentation prepared by Quattrocchi Kwok Architects on August 20, 2024 <https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030608&AID=874303&MID=31064>

cost of public facilities and services including police services. Through the implementation of the Tentative Map Condition of Approval, the Project complies with Action CSF 2q and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

Conclusion

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

5.16. RECREATION

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015. California State Parks Community FactFinder Report pulled from State of California Department of Parks and Recreation website on December 30, 2024.

2013 General Plan EIR Findings

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

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

Quimby Act

The Quimby Act (California Government Code Section 66477) states that “the legislative body of a city or county may, by ordinance, require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative or parcel map.” The Quimby Act seeks to preserve open space needed to develop parkland and recreational facilities; however, the actual development of parks and other recreational facilities is subject to discretionary approval and is evaluated on a case-by-case basis with new residential development.

Chapter 17.76.030 of the Cotati Municipal Code provides for the dedication of land and/or the payment of fees to the City for park and recreational purposes as a condition of the approval of a tentative map, as authorized by the Quimby Act. As a standard condition of tentative map approval,

applicants are required to dedicate land and/or pay a fee at the discretion of the City Council for the purpose of developing new or rehabilitating existing park or recreation facilities to serve the subdivision. The Municipal Code requires that one acre of property for every 200 persons residing within the City be devoted to neighborhood and community park and recreational purposes.

Project Consistency with the 2013 General Plan EIR

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

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

The Project is subject to Municipal Code 17.76.030 Park land dedications and fees which implements the Quimby Act. Using the formula in 17.76.030(C)(2), the applicant would be required to provide 2.1 acres of parkland. two new public parks onsite that will add approximately 47,210 square feet (1.08 acres) of improved parkland. This does not meet the total parkland required by Cotati Municipal Code 17.76.030(C)(2). Therefore, **COA REC-1** requires the applicant to provide the remaining balance of parkland or pay an in-lieu fee in accordance with Municipal Code Section 17.76.030(D).

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

2013 General Plan EIR Mitigating Policies and Actions

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

Status: The Project will result in an estimated 484 new residents. The site is located in an area where there is a ratio of 0.65 acres parkland per 1,000 residents. The Project proposes two new public parks onsite that will add approximately 47,210 square feet (1.08 acres) of improved parkland. **COA REC-1** requires that the applicant dedicate additional parkland or pay an equivalent in-lieu fee in compliance with Cotati Municipal Code Section 17.76.030. As conditioned this Project complies with Action OS-2a and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

Conclusion and Environmental Conditions of Approval

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

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

REC-1: The applicant shall provide the remaining balance of parkland in compliance with Municipal Code Section 17.76.030(C) or pay an in-lieu fee in accordance with Municipal Code Section 17.76.030(D) and as approved by the Planning Director.

5.17. TRANSPORTATION

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Technical Advisory on Evaluating Transportation Impact in CEQA, prepared by the California Office of Planning and Research, December 2018; Cotati Active Transportation Plan, prepared by Sonoma County Transportation Authority for the City of Cotati, adopted May 14, 2024; Guidelines for Analysis of Vehicle Miles Traveled, adopted by City of Cotati September 22, 2020; Memorandum from Rancho Adobe Fire Protection District prepared on October 29, 2024; and Traffic Impact Study for the Redwood Row Project, prepared by W-Trans, April 4, 2025.

2013 General Plan EIR Summary

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

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

- Impact 3.12-2: General Plan buildout as well as regional growth would require improvements on Gravenstein Highway, a Caltrans facility. Because the City does not control the funding or timing of these improvements, the City cannot determine that the improvements will be made in time to accommodate regional and local growth. Implementation of mitigating General Plan Policies CI 1.1, CI 1.2, CI 1.3, CI 1.5, CI 1.7, CI 1.20, CI 3.2, CI 3.3, CI 3.4, CI 4.1, CI 4.3, - CI 4.7 and Actions CI 1a, CI 1b, CI 1e- CI 1g, CI 1o- CI 1r, CI 3b, and CU 4a would not sufficiently mitigate the lack of a regional fee program, or other Identified source of funding. As such, implementation of the General Plan would result in a significant and unavoidable impact and no further mitigation is available.
- Impact 3.12-3: General Plan implementation would contribute to unacceptable operation on US 101 freeway facilities. The Metropolitan Transportation Commission, County of Sonoma, City of Cotati, and SCTA recognize that US 101 will experience congestion into the foreseeable future, and that there will be no further major capacity enhancements such as expansions or new freeways. Implementation of the mitigating General Plan Policies CI 3.2 – CI 3.4, CI 4.1, CI 4.4, CI 4.6, CI 4.7, LU 2.5, LU 2.10, LU 3.8, and Actions CI 3b and CI 4a would not reduce the impacts to less than significant levels and implementation of the General Plan would result in significant and unavoidable impacts.
- Impact 3.12-4: The proposed General Plan would not conflict with an applicable congestion management program. As of the writing of the 2013 General Plan EIR, there was no congestion management program for Sonoma County or the City of Cotati. As such, implementation of the General Plan would have no impact.
- Impact 3.12-5: The proposed General Plan would not result in a change in air traffic patterns. The City has no existing or planned airport facilities and is not located near any airports, approach, or departure zones. As such, the General Plan would have no impact.
- Impact 3.12-6: Implementation of the proposed General Plan would not substantially increase hazards due to a design feature. Development and infrastructure projects in Cotati would be required to comply with the General Plan, Land Use Code, and applicable state and local regulations. Through the implementation of the mitigating General Plan Policies CI 1.8, CI 1.9, CI 1.18, and CI 1.24 and Actions CI 1j, CI 1l, CI 1m, CI 1r, and CI 2f, implementation of the General Plan would result in a less than significant impact.
- Impact 3.12-7: Emergency Access. Through the implementation of the mitigating General Plan Policies CI 1.10, CI 1.14, CI 1.16 and Actions CI 1r, implementation of the General Plan would not impede emergency access and would result in a less than significant impact.
- Impact 3.12-8: The proposed General Plan would accommodate increased demand for public transit and supports a shift in trips from automobile to transit modes. Through the implementation of the mitigating General Plan Policies CI 1.6, CI 2.14 – CI 2.22, and CI 3.2 and Actions CI 2i – CI 2k, implementation of the General Plan would have a less than significant impact.
- Impact 3.12-9: The proposed General Plan is consistent with adopted bicycle and pedestrian plans and supports enhancements that emphasize bicycle and pedestrian circulation.

Through the implementation of the mitigating General Plan Policies CI 1.2, CI 1.6, CI 1.9, CI 1.11, CI 1.12, CI 1.17, CI 1.19, CI 1.20, CI 1.21, CI 2.1-CI 2.13, CI 2.23, and CI 2.24, and Actions CI 1a, CI 1m, CI 1n, CI 1p – CI 1r, CI 2a – CI 2d, CI 2f – CI 2h, and CI 2l – CI 2o, implementation of the General Plan would have a less than significant impact.

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

Level of Service to Vehicle Miles Traveled (SB 743)

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

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

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

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

Public Transit

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

The project site is located along Sonoma County Transit Bus Route 26 which provides service between Sebastopol, Cotati, and Rohnert Park with a stop at the Cotati SMART Station. An unimproved bus stop is located about 100 feet southeast of the Project site near the intersection of SR-116 and Redwood Ave. for westbound passengers. An unimproved bus stop serving eastbound passengers is located across SR-116.

Rail Service

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

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

The Cotati SMART station is located approximately 1.7 miles from the site.

Bike and Pedestrian Facilities

This Cotati Active Transportation Plan (ATP) was developed as a component of the Sonoma County Transportation Authority's (SCTA's) 2024 Countywide Active Transportation Master Plan and was adopted by the City Council on May 14, 2024. While part of the Master Plan, the City of Cotati's ATP is also a stand-alone document to be used by the City of Cotati to guide implementation of local projects and programs and document city policy. It is also designed to be a component of the SCTA Countywide Active Transportation Master Plan to improve coordination in realizing the countywide bicycle and pedestrian system.

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

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

- Foster cooperation between entities for planning purposes and to create Geographic Information System (GIS) maps and a database of existing and proposed facilities countywide.

