Proposed Mitigated Negative Declaration

Sonoma County Permit and Resource Management Department
2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-1900 FAX (707) 565-1103

Publication Date:	August 18, 2025
Public Review Period:	30 days
State Clearinghouse No.	
Permit Sonoma File Number:	PLP19-0042
Lead Agency Contact:	Derik Michaelson
Phone:	(707) 565-3095
Email:	derik.michaelson@sonomacounty.gov

Pursuant to Section 15071 of the State CEQA Guidelines, this proposed Mitigated Negative Declaration, and the attached Initial Study constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

Project:	U-Haul Moving and Storage Project
Applicant/Owner:	Amerco Real Estate Company
Site Address:	3601 Santa Rosa Avenue, Sonoma County, California
APN:	134-123-034
General Plan:	General Industrial
Zoning:	Limited Urban Industrial District (M1) within the Valley Oak Habitat (VOH) Combining District and Scenic Resources (SR) Combining District
Decision Body:	Design Review Committee
Appeal Body:	Sonoma County Board of Supervisors

Description:
The applicant, Amerco Real Estate Company, is proposing to redevelop an existing U-Haul Moving and Storage Facility located at 3601 Santa Rosa Avenue in Sonoma County, California. The existing U-Haul Moving and Storage Facility is currently developed with a 2,163-square foot retail building, a 5,166-square foot warehouse building, a 4,099-square foot self-storage building, and a surface parking lot. The proposed U-Haul Moving and Storage Project (proposed project) would demolish the three existing buildings to construct a new 4,745-square foot retail building and a 116,600-square foot self-storage building. The proposed project would also include a surface parking lot, on- and off-site utility connections, landscaping, and frontage improvements. A complete description of the proposed project is provided in Section III, below.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

This project potentially affects the following environmental factors as discussed within the attached Initial Study. Those checked under “Yes” involve at least one impact that is either “Potentially Significant” or “Less than Significant with Mitigation.” Those checked under “No” involve either “No Impact” or has been determined “Less than Significant.”

Table 1: Summary of Environmental Factors

Environmental Factors		Abbrev.	Yes	No
1.	Aesthetics	VIS		X
2.	Agriculture & Forestry Resources	AG		X

3.	Air Quality	AIR	X	
4.	Biological Resources	BIO		X
5.	Cultural Resources	CUL		X
6.	Energy	ENG		X
7.	Geology and Soils	GEO	X	
8.	Greenhouse Gas Emission	GHG		X
9.	Hazards and Hazardous Materials	HAZ	X	
10.	Hydrology and Water Quality	HYD	X	
11.	Land Use and Planning	LUP		X
12.	Mineral Resources	MIN		X
13.	Noise	NOI		X
14.	Population and Housing	POP		X
15.	Public Services	PUB		X
16.	Recreation	REC		X
17.	Transportation	TRA		X
18.	Tribal Cultural Resources	TCR		X
19.	Utilities and Service Systems	UTL		X
20.	Wildfire	FIRE		X
21.	Mandatory Findings of Significance	MFS	X	

RESPONSIBLE AND TRUSTEE AGENCIES

The following lists other public agencies whose approval is required for the proposed project, or who have jurisdiction over resources potentially affected by the proposed project.

Table 2: Agencies and Permits Required

Agency	Activity	Authorization
Bay Area Air Quality Management District	Dust Generation during construction	BAAQMD's Basic Construction Mitigation Measures Regulation 6, Particulate Matter and Visible Emissions
State Water Resources Control Board	Generating stormwater (construction, industrial, or municipal)	National Pollutant Discharge Elimination System (NPDES) requires submittal of NOI

ENVIRONMENTAL FINDING:

Based on the evaluation in the attached Initial Study, I find that the project described above will not have a significant adverse impact on the environment, provided the mitigation measures identified in the Initial Study are included as conditions of approval for the project and a Mitigated Negative Declaration is proposed. The applicant has agreed in writing to incorporate the identified mitigation measures into the project plans.

Derik Michaelson, Planner III

August 18, 2025
Date

Expanded Initial Study

Sonoma County Permit and Resource Management Department
2550 Ventura Avenue, Santa Rosa, CA 95403
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I. INTRODUCTION

The applicant, Amerco Real Estate Company, is proposing to redevelop an existing U-Haul Moving and Storage Facility with a new 4,745 square foot retail building and a 116,600 square foot self-storage building. A referral letter was sent to the appropriate local, state, and federal agencies and interest groups who may wish to comment on the project.

This report is the Initial Study required by the California Environmental Quality Act (CEQA). Stantec Consulting Services Inc. (Stantec) has prepared this document at the direction of the Sonoma County Permit and Resource Management Department, Project Review Division. Information on the project was provided by the applicant. Technical studies were provided by qualified consultants to support the conclusions in this Initial Study. Technical studies, other reports, documents, and maps referred to in this document are available for review through the Project Planner, or the Permit and Resource Management Department (Permit Sonoma).

Please contact the Project Planner, Derik Michaelson, at derik.michaelson@sonoma-county.org or (707) 565-3095 for more information.

II. EXISTING FACILITY

The project site, identified as Assessor's Parcel Number (APN) 134-123-034, is located at 3601 Santa Rosa Avenue in Sonoma County, California. The site currently operates as an existing U-Haul Moving and Storage Facility consisting of a 2,163 square foot retail building, a 5,166 square foot warehouse building, and a 4,099 square foot self-storage building. The on-site buildings range from one to two stories tall. The remaining portion of the site is paved and consists of a surface parking lot with 113 parking spaces. The surface parking lot includes 23 parking spaces for customers and employee parking, and 90 parking spaces for truck and trailer rentals. Landscaping is limited to grasses, hackberry trees, and a few redwood trees along the site perimeter.