City of Cotati Local Roadway Safety Plan (2021)

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

Vision Zero Action Plan (2022)

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

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

Sonoma County Comprehensive Transportation Plan

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

Projects identified in Moving Forward 2050 relative to Cotati include: updating the US 101 and Railroad Avenue Interchange; widening and rehabilitation of SR-116 between US 101 and Stony Point Road and the addition of signalized intersections, new bike lanes, and new sidewalk to improve the vehicle LOS,

improve the safety of SR-116 for all modes of transportation, and create safe new corridors for pedestrian and bicyclists; Bicycle and pedestrian upgrades (citywide); constructing sidewalks along west Cotati Avenue to close gaps; US 101/SR-116 north bound on-ramp improvements; Multimodal streetscape improvements joining all four legs of La Plaza Street around La Plaza Park; widening Old Redwood Highway for safer bike lanes, sidewalks, and center island medians; US 101/West Sierra Avenue south bound off-ramp improvements; and local street pavement rehabilitation from La Plaza to Gravenstein Highway.

Project Consistency with the 2013 General Plan EIR

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

The Traffic Impact Study (TIS) was completed by W-Trans on April 4, 2025. The study analyzes 178 multi-family housing units and 10,032 square feet of commercial space.

The proposed Project includes the creation of an internal network of roads and driveways that will be accessed from two connections with SR-116. One new entrance matches the proposed new alignment of West Cotati Avenue and SR-116, which is planned to be a signalized intersection at full buildout and is consistent with the City's General Plan Policy 1.19 which requires effective linkages to the surrounding circulation system. An emergency vehicle access (EVA) is proposed from SR-116 at the southeastern corner of the site.

Parking

The Project incorporates 400 parking spaces including 268 garaged spaces to serve the townhomes, 34 guest parking spaces, 57 to serve the apartment building, and 41 spaces for the commercial space. Using the standards in the City's Land Use Code Section 17.36.050 Number of Parking Spaces Required, the project would be required to provide 201 spaces for the townhouses, 56 spaces for the apartment building, 44 guest spaces, and 41 commercial spaces. However, through the application of State Density Bonus Law, the project is only required to provide 41 commercial spaces, 201 spaces for the townhouse units, 56 spaces for the apartment units, and no guest units are required. Through application of State Density Bonus Law the project is in compliance with the required number of parking spaces.

Level of Service

General Plan Circulation Element Policy CI 1.3 calls for a minimum level of service (LOS) standard of LOS D at intersections. The TIS analyzed traffic operations along the project frontages on and Alder Avenue, as well as the intersections of SR-116 at Alder Avenue, West Cotati Avenue, and a proposed future north-south street to be constructed west of Locust Avenue to determine the level of service under the existing conditions, existing conditions plus project conditions, baseline (existing plus approved projects), baseline plus project, future, and future plus project conditions at weekday morning peak hour and weekday afternoon peak hour. The analysis found that the Project would result in the generation of an average of 1,558 trips per day including 85 a.m. peak hour trips and 116 p.m. peak hour trips. The results of the LOS analysis are summarized in Table 5.11, Table 5.12, and Table 5.13 below.

Table 5.11: Existing and Existing plus Project Peak Hour Intersection Levels of Service

	Existing				Existing + Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. SR-116/W. Cotati Ave.	0.5	A	0.9	A	0.5	A	0.9	A
Northbound Approach	<i>18.1</i>	<i>C</i>	<i>17.7</i>	<i>C</i>	<i>18.4</i>	<i>C</i>	<i>18.2</i>	<i>C</i>
Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in italics.								
Source: Transportation Impact Study, prepared by W-Trans, February, 6, 2025								

Table 5.12 Baseline and Baseline plus Project Peak Hour Intersection Levels of Service

	Baseline				Baseline + Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
SR-116/W Cotati Ave	0.5	A	0.9	A	0.5	A	0.9	A
Northbound Approach	<i>19.3</i>	<i>C</i>	<i>18.7</i>	<i>C</i>	<i>19.6</i>	<i>C</i>	<i>19.3</i>	<i>C</i>
Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in <i>italics</i> , shaded cells indicated conditions with recommended improvements (as conditioned)								
Source: Transportation Impact Study, prepared by W-Trans, April 4, 2025								

Table 5.13 Future and Future plus Project Peak Hour Intersection Levels of Service

	Future				Future + Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
2. SR-116/W Cotati Ave	12.0	B	33.7	C	16.1	B	36.9	D
Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service								
Source: Transportation Impact Study, prepared by W-Trans, April 4, 2025								

The study intersections would be able to continue operating within the LOS D standard which is consistent with Policy C1.3, when considering trips from the Project, existing traffic, other pending and approved projects, and anticipated future volumes.

Bicycle & Pedestrian Facilities

The Project proposes the construction of a Class I Multiuse Path serving bicyclists and pedestrians. The facility provides a pedestrian and bicycle circulation extension from the existing sidewalks and bike lane on Alder Avenue. The Cotati Bike and Pedestrian Master Plan indicates that the portion of SR-116 in front of the Project site was planned for a Class II Bike Plan, and the Project proposal for a Class I facility is an improvement that provides physical separation from vehicular traffic.

The Project provides bicycle parking to meet minimum municipal code requirements. As required by Cotati Municipal Code Section 17.36.070, a ratio of one space per ten motor vehicle spaces is required for new development. This would require 33 bicycle parking spaces for the project. The Project plans

indicate that one bicycle parking space is provided for each townhome (located within the garage). However, this would not provide bicycle parking for the public park, apartment building, or the commercial spaces. In order to ensure that adequate bicycle parking is provided for all uses on site, final project plans, as conditioned under **COA TRA-1**, would be required to provide bicycle parking spaces for the apartment building (6 spaces), public park (4 spaces), and the commercial development (4 spaces) that meet minimum requirements of Section 17.36.070.

Transit

Bus stops are located within an acceptable walking distance of the Project site which is served by Sonoma County Transit Routes 10, 26, and 48 and Golden Gate Transit Route 101 NB/SB. Route 26 stops at the intersection of Hwy 116 and Redwood Drive making one trip in each direction per weekday. Routes 10, 48, and 101 NB/SB stop at Old Redwood Highway and St. Joseph way which is approximately 0.6 miles from the Project site. The project would not be expected to negatively impact transit operations and existing transit routes are adequate to accommodate project-generated transit trips. The addition of the Class I path along SR-116 will connect to adjacent pedestrian facilities, providing connectivity to bus stops in the area.

The California Department of Transportation (Caltrans) provided comments upon review of the project referral. Caltrans comments stated that any improvements on SR-116 would need to comply with Caltrans Standards in the Highway Design Manual. Therefore, **COA TRA-2** requires the applicant to secure an encroachment permit during which the final public improvement plans will be reviewed and approved by Caltrans.

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

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

The Traffic Impact Study (**Appendix I**) for the Project analyzed the estimated Vehicle Miles Traveled (VMT) that would be generated by the Project. The City uses a VMT threshold of fifteen percent (15%) below the existing baseline city residential VMT per capita. Based on the Sonoma County Transportation Authority model, the baseline average residential VMT for Cotati is 18.3 miles per capita and 15 percent below this value provides a significance threshold of 15.6 miles per capita. The Project is located in Traffic Analysis Zone (TAZ) 425, which has a baseline VMT per capita of 20.2 miles. For the Project to be below the significance threshold of 15.6 per capita, VMT would need to be 22.8 percent lower than the average for the TAZ. As analyzed in the Traffic Impact Study, the Project proposes high density residential development, which is associated with lower VMT per capita compared to conventional single-family development and has a project-specific rate of 15.3 vehicle miles traveled per capita. Therefore, the project would be 24.3 percent lower than the average VMT for the TAZ and would be less than significant.

City VMT guidelines indicate a retail project resulting in a net increase in regional total VMT is considered to have a significant VMT impact. The Project would contain approximately 10,032 square feet of commercial space. While this is 32 square feet (0.3 percent) higher than the City's small screening threshold for local-serving retail projects, based on the location of the site, it is expected that these retail uses would be local-serving and would therefore not generate new regional trips, as

they would primarily cater to residents of Cotati as well as pass-by traffic from US 101 and SR-116. Since the proposed retail uses would be local-serving, it is assumed that they would not result in an increase in total VMT and are therefore be screened from a further VMT analysis.