The existing facility provides limited self-storage services, truck and trailer rentals, and retail sales. The existing storage units are currently leased and stored items would be relocated to another local facility. The facility operates with 13 employees and is open Monday through Thursday from 7:00 a.m. to 7:00 p.m., Friday from 7:00 a.m. to 8:00 p.m., Saturday from 7:00 a.m. to 7:00 p.m., and Sunday 7:00 a.m. to 5:00 p.m.

III. PROJECT DESCRIPTION

The applicant is requesting approval of a Use Permit and Design Review application to redevelop an existing U-Haul Storage and Moving Facility with a new 4,745 square foot retail building and a 116,600 square foot self-storage building. The proposed project would also include a surface parking lot with 28 spaces, on- and off-site utility connections, landscaping, and frontage improvements. The proposed components are further detailed in the following sections. The project site plan is provided in Figure 2 and renderings of the proposed project are provided in Figure 3 and Figure 4.

Proposed U-Haul Self-Storage Building
3601 Santa Rosa Ave, Santa Rosa

Project Characteristics

Retail Building
The proposed project would construct a new single-story retail building of approximately 4,745 square feet at the eastern end of the site. The proposed retail building would have a maximum height of 20 feet. The building would include a retail showroom and counter of approximately 2,480 square feet, as well as a bathroom, employee break room, and office. The remaining portion of the building would accommodate a distribution and receiving area, totaling approximately 1,608 square feet. The main entrance would be provided on the western side of the building. A metal roll-up door would also be located on the western side of the building to access the distribution and receiving area.

Self-Storage Building
The proposed self-storage building would be constructed at the northwestern end of the site. The five-story building would be about 64 feet tall and total approximately 116,600 square feet. The building would provide 1,063 storage units, ranging in size from 5 feet by 5 feet to 10 feet by 15 feet. All storage units would be accessed from the main entrance located on the southern side of the building. Access to the upper levels of the building would be provided either by the two elevators, or the stairway located at the western and eastern ends of the building. An ADA-compliant restroom would be provided on the first, second, and fourth levels of the building. Additionally, four loading dock areas would be provided on the ground floor. Each loading dock area would be equipped with a metal roll-up door.

Hours of Operation and Employees
The proposed project would provide self-storage services, truck and trailer rentals, and retail sales. It is anticipated operation of the project would require approximately 13 employees upon buildout. These employees are expected to be the current 13 employees that work at the facility, which would be transferred to another local facility during project construction. Once project construction is completed, former storage lessees would be given priority to lease the new storage units. The facility would continue to operate Monday through Thursday from 7:00 a.m. to 7:00 p.m., Friday from 7:00 a.m. to 8:00 p.m., Saturday from 7:00 a.m. to 7:00 p.m., and Sunday 7:00 a.m. to 5:00 p.m.

Access, Circulation, and Parking
Currently, vehicles access the project site from the 32-foot-wide driveway in the center of the project site. Secondary access is provided by a 22-foot-wide driveway located at the northern end of the site. The proposed project would provide two access points by using the existing northern driveway and relocating the main driveway to the southern end of the site. The two driveways would be widened to 40 feet and connect to an internal drive lane of approximately 24 feet that extends along the southern boundary of the

site and terminates at a turnaround to accommodate heavy trucks and/or fire engines.

Pedestrian access to the site would be provided by the existing 6-foot-wide paved sidewalk connecting to the existing sidewalk along Santa Rosa Avenue. The project would also construct sidewalks throughout the site to access the proposed buildings and parking areas. A 4-foot to 6-foot-tall chain linked security fence would be installed along the site perimeter.

The proposed project would provide 15 surface parking spaces for general retail customers and 13 spaces for self-storage users. Electric vehicle (EV) charging stations would be provided as required by the California Green Building Standards Code.

Utilities

The proposed project would include utility connections in accordance with the requirements of the applicable utility providers for water, wastewater, stormwater drainage, power, and telecommunications services. These utilities would connect to existing infrastructure in the vicinity of the site.

Water Supply

Water is provided to the project site by Sonoma County Water Agency. The existing on-site water supply would be redirected to the proposed buildings via a new 4-inch water line, ultimately connecting to the 12-inch water main in Santa Rosa Avenue.

Wastewater

Wastewater conveyance for the proposed project would be provided by the City of Santa Rosa Water and Sewer Department, and wastewater treatment would occur at the Laguna Treatment Plant. As part of the project, the existing on-site sewer lines would be redirected to the proposed buildings via new sewer lines, ultimately connecting to the 8-inch sewer main in Santa Rosa Avenue.

Stormwater

Stormwater service would be provided by Sonoma County's existing stormwater system. The proposed project would create approximately 96,600 square feet of impervious surface and approximately 23,400 square feet of pervious surface consisting of three bioretention areas. The bioretention areas would retain and treat stormwater prior to entering the stormwater system.

Electricity and Natural Gas

Pacific Gas and Electric (PG&E) provides electricity and natural gas service to the project site. A PG&E pad mounted utility transformer and main switchboard is currently located along the northern site boundary. Electricity would be extended from the main switchboard to the two new buildings. The proposed project would include energy conservation features to meet the state's Title 24 Energy Efficiency standards, such as installing light-emitting diode (LED) lighting and EV charging stations.

Landscaping

The proposed project would provide approximately 26,252 square feet of landscaped areas along the perimeter of the site and adjacent to the proposed buildings. The proposed landscaping would include approximately 34 new trees, such as Chinese Hackberry, Desert Willow, and Valley Oak, as well as planting areas, which would include species such as Foxtail Agave, Arabian Aloe, Pink Parade Red Yucca, and others. The eastern side of the retail building, which faces Santa Rosa Avenue, would feature a green screen with seasonal vines. All landscaping would comply with Chapter 7D3, Water Efficient Landscape, of the Sonoma County Municipal Code, as well as the provisions set forth in the VOH Combining District.