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

5.17I(c,d) (Geometric Design Feature Hazard, Emergency Access) - No Substantial Change Relative to the General Plan EIR

The Project will not result in inadequate emergency access or introduce geometric design hazards. The site is located just west of the intersection of Redwood Drive and SR-116. The Project site's primary access would be from SR-116 via two new access driveways. A separate access to the project site via SR-116 is proposed for emergency vehicle access (EVA) only. The access driveways, EVA, and frontage improvements would be built to City standards. The site layout has been reviewed by the City's Engineering Division and the Rancho Adobe Fire Protection District (RAFD), which provides fire protection services to the City, for evaluation of preliminary design with regards to design standards and adequate emergency access. The standard review process of approval which is required by the RAFD includes uniformly applied requirements for emergency access.

Sight distances at locations where the Project would create connections to SR-116 were evaluated in the Transportation Impact Study and found to be adequate. From the proposed northern segment of W. Cotati Avenue, the proposed intersection of W. Cotati/SR-116 has a minimum corner sight distance of 495 feet based on its 45-mph speed limit. The eastern driveway to the project at SR-116 has a minimum sight distance of 360 feet. Site distances in each direction are 550 feet and would be adequate provided that site lines are kept clear of obstructions within the sight triangle. To ensure minimum sight lines are kept free of obstructions, **COA TRA-3** has been imposed.

Further, the project was evaluated to determine whether a left-turn lane was warranted on SR-116 at the Project access points. Prior to the realignment of the SR-116/West Cotati Avenue intersection, the primary access point for eastbound vehicles on SR-116 would be at the eastern project driveway where a left-turn pocket is to be provided. Once the intersection is reconstructed, vehicles heading eastbound on SR-116 would enter the site from a dedicated turn lane at the signalized intersection of W. Cotati Ave and SR-116. Upon completion of the W. Cotati realignment, a center median will prevent left-turn lanes into the project from the eastern driveway which will only accommodate right-turn in and right-turn out travel. However, in the event that the proposed Redwood Row project will be completed and operational prior to construction of the W. Cotati Realignment, **COA TRA-4** requires the installation of a dedicated left-turn lane with a minimum of 50 feet of storage.

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

2013 General Plan EIR Mitigating Policies and Actions

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

Status: The proposed Project would not result in any intersections falling below the required minimum standard of LOS D and is consistent with this policy.

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

Status: The proposed Project will include the development of a Class I Multiuse Path that would serve pedestrians and bicyclists and connect to the existing sidewalk to the east of the site and the planned pathway to the west of the site. As conditioned by **COA TRA-3**, the Project will maintain clear sight lines and is consistent with this policy because it will help ensure pedestrian safety at project intersections. Additionally, **COA TRA-4** requires a dedicated left-turn lane to comply with Highway Design Standards in the interim condition prior to completion of the planned W. Cotati Avenue realignment. As conditioned, the project is consistent with this policy.

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

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

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

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

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

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

Action CI 1q: As part of the development review process, require new development to mitigate circulation impacts by making improvements to the motorized and non-motorized circulation

networks as necessary, and in a fair manner with an established nexus between the level of impact and required improvements and/or contributions.

Status: The Project design and **COA TRA-1, TRA-2, TRA-3, & TRA-4** provide necessary frontage improvements along SR-116, and internal to the project site to address the potential circulation impacts from the project. As conditioned, the Project is consistent with this policy.

Conclusion and Environmental Conditions of Approval:

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

TRA-1: Final Project plans shall show the location and details of proposed bicycle parking on site based on final vehicular parking space counts and consistent with the requirements of Cotati Municipal Code Section 17.36.070.

TRA-2: Prior to commencing public improvements or construction of frontage improvement and access point along SR-116, the applicant shall secure an encroachment permit from Caltrans and provide a copy of the permit to the Community Development Department.

TRA-3: Final design and landscaping plans shall be submitted and show compliance with Municipal Code Section 17.30.040(c)(2). Final landscaping plans shall include the specific plants that will be placed in the traffic safety visibility area and their maximum projected height which shall be no taller than 36 inches except for trees with their canopy trimmed to a minimum of eight feet above grade. These standards shall be applied to intersections between the multi-use path and any intersecting streets or driveways.

TRA-4: If Project occupancy occurs prior to the realignment of W. Cotati/SR-116 project, an eastbound left-turn lane on SR-116 with a minimum of 50 feet of storage shall be provided at the eastern project driveway, subject to review and acceptance by the City Engineer.

5.18. TRIBAL CULTURAL RESOURCES

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Cultural Resource Evaluation of the Proposed Redwood Drive Project in Cotati, prepared by Archaeological Resource Management on October 10, 2024; AB 52 Project Notification dated November 15, 2024; and Cultural Resources Addendum for the Proposed Redwood Row Project prepared by Evans & De Shazo on March 14, 2025.

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

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

2013 General Plan EIR Findings

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

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

Project Consistency with the 2013 General Plan EIR

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

In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the Federated Indians of Graton Rancheria (FIGR) on November 15, 2024, which included a brief description of the proposed Project and its location, the City of Cotati contact information, and a notification that the Tribes have 30 days to request consultation. A written request for consultation, dated December 3, 2024, was received from FIGR; and the City initiated consultation with the Tribe and provided a cultural resources evaluation to the tribe on December 5, 2024. A meeting was requested and scheduled for January 27, 2025. Subsequent correspondence resulted in a request from the Tribe to conduct additional studies of the site.

As requested during consultation with the Federated Tribes of Graton Rancheria, a Historical Human Remains Detection Canine Survey (HHRCD) was completed on March 5, 2025 and a report was prepared by Evans and Deshazo on March 14, 2025. The site was divided into 11 search areas, and each was searched by two or more dogs.

The HHRCDC concluded that intact burials are not likely present; however, fill soil deposits have the potential to contain resources. In order to ensure that no human remains nor potential grave sites are disturbed, **COA CUL-1**, **CUL-2**, and **CUL-3** have been established to require tribal monitoring, post-review archaeological discoveries, and protocol in the event of the discovery of human remains.

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

2013 General Plan EIR Mitigating Policies and Actions

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

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

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

Status: In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the tribes on November 15, 2024, which included a brief description of the proposed Project and its location, the City of Cotati contact information, and a notification that the Tribes have 30 days to request consultation. Notified tribal organizations include the Federated Indians of Graton Rancheria. A written request for consultation, dated December 3, 2024, was received from the Federated Indians of Graton Rancheria; and the City initiated consultation with the Tribe and provided an archaeological report to the tribe on December 5, 2024. Consultation included a meeting between the City and the Tribe on January 27, 2025 and subsequent correspondence. The Tribe requested that supplemental investigation for potentially buried artifacts be conducted. This included subsurface and canine investigations. Canine investigations were completed on March 5, 2025 and additional conditions were added to protect potential Tribal Cultural Resources on the site. The draft report and conditions were sent to the Tribe for review on March 19, 2025. Follow-up communication was sent to the tribe on April 2, 2025 and on April 9, 2025 and the City notified the tribe that the City considered the tribal consultation satisfied. As such, the Project complies with these policies.

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

Status: **COA CUL-2** and **CUL-3** require the implementation of the protocol consistent with Action CON 4c. As such, the Project complies with this policy.

Conclusion and Environmental Conditions of Approval:

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to tribal cultural resources relative to what was

identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The implementation of **COA CUL-1, CUL-2, and CUL-3** (see Cultural Resources section) are required to implement the 2013 General Plan EIR mitigating policy.

5.19. UTILITIES AND SERVICE SYSTEMS

Would The Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; City of Cotati Municipal Code; Sonoma County Water Agency 2020 Urban Water Management Plan prepared by Brown and Caldwell, June 2021; Public Works Draft Conditions of Approval Memo prepared on March 11, 2025; and Redwood Row Water and Wastewater Assessment Report prepared by Carollo on February 13, 2025.

2013 General Plan EIR Findings

The 2013 General Plan EIR evaluated potential impacts to Utilities and Service Systems in Chapter 3.13 and determined the following:

- Impact 3.13-1: General Plan implementation has the potential to result in an increased demand for water supplies. However, through implementation of mitigating General Plan

Policies CSF 1.1-1.6, CSF 2.1- CSF 2.1 and Actions CSF 1a, CSF 1b, CSF 2b- CSF 2g, implementation of the General Plan would have a less than significant impact.

- Impact 3.13-2: General Plan implementation would not result in the construction of a new water treatment facility or expansion of existing facilities, which could cause significant environmental effects because the projected 2035 water supplies are adequate to meet demand that would be generated by buildout of the 2013 General Plan.
- Impact 3.13-3: General Plan implementation has the potential to exceed wastewater capacity or the requirements of the RWQCB. Upon full buildout of the 2013 General Plan within the City limits, total ADWF is projected to be 0.74 mgd. Within the entire Planning Area, the ADWF would be 0.83 mgd upon full buildout of the General Plan. These ADWF projections exceed the projections used in the 2011 Sewer Collection System Master Plan. Even with mitigating General Plan Policies CSF 1.1-CSF 1.6 and CSF 2.16 – CSF2.27 and Actions CSF 1a, CSF 1b, CSF 2h-2n, implementation of the General Plan would result in a cumulatively considerable significant and unavoidable impacts.
- Impact 3.13-4: General Plan implementation has the potential to require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Through the implementation of mitigating Policies CSF 2.20, CSF 2.22, and CSF 2.24 implementation of the 2013 General Plan would have a less than significant impact.
- Impact 3.13-5: General Plan implementation would be served by a landfill for solid waste disposal needs and will require compliance with various laws and regulations. Through implementation of the mitigating General Plan Policies CSF 3.1-CSF 3.8 and Actions CSF 3a-CSF 3e, implementation of the 2013 General Plan would have a less than significant impact.
- The City of Cotati adopted the Findings of Fact and Statement of Overriding Considerations on March 24, 2015, including for the significant and unavoidable impacts identified for utilities and service systems (Impact 3.13-3). The City findings determined that despite the significant and unavoidable impact to utilities and service systems, no other project alternative would meet the City's objective to realize the development potential of undeveloped lands for residential, office, and commercial uses necessary for housing opportunity and job growth.

Project Consistency with the 2013 General Plan EIR

5.19(a) (Relocation or Expansion of Utilities) – No Change Relative to the General Plan EIR

As stated in Section 5.14 Population and Housing, the Project is not anticipated to induce substantial growth in the area, either directly or indirectly. However, the increase in residents, which is estimated to be 484 new residents, will incrementally increase the demand for water supplies, wastewater treatment, and solid waste disposal.

The Project site is located within City limits and is currently served by existing utilities and service systems. New service connections will be required to tie into the existing facilities, which are located on SR-116 and the northern corner of the property. A Water and Wastewater Assessment Report was prepared by Carollo on behalf of the City of Cotati and stamped on February 13, 2025 (**Appendix J**). The report concludes that the existing 21-inch gravity pipeline in Redwood Drive has sufficient capacity to convey the wastewater flows from the project. The existing water system is deficient in supply, storage, and in relation to low pressures. However, the City's Capital Improvement Program (CIP) addresses these deficiencies and through the collection of impact, connection, and service fees, the City will implement the upgrades which, when complete, will be sufficient to serve the project. As the project is subject to impact fees that and would not require additional improvements beyond those planned in the 2011 Water Distribution System Master Plan (WDSMP) or the 2017 Sewer Master Plan Update (SMPU), the project would not require the relocation or expansion of infrastructure.

Therefore, the Project will not result in the relocation, construction, or expansion of utilities, and as such will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.19(b) (Sufficient Water Supplies) – No Substantial Change Relative to the General Plan EIR

The Project would generate water demand consistent with the buildout projections of the General Plan. The City of Cotati receives potable water supplies through a contract with Sonoma Water, the regional wholesale water provider. Water supplies provided by Sonoma Water are sourced principally from the Russian River to eight water contractors, other water transmission system customers, and to the Marin Municipal Water District (Marin Water). Sonoma Water prepared an Urban Water Management Plan (Plan) in 2020 that addresses the water transmission system and includes a description of the water supply sources, historical and projected water use, and a comparison of water supply to water demands during normal, single-dry, and multiple-dry years.

The Sonoma Water UWMP estimates that 592 acre feet of potable water supplies were provided to the City of Cotati in 2020 and that deliveries to Cotati will increase to 1,215 acre feet per year by 2045. The Sonoma Water UWMP concludes that that potable water demand for all users, including the City of Cotati, is well within the available supply, during normal water years for cumulative demand through 2045. Sonoma Water has adequate water supplies through the 2045 planning horizon, except for single-dry years, starting after 2025. During single dry years Sonoma Water works with all wholesale customers to reduce water usage in accordance with the Water Shortage Contingency Plan set forth in the UWMP.

The City of Cotati Municipal Code Chapter 13.30 Water Shortage Contingency Plan contains provisions for water conservation during water shortages. Through the implementation of these actions, the City reduces water usage during drought years to ensure sufficient resources to adequately serve all customers in accordance with the requirements of the UWMP.

The City of Cotati is responsible for distributing water to residential consumers and through the WDSM, plans for the supply, storage, and distribution of water to properties located in the service area. The

At the project level, the Water and Wastewater Assessment (**Appendix J**) anticipated the average daily demand for water generated by the project to be approximately 49,914 gallons per day (gpd). As the existing system is deficient, the project would contribute to the deficiency. However, through the projects planned in the 2011 WDSM and the 2017 SMPU, the system would provide sufficient supply,

storage, and distribution for the City's planned growth including the project. The City's Capital Improvement Program (CIP) implements the water and sewer upgrades planned through the WDSM and SMPU. The CIP is funded through impact fees, water connection fees, and service fees. Impact and connection fees paid by the project would support the implementation of planned improvements necessary to serve all City of Cotati customers, including the Project.

Further, the Project is required to incorporate water efficient development standards consistent with all applicable State and Cotati municipal code requirements. The Project is required to adhere to the Water Conservation Ordinance contained in Chapter 13.30 of the City of Cotati Municipal Code. Additionally, the Project is subject to Municipal Code Chapter 17.34, which requires compliance with standard water efficient landscaping standards. **COA UTI-1** requires that final plans showing incorporation of water efficiency requirements be submitted and confirmed prior to building permit issuance. Therefore, the water supplies are sufficient to meet existing water demands of the project and other existing and planned future water users during normal, single, and multiple dry year scenarios.

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

5.19(c) (Wastewater Capacity) – No Substantial Change Relative to the General Plan EIR

The 2013 General Plan EIR concluded that even with implementation of the policies and action items in the General Plan, an increase in permitted capacity at the Laguna Wastewater Treatment Plant cannot be guaranteed, and impacts were considered cumulatively considerable, and significant and unavoidable. As part of the development review process, the City Engineer of the City of Cotati reviewed the Project for adequacy and compliance of the Project with the City's sewer system requirements and compliance with the City of Cotati Sewer Collection System Master Plan, Urban Water Management Plan, and Water Distribution System Master Plan.

A Water and Wastewater Assessment was prepared for the Project (**Appendix J**) that anticipated the average daily wastewater generation to be approximately 39,294 gallons per day (gpd) and peak flow to be 70,347 gpd. The Report determined that the updated sewer model shows that the existing 21-inch gravity pipeline in Redwood Drive has sufficient capacity to convey updated baseline Peak Wastewater Flows as well as the Peak Wastewater Flows from the project.

The City Engineer has reviewed the Project plans and the Water and Wastewater Assessment and determined that the anticipated wastewater generation from the Project can be met by wastewater infrastructure. The final plans are required to be submitted to the City Engineer to confirm wastewater generation of final plans can be met by utilities prior to permit issuance under condition of approval **COA UTI-2**.