Lighting

The proposed project would provide exterior lighting along the site perimeter and at each building entrance. The perimeter lighting would be mounted on four new 25-foot poles and two existing 25-foot poles. Three fixtures would be provided along the western side of the retail building. Five lighting fixtures would also be provided at the southern entrance of the self-storage building, and one fixture at the northeastern corner to illuminate the emergency exit doorway. All lights would be LED and would be shielded to reduce light spill onto adjacent properties.

Project Construction

Construction Schedule
As shown in Table 3, project construction is anticipated to occur over approximately 22 months, starting in May 2026 and ending in March 2028.

Table 3: Project Construction Schedule

Construction Task	Start Date	End Date
Site work (includes demolition and utility work)	May 2026	October 2026
Building A Construction	September 2026	April 2027
Building B Construction	February 2027	March 2028
Landscaping	January 2028	March 2028

Construction is expected to require up to 80 construction workers during peak construction, and it is anticipated that the construction workforce would be available from nearby areas. Project construction activities would be limited to daytime hours.

Construction Access, Equipment, and Storage
The project site would be accessed by construction crews from Santa Rosa Avenue. All construction materials and equipment would be staged on-site. Full roadway closures are not anticipated to be required to accommodate project construction, although one lane on the west side of Santa Rosa Avenue may require closure during utility installation. Any lane closures would require an encroachment permit from Sonoma County. Construction equipment anticipated on-site is listed in Table 4.

Table 4: Construction Equipment

Construction Task	Equipment Type	Number of Equipment
Site work (includes demolition and utility work)	D8/325 Excavator	2
	315 Excavator	2
	Skip loaders	2
	Dump trucks	5
Building Construction A	315 Excavator	1
	Skip Steer	1
	Dump truck	1
	Skytrak 10052	1
Building Construction B	Skytrak 10052	1
	305 Excavator	1
	Dump Truck	1
Landscaping	Skid Steer	1
	303 Excavator	1

Construction Activities
The proposed project would disturb the entire 3-acre site. Construction activities would require demolition, grading, foundation work, utility connections, internal roadway construction, building construction, frontage improvements, and landscaping on the project site. No pile driving is proposed.
It is estimated demolition activities would remove up to 4,000 cubic yards (CY) of materials from the site. The total amount of earth movement for the proposed project would require approximately 2,000 CY of

cut and approximately 3,000 CY of fill. The maximum depth of excavation is anticipated to be approximately 36 inches below ground surface (bgs).

IV. SETTING

The proposed project is located at 3601 Santa Rosa Avenue in Sonoma County, California. The project site is approximately 3-acres and located within the County's South Santa Rosa Area Plan, between U.S. Highway 101 (U.S. 101) and Santa Rosa Avenue.

Land uses surrounding the project site include a mix of industrial and commercial uses, such as auto body shops, self-storage facilities, and construction equipment rentals. The project site is adjacent to MotoMedic, Crandall Roofing, Inc., and Redwood Empire Awning to the north; Bobcat of the Bay Santa Rosa to the south; U.S. 101 to the west; and Santa Rosa Avenue to the east. Rural residential development is located to the west, beyond U.S. 101.

V. ISSUES RAISED BY THE PUBLIC OR AGENCIES

On April 18, 2024, Permit Sonoma circulated its agency referral packet providing opportunity for comments concerning project to selected relevant local, state and federal agencies, special interest groups anticipated to take interest in the project, and to local tribes for consultation purposes. On April 23, 2024, Brenda L. Tomaras of Tomaras & Ogas, LLP, on behalf of the Lytton Rancheria Tribe, and Anthony Macias, Tribal Historic Preservation Officer for the Kashia Band of Pomo Indians, each confirmed the tribes were not requesting consultation. No additional tribal responses have been received. At the time of publication of this Initial Study, no issues have been raised by responding agencies

VI. OTHER RELATED PROJECTS

No active applications for nearby development have been identified.

VII. EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts of this project based on the criteria set forth in the State CEQA Guidelines and the County's implementing ordinances and guidelines. For each item, one of four responses is given:

> **No Impact:** The project would not have the impact described. The project may have a beneficial effect, but there is no potential for the project to create or add increment to the impact described.
>
> **Less Than Significant Impact**: The project would have the impact described, but the impact would not be significant. Mitigation is not required, although the applicant may choose to modify the project to avoid the impacts.
>
> **Less Than Significant with Mitigation Incorporated:** The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will reduce the impact to a less than significant level.
>
> **Potentially Significant Impact:** The project would have the impact described, and the impact could be significant. The impact cannot be reduced to less than significant by incorporating mitigation measures. An environmental impact report must be prepared for this project.

Each question was answered by evaluating the project as proposed, that is, without considering the effect of any added mitigation measures. The Initial Study includes a discussion of the potential impacts and identifies mitigation measures to substantially reduce those impacts to a level of insignificance where feasible. All references and sources used in this Initial Study are listed in the Reference section at the end

of this report and are incorporated herein by reference.

The applicant, Americo Real Estate Company, has agreed to accept all mitigation measures listed in this Initial Study as conditions of approval for the proposed project, and to obtain all necessary permits, notify all contractors, agents and employees involved in project implementation and any new owners should the property be transferred to ensure compliance with the mitigation measures.

VIII. SOURCE DOCUMENTS

The following documents are referenced or were developed in preparation of this Initial Study and are hereby incorporated as part of this publication.