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

5.19(d-e) (Solid Waste Generation and Compliance with Solid Waste Management) – No Change Relative to the General Plan EIR

The 2013 General Plan EIR concluded that General Plan implementation would be served by a landfill for solid waste disposal needs and will require compliance with various laws and regulations, and the impact would be considered a less than significant impact.

During construction, the Project would generate solid waste from concrete and asphalt from the removal of existing improvements and vegetation waste from tree removal. In compliance with the 2016 Cal Green Tier 1 Mandatory Measures, the applicant will be required to recycle or salvage at least 65 percent of nonhazardous construction and demolition waste and prepare a Construction Waste Management Plan that documents the diversion of materials as required by CalGreen.¹⁴ The Project will be required to comply with Cotati Municipal Code Section 17.39.030.G(5), which requires coordination with refuse pickup providers to determine the adequate size and number of containers required to accommodate all waste streams (landfill, recycling, and composting). Therefore, the Project's impacts related to solid waste will not result in new or more severe impacts relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CSF 1.1: Require all development projects to demonstrate, to the satisfaction of the City Engineer, that the City's public services and utilities can accommodate the increased demand for services associated with the project.

Status: As part of the development review process, the City Engineer has reviewed the Project, including the Water and Wastewater Assessment. The engineer determined that through the implementation of the 2011 Water Distribution System Master Plan (WDSMP) or the 2017 Sewer Master Plan Update (SMPU) as planned in the Capital Improvement Program and funded through impact fees, connection fees, and service fees required, the City's facilities will be adequate to serve the Project. As such, the Project is consistent with this policy.

Policy CSF 1.2: Require new development to offset or mitigate impacts to public services and facilities to ensure that service levels for existing users are not degraded or impaired by new development, to the satisfaction of the City Engineer.

Status: Through the building permit review process, the Project will be required to pay water and sewer impact fees and connection fees that are intended to cover the maintenance and incremental expansion of facilities as planned to accommodate buildout of the General Plan. Through implementation of the uniformly applied development standards in the Municipal Code, the Project is consistent with this policy.

Policy CSF 1.3: Limit approvals of new development to areas where adequate infrastructure and services are available or will be provided by the development.

Status: The Project site is located within City limits and is currently served by existing utilities and service systems. New service connections will be required that tie into the existing facilities, which are located along Redwood Drive and SR-116. The connection of new services is anticipated by the General Plan and does not require substantial infrastructure improvements or enhancements to adequately serve the Project beyond those already programed in the Capital Improvement Program. As such the Project is consistent with this policy.

¹⁴ California Green Building Standards Code (2022), Effective January 2, 2023.

Policy CSF 1.6: Require development, infrastructure, and long-term planning projects to be consistent with all applicable City plans and programs related to public services and facilities, including but not limited to the Water Master Plan, the Sanitary Sewer Master Plan and the Capital Improvement Plan. New projects shall assist with the implementation of these plans through the provision of fair-share payments, construction of improvements, or other means identified as appropriate by the City Engineer.

Status: Prior to the issuance of a building permit, the applicant is required to pay development impact fees for the incremental increase in demand for public services and facilities, as well as comply with all Public Works/Engineering's Conditions of Approval. Therefore, the project is consistent with this policy.

Policy CSF 2.2: Prior to the approval of development, infrastructure, Specific Plans, or other projects that would result in increased demand for public water production, conveyance, treatment or storage, project proponents must demonstrate proof of adequate water supply (e.g., that existing services are adequate to accommodate the increased demand, or improvements to the capacity of the system to meet increased demand will be made prior to project implementation) and that potential cumulative impacts to water users and the environment will be addressed.

Action CSF 2a: As part of the development review process, determine the potential impacts of development and infrastructure projects on the water system and ensure that new development contributes its fair share toward necessary water infrastructure and supply. The Planning Department and the City Engineer shall be responsible for ensuring that the assessments are made.

Status: The City Engineer has determined that the Project will adequately connect to and comply with the City's sewer system requirements and compliance with the City of Cotati Sewer Collection System Master Plan, Urban Water Management Plan, and Water Distribution System Master Plan. Additionally, the City requires that the Project enter into a Public Improvement Agreement (PIA). The City also requires that the site be annexed into the Community Facilities District (CFD) and **COA UTI-3** is required. As conditioned, the Project complies with this policy and action.

Policy CSF 3.8: Require new or significantly remodeled residential and all non-residential development to incorporate sufficient, attractive, and convenient interior and exterior storage areas for recyclables and green waste.

Status: The Project site plan identifies space in each garage to accommodate three household sized waste bins (trash, recycling, compost). A trash room is proposed on the ground floor at the northeast corner of both Building A and Building B to accommodate waste, recycling, and compost from the commercial units. A trash enclosure is proposed for the northeast corner of the parking lot that would serve the apartment building. **COA UTI-3** requires the submission and approval of final plans that demonstrate enclosed waste, recycling, and compost storage are sufficient and appropriately located. As conditioned, the Project design is consistent with this policy.

Conclusion and Environmental Conditions of Approval:

The Project is within the scope of development projected under the General Plan and would not result in any substantial new or more severe impacts to utilities relative to what was identified in the 2013

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

UTI-1: The applicant shall submit landscape and irrigation plans for plantings at the time of the Improvement Plan submittal package. All landscaping and irrigation shall comply with the City Water Efficient Landscape Ordinance (WELO) and is subject to review and approval by the City Engineer. Prior to issuance of a certificate of occupancy, all plantings and irrigation systems in the approved final landscaping plan shall be completed.

UTI-2: The final Project plans shall be submitted to the City Engineer for review and approval to confirm water demand and wastewater generation can be met by utilities prior to permit issuance.

UTI-3: The applicant shall execute a City standard Public Improvement Agreement to address the proposed public improvements. The agreement shall address design, construction, dedication of and City acceptance of the public improvements. The agreement shall include an engineer's cost estimate for the public improvements, security for the completion of these improvements, an initial deposit and execution of the City's deposit account agreement for City inspection of the construction of the public improvements. The agreement shall be submitted for review and approval by the City. The agreement shall also address the ownership, maintenance, lighting, parking, and access and shall be recorded against the lands of the project.

5.20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; State Responsibility Area Fire Hazard Severity Zones June 15, 2023; Local Responsibility Area Recommended Fire Hazard Severity Zones February 24, 2025 ; and Memorandum from Rancho Adobe Fire Protection District prepared on October 29, 2024.

2013 General Plan EIR Findings

The 2013 General Plan EIR addressed impacts related to wildfire hazards in Chapter 3.7 – Hazards. The following impact related to wildfires was considered under the 2013 General Plan EIR:

- Impact 3.7-6: The General Plan does not have the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Through the

implementation of mitigating General Plan Policies CSF 2.28-CSG 2.32, CSF 2.36, and SA 1.1 - SA 1.7 and Actions CSF 2o, CSF 2p, CSF SA 1a, and SA 1d, implementation of the 2013 General Plan would have a less than significant impact.

Mitigating policies and actions provided in the General Plan are included in the 2013 General Plan EIR to ensure public facilities are able to respond to wildfire emergencies, effective coordination between fire districts, and maintenance of emergency response facilities and infrastructure. Individual projects are directed to be reviewed by the City and the Rancho Adobe Fire Protection District for code compliance. The California Department of Forestry and Fire Protection (CalFire) has identified the site as being located outside of a State Responsibility Area (SRA) and Local Responsibility Area (LRA) Fire Hazard Severity Zone.

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

SONOMA COUNTY HAZARD MITIGATION PLAN

On September 28, 2021, the Cotati City Council adopted the Sonoma County Multijurisdictional Hazard Mitigation Plan (HMGP) to guide pre- and post-disaster mitigation of identified hazards. The plan includes actions to mitigate current risk from hazards and changes in hazard impacts resulting from climate change, including wildfires. The plan includes Best Management Practices to Mitigate the Wildfire Hazard. These practices include what are called “personal scale” alternatives such as:

- Clear overgrown underbrush and diseased trees;
- Create and maintain defensible space around structures;
- Regular mowing/landscape maintenance;
- Use of fire-resistant building materials;
- Employ techniques from the Firewise USA Program; and
- Installing or replacing roofing with non-combustible materials.

Sonoma County Community Wildfire Protection Plan

In June 2023, the County Community Wildfire Protection Plan (CWPP) was incorporated by reference into the Sonoma County Annex of the Multi-Jurisdiction Hazard Mitigation Plan (MJHMP). Part of this plan includes the Sonoma County Wildfire Risk Index (WRI). Published on November 17, 2022, the WRI predicts relative wildfire risk. The Wildfire Risk Analysis divides the county's landmass into 100-acre hexagons which are assigned a risk level. While each hexagon is assigned an overall risk level, conditions may vary significantly within the shape. It is entirely possible that areas of relatively low risk could exist within a polygon whose overall risk is high. The purpose of the CWPP and WRI is to inform planning to improve wildfire resiliency.

Project Consistency with the 2013 General Plan EIR

5.20(a-d) (Impair Emergency Plans, Exacerbate Wildfire Risks, Infrastructure Contribution to Risks, Exposure to Wildfire-Related Risks) – No Change Relative to the General Plan EIR

The Project is consistent with the allowable uses under the land use designations in the General Plan. As such, the Project would not conflict with an emergency plan in that the General Plan accounts for the impacts of the planned development under the 2013 General Plan EIR. The Project site is not located in the VHFHSZ as provided by CalFire and is not within a watercourse or significant slope that may become unstable following a wildfire.

Additionally, the Project falls under the jurisdiction of the RAFFD who implements the fire resiliency requirements in the Sonoma County Multijurisdictional Hazard Mitigation Plan. The project has undergone initial review by RAFFD and initial plans have been determined to be adequate with standard conditions applied to all projects. Therefore, the Project would not conflict with an emergency plan, interfere with emergency access, or otherwise exacerbate wildfire risk.

Through the application of uniformly applied standards in the building and fire codes, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CSF 2.30: Design and maintain City streets in such a way so as to maintain acceptable emergency vehicle response times.

Status: The final Project plans will be reviewed by RAFFD for review and approval. Construction plans will be routed to the District for confirmation that final design meets emergency access requirements. Through the implementation of uniformly applied development standards, the Project is consistent with this policy.

Action CSF 2o: Continue to enforce the California Building Code and the California Fire Code to ensure that all construction implements fire-safe techniques, including fire resistant materials, where required.

Status: The final building plans will undergo review for compliance with the uniform standards of the California Building Code and the California Fire Code by the City of Cotati Building Department and RAFFD during the building permit review process. As such, the Project is consistent with this policy.

Action CSF 2p: As part of the development review process for new projects, the City will continue to refer applications to the Rancho Adobe Fire Protection District for determination of the project's potential impacts on fire protection services. Requirements will be added as Conditions of Approval to project's approving resolutions.

Status: The application for the Project has been referred to the RAFFD for initial review and conditioned accordingly. Furthermore, the Project will be subject to final review and approval by the RAFFD prior to issuance of a building permit.

Conclusion and Environmental Conditions of Approval

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

are required beyond compliance with uniformly applied development standards and applicable local and state regulations.

5.21. MANDATORY FINDINGS OF SIGNIFICANCE

	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; and Public Works Draft Conditions of Approval Memo prepared on March 11, 2025.

2013 General Plan EIR Findings

Under the requirements of CEQA, an EIR is required to discuss cumulative impacts to which the project would contribute. A cumulative impact is defined as an impact resulting from the combined effects of past, present, and reasonably foreseeable future projects or activities. The 2013 General Plan EIR concluded that implementation of the General Plan to Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gasses and Climate Change, Hazards, Hydrology and Water Quality, Land Use and Population, Agriculture, Public Services, and Recreation.

The 2013 General Plan EIR determined that the implementation of the General Plan would result in the following Cumulative impacts:

- Impact 3.10---7: Cumulative Noise Impacts (Significant and Unavoidable)
- Impact 3.13---3: Potential to exceed wastewater treatment capacity or the requirements of the RWQCB (Cumulatively Considerable and Significant and Unavoidable)
- Impact 4.1: Cumulative Degradation of the Existing Visual Character of the Region (Considerable Contribution and Significant and Unavoidable)
- Impact 4.11: Cumulative Exposure of Noise-Sensitive Land Uses to Noise in Excess of Normally Acceptable Noise Levels or to Substantial Increases in Noise (Considerable Contribution and Significant and Unavoidable)
- Impact 4.13: Cumulative Impact on the Transportation Network (Considerable Contribution and Significant and Unavoidable)
- Impact 4.14: Cumulative Impact on Utilities (Considerable Contribution and Significant and Unavoidable)
- Impact 4.15: Irreversible Effects (Significant and Unavoidable)

Project Consistency with the 2013 General Plan EIR

5.21(a-c) (Threaten to eliminate a biological resource or cultural resource, cumulatively considerable, substantial adverse effects) – No Substantial Change Relative to the General Plan EIR

The proposed Project is consistent with both the General Plan Land Use Designation of General Commercial and Zoning designation of Commercial, Gravenstein Corridor (CG). The Project Conditions of Approval ensure that the Project complies with the policies and actions of the 2013 General Plan. Additionally, and as noted throughout this document, the Project shall comply with the federal, state, and local regulations including the uniformly applied standards of the City of Cotati Municipal Code.

Additionally, there are three other approved projects in the vicinity, Cotati Village 1, Cotati Village 2, and the SR-116/West Cotati Avenue Realignment. While these projects are on different timelines, it is possible that construction activities may overlap. In order to prevent cumulative effects from multiple projects, **COA MF-1** will be required of the project applicant to coordinate with the City on any concurrent construction activities and reduce any possible lane closures, haul trips, and minimize dust and noise as much as feasible.

The Project is within the scope of development projected under the General Plan and is conditioned such that it would not result in any substantial new or more severe impacts relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The environmental conditions of approval that implement the 2013 General Plan EIR mitigating policies are listed in section 7 including the following:

MF-1: The applicant shall coordinate the project's construction activities and construction schedule with the City to coordinate the concurrent construction of projects immediately adjacent to the project

site and ensure that overlapping lane closures, periods of increased noise and dust generation are minimized to the extent practicable.

6. REFERENCE DOCUMENTS

The following reference documents are hereby incorporated by reference and are available for review during normal business hours at Cotati City Hall 201 W. Sierra Avenue in Cotati, CA.

6.1. TECHNICAL APPENDICES

- A. Redwood Row Air Quality & Greenhouse Gas Assessment from Illingworth and Rodkin on December 20, 2024.
- B. Biological Resources Analysis for Redwood Row Project prepared by Monk and Associates on September 24, 2024.
- C. Cultural Resource Evaluation of the Proposed Redwood Drive Project prepared by Archaeological Resource Management on October 10, 2024. – NO PUBLIC DISTRIBUTION
- D. Preliminary Geotechnical Assessment prepared by Quantum Geotechnical Inc on May 6, 2022.
- E. Phase I Environmental Site Assessment prepared by Stantec Consulting Services Inc. on February 22, 2022.
- F. Preliminary Hydrology and Hydraulic Study for Redwood Row prepared by CSW/Stuber-Stroeh Engineering Group Inc. in November of 2023 and revised in October of 2024.
- G. Stormwater Control Plan for Redwood Row prepared by CSW/Stuber-Stroeh Engineering Group Inc. on September 27, 2024.
- H. Redwood Row Project Noise & Vibration Assessment prepared by Illingworth and Rodkin on December 20, 2024.
- I. Transportation Impact Study for the Cotati Village Project prepared by W-Trans on April 4, 2025.
- J. Redwood Row Water and Wastewater Assessment Report prepared by Carollo on February 13, 2025.