Available for download at: https://share.sonoma-county.org/link/QC2QOjZr2g0/

1. Project Application:
    a. Proposal Statement
    b. Design Plans
2. Submitted Technical Studies:
    a. Air Quality and Greenhouse Gas Assessment
    b. Geotechnical Study Report
    c. Noise Report
    d. Transportation Impact Analysis
    e. Confidential Reports (Unavailable for Public Review):
        i. Cultural Resources Technical Memorandum

Available by reference on Permit Sonoma website: https://permitsonoma.org/

3. Adopted Long Range Plans
    a. Aggregate Resources Management Plan
    b. Community Wildfire Protection Plan
    c. Hazard Mitigation Plan
    d. Sonoma County General Plan
4. Regulations & Initiatives
    a. Riparian Corridor (RC) Combining Zone
    b. Septic Regulations – Onsite Waste Treatment System Manual
    c. Sonoma County Zoning Ordinance
    d. Tree Ordinances and Regulations
    e. Water Efficient Landscape Ordinance

Available by reference on Public Agency website:

5. Alquist-Priolo Special Studies Zones; State of California; 1983.
   www.conservation.ca.gov/cgs/alquist-priolo
6. BAAQMD CEQA Guidelines; Bay Area Air Quality Management District;
   http://www.arb.ca.gov/.
7. California Environmental Quality Act (CEQA) Statute & Guidelines
   https://www.califaep.org/statute_and_guidelines.php
8. California Environmental Protection Agency
   http://www.calepa.ca.gov/SiteCleanup/corteseList/default.htm;
9. California Regional Water Quality Control Board
   https://www.waterboards.ca.gov/
10. California Department of Toxic Substances Control Management Board
    https://dtsc.ca.gov/dtscs-cortese-list/
11. North Coast Regional Water Quality Control Board
    https://www.waterboards.ca.gov/northcoast/
12. Sustainable Groundwater Management Act (SGMA)
    https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management
13. Santa Rosa Plain Watershed Groundwater Management Plan, Advisory Panel
    https://rpcity.granicus.com/MetaViewer.php?view_id=4&clip_id=518&meta_id=43080

1. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

Comment:

According to the General Plan, scenic resources within the County consist of community separators, scenic landscape units, and scenic corridors. The project site is in an urbanized area and developed as a U-Haul Moving and Storage Facility. The site is not identified in the General Plan as either a community separator or within a scenic landscape unit; however, the site is designated within the SR Combining District as the west end of the site is adjacent to a segment of U.S. 101 that the County considers a scenic corridor. Additionally, the project site is within the VOH Combining District which is to protect, preserve, and enhance valley oak woodland habitat. The purpose of the SR Combining District is to preserve the visual character and scenic resources of lands in the County and to implement the provisions of the General Plan Open Space and Resource Conservation Element pertaining to community separators, scenic landscape units, and scenic corridors.

The project site would be redeveloped with a new U-Haul Moving and Storage Facility and does not involve the removal of any trees, including valley oak woodland habitat. The proposed project would be consistent with the existing on-site use and the surrounding uses that consist of industrial and commercial uses. Additionally, the proposed project would be subject to Section 26-64-030 of the Sonoma County Municipal Code which requires a building setback of 20 feet for scenic corridor properties along U.S. 101. As the project site would be developed with the same use as current conditions and required to comply with Section 26-64-030 of the Sonoma County Municipal Code, the proposed project would not result in a substantial adverse effect on a scenic vista or scenic resource. The impact would be less than significant.

Significance Level:

Less than Significant Impact.

b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Comment:

The project site is developed as a U-Haul Moving and Storage Facility and does not contain vegetation, rock outcroppings, or historic buildings that are identified as scenic resources by the County's General Plan. Additionally, the project site is not located near an official or eligible State scenic highway. The nearest official State scenic highway is State Route 12, which is approximately 7 miles northeast of the project site. State Route 116 is also identified as an eligible State scenic highway and located approximately 4 miles southwest of the project site. The project site is not visible from State Route 12 or State Route 116; therefore, the proposed project would have no impact on scenic resources within a State scenic highway.

Significance Level:

No Impact.

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

Comment:

The project site is in an urbanized portion of the County, between U.S. 101 and Santa Rosa Avenue. The site is developed as a U-Haul Moving and Storage Facility and surrounded by a mix of industrial and commercial uses, such as auto body shops, self-storage facilities, and construction equipment rentals.

The project site is zoned M1 and is within the VOH Combining District and the SR Combining District. The project is proposing to demolish the existing on-site structures and redevelop the site with a new U-Haul Moving and Storage Facility. The proposed project would also include a surface parking lot with 28 spaces, on- and off-site utility connections, landscaping, and frontage improvements. Development of a personal storage facility in the M1 zoning district is an allowed use with the approval of a Use Permit. The new facility would include a 4,745 square foot retail building and a 116,600 square foot self-storage building. The proposed retail building would have a maximum height of 20 feet, and the self-storage building would have a maximum height of 64 feet. The proposed project would also include a surface parking lot with 28 spaces, on- and off-site utility connections, landscaping, and frontage improvements.

The proposed project would be consistent with the existing on-site use and the surrounding land uses. The proposed project would also comply with the development standards for the M1 zoning district, including the maximum height requirements, which allows buildings up to 65 feet tall. As the project site is within the SR Combining District, the proposed project would also be subject to Section 26-64-030 of the Sonoma County Municipal Code which requires a building setback of 20 feet for scenic corridor properties along U.S. 101. The project site is also within the VOH Combining District, which is intended to protect, preserve, and enhance valley oak woodland habitat. The proposed project does not involve the removal of any trees or valley oak woodland habitat and therefore would not conflict with the requirements of the VOH Combining District.

The proposed project would be subject to design review in accordance with Article 82 of the Sonoma County Municipal Code. Additionally, the proposed project would be subject to the Urban Design Guidelines for the South Santa Rosa Area Plan. Compliance with the County's design review process, Urban Design Guidelines for the South Santa Rosa Area Plan, and Sonoma County Municipal Code would ensure the project design is compatible with the surrounding land uses. As such, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality, and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime view in the area?

Comment:

The project site is in an urbanized area and currently developed as an existing U-Haul Moving and Storage Facility. The project site currently contains sources of nighttime lighting, such as the exterior

building lighting and parking lot lighting. Additional sources of nighttime lighting include street lighting, lighting from vehicles traveling on the adjacent streets and highway, and exterior lighting associated with the surrounding developments. Glare is also generated at the project site and the adjacent developments from the parked trucks and trailers and windows on the buildings.

The proposed project would provide exterior lighting along the site perimeter and at each building entrance. The perimeter lighting would be mounted on four new 25-foot poles and two existing 25-foot poles. Three fixtures would be provided along the western side of the retail building. Five lighting fixtures would also be provided at the southern entrance of the self-storage building, and one fixture at the northeastern corner to illuminate the emergency exit doorway. All lights would be LED and would be shielded to reduce light spill onto adjacent properties. Additionally, the proposed project would be subject to design review in accordance with Article 82 of the Sonoma County Municipal Code and the lighting requirements outlined in the South Santa Rosa Area Plan. Compliance with the County's design review process and the lighting requirements for the South Santa Rosa Area Plan would ensure that the project design and exterior lighting fixtures would not affect day- or nighttime views in the area. Therefore, the proposed project would not create a new source of substantial light or glare, and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation (DOC) as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection (CAL FIRE) regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

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?

Comment:

The project site is in an urbanized area and currently developed as an existing U-Haul Moving and Storage Facility. According to the DOC's Important Farmland Finder, the project site and surrounding area are designated Urban and Built-Up Land (DOC 2022). The project site does not contain prime farmland, unique farmland, or farmland of statewide importance; therefore, the proposed project would have no impact on important farmland.

Significance Level:

No Impact.

b) Conflict with existing zoning for agricultural use, or Williamson Act Contract?

Comment:

The project site is zoned M1 and within the VOH and SR Combining Districts. Pursuant to Chapter 26 of the Sonoma County Municipal Code, the M1 zoning district provides areas for extensive industrial development or industrial development within designated urban service areas. The VOH combining district is intended to protect and enhance valley oaks and valley oak woodland habitat and establishes specific provisions for on-site landscaping and the removal of valley oak trees. The purpose of the SR Combining District is to preserve the visual character and scenic resources of lands in Sonoma County.

Though some agricultural uses are permitted under the M1 zoning district, the project site is fully developed as a U-Haul Moving and Storage Facility and does not contain any lands contracted under the Williamson Act. The proposed project would redevelop the existing U-Haul Moving and Storage Facility with a new 4,745 square foot retail building and a 116,600 square foot self-storage building. As the site would be redeveloped with the same use, the proposed project would not conflict with existing zoning for agricultural uses or a Williamson Act contact and there would be no impact.

Significance Level:

No Impact.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)?

Comment:

Under PRC Section 12220(g), “Forest land” is land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The project site is in an urbanized area and currently developed as an existing U-Haul Moving and Storage Facility. It does not contain any forestry resources, timberland production zones, or active timberland uses, and does not meet the definition of “forest land” as defined by PRC Section 12220(g). Furthermore, the project site is zoned M1, which does not permit timberland production uses. The proposed project would not conflict with existing zoning for, or cause rezoning of forestland, timberland, or timberland zoned Timberland Production and no impact would occur.

Significance Level:

No Impact.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

Comment:

The project site is in an urbanized area and currently developed as an existing U-Haul Moving and Storage Facility. The project site does not contain forestry resources, timberland resource zones, or active timberland production. As such, the proposed project would not result in the loss of forestland or convert forestland to non-forest use. No impact would occur.

Significance Level:

No Impact.

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?

Comment:

The project site is within an urbanized area and does not contain agricultural resources, lands contracted under the Williamson Act, forestland, or timberland resources. The lands surrounding the project site have been developed with commercial and industrial uses and therefore do not contain agriculture or forestry resources. The proposed project would not cause changes to the existing environment that could result in the conversion of farmland outside the project site boundary to non-agricultural use or the conversion of forestland to non-forest uses. No impact would occur.

Significance Level:

No Impact.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Comment:

Air districts are required to prepare air quality plans to identify strategies to bring regional emissions into compliance with federal and state air quality standards. Air districts establish emissions thresholds for individual projects to demonstrate the point at which a project would be considered to increase the air quality violations. A project would conflict with the applicable air quality plan if they exceeded any emissions thresholds for which the region is in nonattainment for.

The Bay Area Air Quality Management District (BAAQMD) region is designated as nonattainment for federal and state ozone and particulate matter (measured both in units smaller than 2.5 microns in diameter [$PM_{2.5}$] and in units of particulate matter smaller than 10 microns in diameter [PM_{10}]). Accordingly, the BAAQMD has prepared air quality plans, including the 2017 Clean Air Plan, to achieve attainment of the applicable ozone and PM standards. The BAAQMD's adopted thresholds of significance indicate the levels of emissions that projects may emit while the region still moves toward attainment of the California Ambient Air Quality Standards and National Ambient Air Quality Standards. Projects that exceed thresholds would be considered to conflict with the 2017 Clean Air Plan.

As described under Impact AIR-b, the proposed project would not exceed the thresholds established by the BAAQMD. As a result, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan, and the impact would be less than significant.