6.2. OTHER DOCUMENTS REFERENCED

- 1. *2022 California Green Building Standards Code (CalGreen)*, Effective January 1, 2023.
- 2. *Archaeological Study for the Gravenstein Highway (SR-116)/West Cotati Avenue Realignment Project*, Evans & De Shazo, September 28, 2023.
- 3. *BAAQMD 2022 Bay Area Clean Air Plan*, prepared by the Bay Area Air Quality Management District, April 2022.
- 4. *BAAQMD CEQA Guidelines*, prepared by the Bay Area Air Quality Management District, April 2022.
- 5. *BAAQMD Recommended Methods for Screening and Modeling Local Risks and Hazards*, prepared by the BAAQMD, May 2011.
- 6. *California Code, Government Code Section 66477.*
- 7. *California Code, Health and Safety Code Section 25501(n)(1).*

8. *California Scenic Highway Mapping System, Scenic Highway System Lists*, Cal Trans. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed December 15, 2023.
9. *California Department of Conservation Farmland Mapping and Monitoring Program* website accessed on December 26, 2023. <https://maps.conservation.ca.gov/dlrp/ciff/>
10. *City of Cotati Municipal Code*. <https://www.codepublishing.com/CA/Cotati>
11. *Climate Action 2020 and Beyond: Sonoma County Regional Climate Action Plan*, prepared by Sonoma County Regional Climate Protection Authority, July 2016.
12. *Cotati Bicycle and Pedestrian Master Plan*, prepared by Sonoma County Transportation Authority for the City of Cotati, adopted December 2008, updated April 22, 2014.
13. *Cotati Villages Project 15183 Consistency Analysis*, prepared by M-Group and approved by the Cotati City Council on February 27, 2024. (SCH: 2024030070)
14. *Cotati Villages 2 Project 15183 Consistency Analysis*, prepared by M-Group and approved by the Cotati City Council on August 27, 2024. (SCH: 2024081410)
15. *EnviroStor*, managed by the Department of Toxic Substances Control, accessed September 2023.
16. *GeoTracker*, managed by the State Water Resources Control Board, accessed September 2023.
17. *Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin* prepared by Sonoma Water, December 2021.
18. *Guidelines for Analysis of Vehicle Miles Traveled*, adopted by City of Cotati September 22, 2020.
19. *Highway 116/West Cotati Avenue Intersection Safety Improvement Project 15183 Consistency Analysis*, prepared by M-Group and approved by the Cotati City Council on September 10, 2025. (SCH# 2024090793)
20. *Local Responsibility Area Fire Severity Zone Map*, Office of the State Fire Marshal, November 2007.
21. MTC/ABAG Hazard Viewer Map, December 5, 2024.
22. *National Flood Hazard Layer*. FEMA. September 2023. <https://www.fema.gov/flood-maps/national-flood-hazard-layer>
23. *Recovery Plan for the Santa Rosa Plain*, US Fish and Wildlife Service (USFWS), 2016.
24. *Public Works Draft Conditions of Approval Memo prepared on March 11, 2025*.
25. *Redwood Row Project – Permit PA #22-07 Memorandum from Rancho Adobe Fire Protection District prepared on October 29, 2024*.

26. *Reinitiation of Formal Consultation on Issuance of Clean Water Act, Section 404 Permits by the U.S. Army Corps of Engineers (Corps) on the Santa Rosa Plain, Sonoma County, California*, prepared by USFWS, 2020.
27. *Santa Rosa Plain Conservation Strategy*, prepared by USFWS, 2005.
28. *Santa Rosa Plain Conservation Strategy Map*, prepared by USFWS, 2007.
29. *Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021*, prepared by Tetra Tech Consultants for Permit Sonoma, October 2021.
30. *Sonoma County Permit Sonoma GIS, Williamson Act Contracts*, Sonoma County, 2019.
31. *Sonoma County Water Agency 2020 Urban Water Management Plan*, prepared by Brown and Caldwell, June 2021.
32. *State Responsibility Area Fire Severity Zone Map*, Office of the State Fire Marshal, June 15, 2023.
33. *Technical Advisory on Evaluating Transportation Impact in CEQA*, prepared by the California Office of Planning and Research, December 2018.
34. *USGS Land Cover Classification System*.

7. ENVIRONMENTAL CONDITIONS OF APPROVAL

The following conditions of approval have been identified through this analysis and ensure implementation of applicable mitigation measures and policies set forth in the 2013 General Plan EIR.

AES-1: Prior to issuance of a building permit, the applicant shall submit a final lighting plan and the City shall verify that the final lighting plan complies with applicable requirements set forth in Section 17.30.060 of the Cotati Municipal Code, in accordance with General Plan Action OS1f to minimize off-site and night sky impacts of outdoor lighting.

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

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
7. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
8. Unpaved roads providing access to or on the site located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted wood chips, mulch, or gravel.
9. Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

BIO-1: To avoid impacts to nesting raptors and passerines, a nesting bird survey should be conducted within 7 days prior to commencing with construction work if this work would begin between February 1 and August 31. The nesting bird survey shall be conducted on the project site and within a zone of influence around the project site. The zone of influence includes those areas off the project site where raptors could be disturbed by earth-moving vibrations or noise. The nesting bird survey should include examination of all suitable nesting habitats within 300 feet of the entire project site. A nesting bird survey report should be prepared upon completion of the survey and provided to the City of Cotati with any recommendations required for establishment of protective buffers as necessary to protect nesting birds.

If birds are identified nesting on or within the zone of influence of the construction project, a qualified biologist shall establish a temporary protective buffer around the nest(s). The buffer must be of sufficient size to protect the nesting site from construction-related disturbance and shall be established by a qualified ornithologist or biologist with extensive experience working with nesting

birds near and on construction sites. Typically, adequate nesting buffers are 75 feet from the nest site or nest tree dripline for small birds and up to 300 feet for sensitive nesting birds that include several raptor species known from the region of the project site. The nest buffer should be staked with orange construction fencing or orange lath staking.

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

BIO-2: To ensure there are no direct impacts to American badger, a qualified biologist will conduct a preconstruction den survey no more than 14 days prior to site grading. If a potential den is located, infrared camera stations will be set up and maintained for three (3) consecutive nights at the potential den openings prior to initiation of grading/work activities to determine the status of the potential dens. If American badger is not found to be using the den, the burrow (den) will be filled, and site grading may proceed in the vicinity of this burrow(s) unhindered.

If American badger is found to be using a den within the area of proposed ground disturbance, provided it is not a natal den, the badger will be passively and humanely evicted from its den if it could be impacted by grading or other ground disturbing activities; a one-way eviction door placed at the den opening is the least invasive option. If a natal den is found, eviction will not take place until the young are no longer dependent on the burrow. The project proponent will consult with CDFW regarding the natal den and to discuss a suitable eviction plan. The final eviction plan will be submitted to the City of Cotati prior to implementation. Any American badger found onsite will be reported to CDFW's CNDDDB.

BIO-3: Prior to site preparation or grading, the applicant shall secure wetland mitigation credits for impacted waters of the State at a 1:1 ratio (or at the ratio required by RWQCB) from an approved bank within the same conservation area or in proximity as feasible and provide evidence of procurement to the City. During all frontage work and construction activities occurring within 25 feet of wetlands as mapped by the "Draft Aquatic Resources Delineation Map for SR-116 and West Cotati Ave Project" prepared by Monk and Associates on August 23, 2023, the applicant/contractor shall install and maintain exclusion fencing precluding inadvertent access to wetlands to be preserved.

BIO-4: Tree removal shall be done in compliance with Municipal Code Chapter 17.54. All project contractors shall implement all applicable tree protection requirements as determined by the tree permit.

CUL-1: Full-time archaeological and tribal monitoring shall be conducted for all Project-related ground-disturbing activities within 200 feet of the canine alert locations and the area where the current mound of imported soil is located.

- Prior to the start of the Project, a Secretary of the Interior-qualified archaeologist shall prepare an Archaeological and Tribal Monitoring Plan (ATMP) in consultation with FIGR. The ATMP should provide a provision for a pre-construction Cultural Resources Awareness Training (CRAT) and details regarding the types of archaeological resources that could be found within the Project Area, and the procedures to follow should any archaeological material be encountered, including proper notification to Tribes, agencies, and stakeholders; and an assessment of the significance of any archaeological resources encountered during construction.
- The archaeological and tribal monitors shall be empowered to halt construction activities at the location of a discovery to review possible archaeological material and to protect the resource while the finding is being assessed. Monitoring shall continue until the Secretary of the Interior-qualified archaeologist in consultation with FIGR, determines that full time monitoring can be reduced to spot check monitoring or that monitoring is no longer warranted. A report shall also be prepared to document findings after the ground disturbance is complete.