Significance Level:

Less than Significant Impact.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?

Comment:

In developing thresholds of significance for air pollutants, the BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. The analysis below is based on the Air Quality and Greenhouse Gas Impact Assessment prepared by Stantec Consulting Services Inc. (Stantec) in May 2025 (Appendix A). Construction and operational emissions for the proposed project were modeled using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.14. As discussed in the Air Quality and Greenhouse Gas Impact Assessment, project construction would take place between May 2026 and March 2028. Construction was modeled from August 2024 through March 2026. The modeled construction schedule is more conservative as it is condensed requiring more construction activities and, by extension, more air emissions per day. Moreover, off-road and on-road equipment generally becomes more efficient as time progresses due to the implementation of regulations and advancements in technology.

Therefore, modeling emissions to begin in 2024 is a conservative approach.

Construction Emissions

As shown in Table 5, the project's average daily construction emissions fall below BAAQMD project-level thresholds. The emissions were modeled to occur between 2024 to 2026. Actual construction would occur between 2026 to 2028, therefore actual emissions would likely be lower than what is presented in Table 5. Additionally, the updated construction schedule would result in longer periods of overlap between phases. However, as shown in the table, even in the event that all phases overlap, emissions would still fall below BAAQMD thresholds. As such, the project's construction emissions would not result in a cumulatively considerable net increase in criteria air pollutant emissions and the impact would be less than significant.

Table 5: Project Construction Emissions (lbs/day)

Year	ROG	NOx	PM_{10} (exhaust)	$PM_{2.5}$ (exhaust)
2024	0.70	5.07	0.19	0.17
2025	3.88	6.11	0.20	0.19
2026	0.15	0.81	0.03	0.02
Average Daily Thresholds	**54**	**54**	**82**	**54**
Exceed?	**No**	**No**	**No**	**No**

Operational Emissions

In addition to project-specific thresholds, the BAAQMD identified screening criteria to provide lead agencies and project applicants with a conservative indication of whether the proposed project could result in potentially significant air quality impacts. If all screening criteria are met by a proposed project, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. The project proposes to construct a total of 121,345 square feet of new industrial building space (including the storage units and retail buildings). The BAAQMD criteria air pollutant screening criteria thresholds for general heavy and general light industrial operational emissions are 1,009,000 square feet and 998,000 square feet, respectively (BAAQMD 2022a). The unit count for the proposed project falls below the operational screening thresholds, therefore a detailed air quality analysis for operation is not required. Impacts are considered less than significant and operational emissions would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. The impact would be less than significant.

Significance Level:

Less than Significant Impact.

c) Expose sensitive receptors to substantial pollutant concentrations?

Comment:

This discussion addresses whether the proposed project would expose sensitive receptors to construction-generated fugitive dust (PM_{10}), naturally occurring asbestos (NOA), construction-generated diesel particulate matter (DPM), operational related toxic air contaminants (TACs), or operational CO hotspots. According to the California Air Resources Board (CARB), some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, or duration of exposure to air pollutants. Children, pregnant women, the elderly,

and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, childcare centers, playgrounds, retirement homes, convalescent homes, hospitals, and medical clinics.

Construction Emissions

During construction associated with the proposed project, the potential exists for emissions of fugitive dust, NOA, and DPM to be released. Each TAC is discussed separately below.

Fugitive Dust

Fugitive dust would be generated from site grading and other earth-moving activities. Most of this fugitive dust would remain localized and would be deposited near the project site. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from the project site. All projects within the jurisdiction of the BAAQMD are required to implement all of the BAAQMD's Basic Construction Mitigation Measures, as well as comply with Regulation 6, Particulate Matter and Visible Emissions. Implementation of these measures would minimize construction-related fugitive dust emissions and the impact would be less than significant.

Naturally Occurring Asbestos

Construction in areas of rock formations that contain NOA could release asbestos to the air and pose a health hazard. BAAQMD enforces CARB's air toxic control measures at sites that contain ultramafic rock. The Air Toxic Control Measures for Construction, Grading, Quarrying and Surface Mining Operations were signed into state law on July 22, 2002, and became effective in November 2002. The purpose of this regulation is to reduce public exposure to NOA. A review of the map with areas more likely to have rock formations containing NOA in California indicates that there is no asbestos in the immediate project area (USGS 2011). Therefore, construction of the proposed project would not expose sensitive receptors to NOA.

Diesel Particulate Matter

Exposure to DPM from diesel vehicles and off-road construction equipment can result in health risks to nearby sensitive receptors. A health risk assessment was prepared in accordance with BAAQMD and the Office of Environmental Health Hazard Assessment guidance. As shown in Table 6, the health risk posed to the maximum worker receptor would not exceed thresholds, however the risk posed to the maximum exposed individual receptor would exceed BAAQMD thresholds of 10 in one million. As such, the proposed project would be required to implement Mitigation Measure AIR-1 that would require the use of Tier 4 equipment. Implementation of Mitigation Measures AIR-1 would reduce the risk at the maximum exposed individual receptor to less than significant levels. Health risk output files are provided in Appendix A.

Table 6: Construction Health Risk Assessment Results

Receptor	Cancer Risk Per Million	Chronic Inhalation Hazard Index	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Unmitigated			
Residential	28.90	0.021	0.105
Worker	6.24	0.072	0.359
Threshold	**10.0**	**1.0**	**0.30**
Exceed?	**Yes**	**No**	**No**
Mitigated			

Receptor	Cancer Risk Per Million	Chronic Inhalation Hazard Index	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Residential	8.49	0.006	0.031
Threshold	**10.0**	**1.0**	**0.30**
Exceed?	**No**	**No**	**No**

Operational Emissions

The greatest potential for exposure to TACs during long-term operations is from the use of heavy-duty diesel trucks and stationary generators that use diesel fuel. Once operational, the majority of vehicle trips to the project site would be from workers and customers. The proposed project may generate a few diesel trucks from trash collection and from customers bringing trucks to load and unload their storage unit; however, these activities would be consistent with the current use of the site as a U-Haul Moving and Storage Facility. As such, once operational, the proposed project would not be expected to expose nearby sensitive receptors to substantial amounts of TACs and the impact would be less than significant.

Significance Level:

Less than Significant Impact with Mitigation

Mitigation:

Mitigation AIR-1: Minimize Construction Exhaust Emissions. Exhaust emissions shall be minimized during construction activities with the use of off-road equipment engines that meet or exceed CARB's Tier 4 Final engine emissions standards for off-road equipment exceeding 50 horsepower. At a minimum, all construction equipment shall be certified as compliant with the Tier 4 Final engine emissions standards as provided in the California Code of Regulations, Title 13, Section 2423(b)(1)(B). Engines can achieve these standards through the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, or other options as they become available.

Monitoring: Prior grading permit issuance, the Planning Division shall verify the required mitigation language is printed on the approved grading plan set.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Comment:

While offensive odors rarely cause any physical harm, they can still be unpleasant, leading to distress among the public and often generating citizen complaints to local governments and BAAQMD. The occurrence and severity of odor impacts depends on numerous factors, including nature, frequency, and intensity of the source, the wind speed and direction, and the sensitivity of the receptor.

Construction activities associated with the proposed project could result in short-term odorous emissions from diesel exhaust associated with diesel-fueled equipment. However, these emissions would be intermittent and would dissipate rapidly from the source. Project construction would also be required to comply with all applicable BAAQMD rules and regulations, particularly associated with permitting of air pollutant sources. Compliance with the aforementioned regulations would help to minimize emissions, including emissions leading to odors.

Land uses typically associated with the production of odors during operations include wastewater treatment facilities, waste disposal facilities, and agricultural operations. The proposed project does not include any land uses that are typically associated with emitting objectionable odors and operation would be similar to existing conditions. As such, the proposed project would not result in other emissions, such as those leading to odors, affecting a substantial number of people. The impact would be less than significant.

Significance Level:

Less than Significant Impact.

4. BIOLOGICAL RESOURCES

Would the project:

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 or U.S. Fish and Wildlife Service?

Comment:

The project site is currently entirely paved and with landscaping limited to grasses, hackberry trees, and a few redwood trees located along the site perimeter. Additionally, the project site is located in a highly urbanized area surrounded by industrial and commercial developments, and roadways. Therefore, there are no candidate, sensitive, or special-status species that occur on-site and the project site does not provide any potential habitat for candidate, sensitive, or special-status species. Therefore, the proposed project would not 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS) and there would be no impact.

Significance Level:

No Impact.

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 or U.S. Fish and Wildlife Service?

Comment:

The project site is in an urbanized area and fully developed with several buildings associated with the existing U-Haul Moving and Storage Facility. Landscaping is limited to grasses, hackberry trees, and a few redwood trees along the site perimeter. Due to the developed nature of the project site and surrounding area, the project site does not contain riparian habitat or other sensitive natural communities. Therefore, the proposed project would have no impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations, or by CDFW or USFWS.

Significance Level:

No Impact.

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?

Comment:

As discussed, the project site is in an urbanized area and fully developed with several buildings associated with the existing U-Haul Moving and Storage Facility. Due to the developed nature of the project site and surrounding area, there are no State or federal protected wetlands located within or adjacent to the project site. Therefore, the proposed project would not result in a substantial adverse effect on State or federally protected wetlands and there would be no impact.

Significance Level:

No Impact.

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?

Comment:

Habitat corridors are segments of land that provide linkages for wildlife movement between different habitats while also providing cover. Corridors also function as avenues along which plants can propagate, genetic interchange can occur, populations can move in response to environmental changes and natural disasters, and populations can be replenished from other areas. Habitat corridors often consist of riparian areas along streams, rivers, or other natural features. Habitat corridors have been recognized by federal agencies, such as the USFWS, and the State as important habitats worthy of conservation. In general, movement corridors consist of areas of undisturbed land cover that connect larger, contiguous habitats. The project site is in an urbanized area and fully developed with several buildings associated with the existing U-Haul Moving and Storage Facility. Due to the developed nature of the project site and surrounding area, the project site is not used by wildlife as a migratory wildlife corridor or as a native wildlife nursery site. Therefore, the proposed project would not interfere with the movement of wildlife or impede the use of wildlife corridors or wildlife nursery sites and there would be no impact.

Significance Level:

No Impact.

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

Comment:

The project site is within the VOH Combining District which is to protect, preserve, and enhance valley oak woodland habitat. The proposed project does not involve the removal of any trees, including valley oak woodland habitat. The proposed project would provide approximately 26,252 square feet of landscaped areas along the perimeter of the site and adjacent to the proposed buildings. The proposed landscaping would include approximately 34 new trees, such as Chinese Hackberry, Desert Willow, and Valley Oak, as well as planting areas, which would include species such as Foxtail Agave, Arabian Aloe, Pink Parade Red Yucca, and others. The eastern side of the retail building, which faces Santa Rosa Avenue, would feature a green screen with seasonal vines. All landscaping would comply with Chapter 7D3, Water Efficient Landscape, of the Sonoma County Municipal Code, as well as the provisions set forth in the VOH Combining District. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

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?