CUL-2: If a precontact or historic period archaeological resource is encountered by equipment operators during Project-related ground-disturbing activities and an archaeologist is not present, that work be halted within 100 feet of the discovery area until a qualified professional archaeologist assesses the find and makes recommendations for the treatment of the resource.

- If avoidance of the archaeological resource is not feasible, the archaeological resource shall be evaluated for its eligibility for listing in the CRHR or as a unique archaeological resource.
- If the resource is determined to be eligible for the CRHR or is a unique archaeological resource, adverse impacts shall be mitigated.
- If the resource is a Native American resource, the assessment, evaluation, and treatment recommendations shall be made in consultation with FIGR. Mitigation may include excavation of the archaeological deposit in accordance with the Secretary of Interior's Standards and Guidelines for Archaeological Documentation, which may include data recovery using standard archaeological field methods and procedures, laboratory and technical analyses of recovered archaeological materials, preparation of a report detailing the methods, findings, and significance of the archaeological site and associated materials, and accessioning of archaeological materials and a technical data recovery report at a curation facility.
- Any report produced as a result of a discovery shall be submitted to the City of Cotati and the NWIC/CHRIS upon completion of the resource assessment. Precontact period archaeological resources commonly encountered in the area may include obsidian (shiny, black, glass-like stone) and chert flaked-stone tools (e.g., projectile points, knives, choppers), midden (culturally darkened soil containing heat-affected rock, charcoal, ash, artifacts, animal bone, or shellfish remains), stone milling equipment, such as mortars and pestles, and features such as hearths, fire pits, house floor depressions and mortuary features consisting of human skeletal remains. Historic period archaeological resources include

backfilled privies, wells, and refuse pits; concrete, stone, or wood structural elements or foundations; and concentrations of metal glass, and ceramic refuse.

CUL-3: In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.94 and Section 5097.98 shall be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

- There shall be no further excavation or disturbance within 100 feet of the remains until the Sonoma County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. The soil excavated from the discovery location shall also be secured. If the coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the most likely descendant of the deceased Native American. The most likely descendant may make recommendations for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.
- Where the following conditions occur, the landowner or authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD or on the project site in a location not subject to further subsurface disturbance:
 - The NAHC is unable to identify the most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being given access to the site.
 - The descendant identified fails to make a recommendation.
 - The landowner or authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

GEO-1: The Project shall implement recommendations from the preliminary geotechnical investigation prepared by Quantum Geotechnical Inc. on May 6, 2022 (**Appendix D**).

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

All recommendations shall be incorporated into the project design, construction documents and improvement plans, or as otherwise determined by the City Engineer and/or Chief Building Official. The Project's geotechnical engineer shall inspect the construction work and shall certify to the City,

prior to issuance of a certificate of occupancy, that the improvements have been constructed in accordance with the geotechnical analyses.

GEO-2: If construction or grading activities result in the discovery of unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Department shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Department.

GHG-1: The Project shall comply with CalGreen Tier 2 Electric Vehicle charging infrastructure requirements.

HAZ-1: Prior to commencing work within Caltrans Right of Way, the Applicant shall prepare a Lead Compliance Plan and a Soil Management Plan in compliance with current Caltrans guidelines, and a worker Health and Safety Plan for review and acceptance by the City of Cotati. The plans shall be implemented during frontage improvements on SR-116 and shall address:

- Sampling and analysis of soils prior to earth-moving work
- transportation and disposal of any contaminated soil in compliance with state and federal law
- worker health and safety during the handling of potentially hazardous soils

HYD-1: The applicant shall submit a Storm Water Prevention and Pollution Plan (SWPPP) and erosion and sediment control plan approved by the Regional Water Quality Control Board to the City Engineer prior to the issuance of a grading permit. The SWPPP shall include Best Management Practices for construction activities as well as accounting for any BMPs required for operational activities. The SWPPP shall incorporate the requirements of all applicable federal, state, and local regulations. Submitted plans shall also demonstrate compliance with City of Cotati Municipal Code Chapter 13.68 Storm Water Ordinance and Chapter 14.36 Erosion and Sediment Control.

HYD-2: Prior to issuance of a grading or building permit, the applicant shall submit final drainage plans including a final Stormwater Low Impact Development and Stormwater Control Plan that implements the Hydrology and Hydraulics Study for review and approval by the City Engineer prior to issuance of the building permit.

NOI-1: Prior to issuance of the building permit, the applicant shall submit final design plans and an acoustical analysis prepared by a qualified acoustical engineer demonstrating that the design incorporates adequate controls to reduce interior noise levels to 45 dBA Ldn or lower within residential units. The acoustical engineer shall verify that appropriate building construction techniques required to meet the interior noise standard, which may include sound-rated windows and doors, sound-rated wall constructions, and acoustical caulking are installed in a manner that achieves 45 dBA Ldn.

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

10. Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm on weekdays and 9:00 am and 5:00 pm on Saturdays. No construction shall occur on Sundays or holidays.
11. All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
12. The construction contractor shall utilize “quiet” models of air compressors and other stationary noise sources where technology exists.
13. At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences.
14. Unnecessary idling of internal combustion engines shall be prohibited.
15. Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
16. Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing.
17. The construction contractor shall designate a “noise disturbance coordinator” who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures as warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.
18. The contractor shall construct a solid plywood fence along the western and northwestern property lines to shield the adjoining future (if applicable) and existing residential receptors from construction work. A temporary 8-foot-tall noise barrier would be tall enough to block direct line-of-sight with ground-level receptors and reduce noise levels generated by large earthwork equipment by a minimum of 4 dBA.

REC-1: The applicant shall provide the remaining balance of parkland in compliance with Municipal Code Section 17.76.030(C) or pay an in-lieu fee in accordance with Municipal Code Section 17.76.030(D) and as approved by the Planning Director.

TRA-1: Final Project plans shall show the location and details of proposed bicycle parking on site based on final vehicular parking space counts and consistent with the requirements of Cotati Municipal Code Section 17.36.070.

TRA-2: Prior to commencing public improvements or construction of frontage improvement and access point along SR-116, the applicant shall secure an encroachment permit from Caltrans and provide a copy of the permit to the Community Development Department.

TRA-3: Final design and landscaping plans shall be submitted and show compliance with Municipal

Code Section 17.30.040(c)(2). Final landscaping plans shall include the specific plants that will be placed in the traffic safety visibility area and their maximum projected height which shall be no taller than 36 inches except for trees with their canopy trimmed to a minimum of eight feet above grade. These standards shall be applied to intersections between the multi-use path and any intersecting streets or driveways.

TRA-4: If Project occupancy occurs prior to the realignment of W. Cotati/SR-116 project, an eastbound left-turn lane on SR-116 with a minimum of 50 feet of storage shall be provided at the eastern project driveway, subject to review and acceptance by the City Engineer.

UTI-1: The applicant shall submit landscape and irrigation plans for plantings at the time of the Improvement Plan submittal package. All landscaping and irrigation shall comply with the City Water Efficient Landscape Ordinance (WELO) and is subject to review and approval by the City Engineer. Prior to issuance of a certificate of occupancy, all plantings and irrigation systems in the approved final landscaping plan shall be completed.

UTI-2: The final Project plans shall be submitted to the City Engineer for review and approval to confirm water demand and wastewater generation can be met by utilities prior to permit issuance.

UTI-3: The applicant shall execute a City standard Public Improvement Agreement to address the proposed public improvements. The agreement shall address design, construction, dedication of and City acceptance of the public improvements. The agreement shall include an engineer's cost estimate for the public improvements, security for the completion of these improvements, an initial deposit and execution of the City's deposit account agreement for City inspection of the construction of the public improvements. The agreement shall be submitted for review and approval by the City. The agreement shall also address the ownership, maintenance, lighting, parking, and access and shall be recorded against the lands of the project.

MF-1: The applicant shall coordinate the project's construction activities and construction schedule with the City to coordinate the concurrent construction of projects immediately adjacent to the project site and ensure that overlapping lane closures, periods of increased noise and dust generation are minimized to the extent practicable.