Comment:

As outlined on Sonoma County's website, as of 2024, the County of Sonoma Permit Sonoma, in collaboration with other interested local governments and agencies, has initiated the process of planning and developing a county-wide Habitat Conservation Plan and a Natural Community Conservation Plan (Sonoma County 2025). However, these plans are still in the planning process and no such plans have been adopted at this time. Additionally, the proposed project site is entirely paved and does not provide habitat for any special-status species, nor does it include any natural habitats that could be protected under a Habitat Conservation Plan or a Natural Community Conservation Plan. Therefore, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan and there would be no impact.

Significance Level:

No Impact.

5. CULTURAL RESOURCES

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Comment: The analysis provided below pertains to Impact CUL-a and CUL-b outlined above. The analysis is based on the Cultural Resources Technical Memorandum prepared by Stantec in April 2024. The cultural resources assessment was conducted to satisfy the requirements of CEQA and follows CEQA Appendix G Guidelines.

As discussed in the Cultural Resources Technical Memorandum (Appendix B), Stantec conducted archival and background research to identify cultural resources on, or in the vicinity of, the project site and assess the potential for subsurface archaeological deposits. Background research consisted of a records search at the Northwest Information Center at Sonoma State University, a review of the Native American Heritage Commission's (NAHC's) Sacred Lands File (SLF) in Sacramento, and a review of archival maps and aerial photographs.

During the background research, no previously recorded cultural resources were identified in or within the project site, and no resources were located within 0.25-miles of the project site. The project site is underlain by Older Quaternary alluvium and marine deposits, including lake, playa, and terrace deposits. The project site is approximately 0.16-miles east of an unnamed channelized seasonal creek, and 1.2 miles east of Colgan Creek. A review of available historical maps and aerial imagery suggests the site was developed (i.e., graded and paved) around 1982, which could potentially impact the integrity of any subsurface deposits. The project site is located relatively far from a freshwater source or any other substantial landscape features (which are often associated with pre-contact habitation sites) and has been subject to ground disturbance, indicating the risk of encountering buried pre-contact era deposits is low.

Additionally, on the 1916 and 1947 U.S. Geological Survey (USGS) maps, no buildings or features are visible within the project site. The earliest available aerial imagery shows that in 1952, a structure appears in the northeast corner of the project site, which appears to be related to the agricultural buildings complex located on the parcel immediately north of the project site. The site was undeveloped but surrounded by agricultural fields. After the structure was razed, the site remained apparently unused until around 1982, when the asphalt and buildings currently on-site were constructed. The map review suggests that the project site was not developed until the mid-20th century, and at a small, household scale. As a result, the potential for intact buried historic-era deposits (i.e., features) is low.

The project site has been previously excavated, graded, and developed and therefore, the potential for project construction to encounter undiscovered cultural resources is low. As the risk of encountering buried pre-contact era deposits and intact buried historic-era deposits is low, the proposed project is not anticipated to result in impacts to historical or archaeological resources. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 or an archaeological resource pursuant to Section 15064.5 and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

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

Comment:

There are no known human remains located on-site. As stated previously, the project site is located relatively far from a freshwater source or any other substantial landscape features (which are often associated with pre-contact habitation sites) and has been subject to ground disturbance, indicating the risk of encountering buried pre-contact era deposits, including Native American human remains, is low. The project site has been previously excavated, graded, and developed and therefore, the potential for project construction to encounter undiscovered human remains is low. In the event of an accidental discovery or recognition of human remains during project related construction activities, the proposed project would be required to comply with California Public Resources Code Section 5097.98.

Additionally, the maximum depth of excavation for the project would be relatively shallow at approximately 36 inches bgs. As the project site has been previously disturbed and the proposed project would not require significant excavation activities, the proposed project's potential to encounter undiscovered human remains at the site is low. Therefore, the proposed project would not be anticipated to disturb any human remains, including those interred outside of formal cemeteries and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

6. ENERGY

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Comment:

Petroleum fuel (gasoline and diesel) would be the primary energy resource expanded over the course of construction. Transportation of construction materials and construction workers would result in the consumption of gasoline and diesel. Heavy-duty off-road equipment would require diesel. Specifically, Project construction would require approximately 89,605 gallons of diesel for off-road equipment and 7,295 gallons of diesel or gasoline for on-road vehicles. In 2024, approximately 13.4 billion gallons of gasoline and 3.5 billion gallons of diesel were sold in California (CEC 2025a, CEC2025b). Therefore, the combined gasoline and diesel use in construction would represent approximately 0.0006 percent of the annual gasoline and diesel sold within the State. Overall, the use of petroleum products during construction of the Project would be short-term and would comply with applicable state and local regulations and requirements. Moreover, natural gas is not anticipated to be used within construction and electricity use would be negligible.

The proposed project would redevelop an existing U-Haul Moving and Storage Facility. The new facility would use approximately 1.7 MWh/year and 5 million British Thermal Unit per year (MMBTu/year). Sonoma County consumed approximately 2,880 GWh and 107 millions of therms of natural gas in 2022 (CEC 2016a, CEC 2016b). Therefore, project electricity and natural gas consumption would represent approximately 0.000006 percent and 0.00005 percent respectively, of the County annual use. The project site would also result in a net increase of 160 vehicle trips per year leading to a net increase of 13,080 gallons of petroleum fuel (gasoline and diesel) per year. Project operational petroleum fuel use would represent approximately 0.00008 percent of the annual gasoline and diesel sold within the State. As such, energy use is anticipated to be less than significant.

Significance Level:

Less than Significant Impact.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Comment:

The proposed project would not conflict with the energy goals or policies of the General Plan or other policies and plans aimed at reducing GHG emissions. The proposed project would constitute development within an established community and would not be opening up a new geographical area for development such that it would draw mostly new trips or substantially lengthen existing trips. The proposed project would comply with the versions of CCR Titles 20 and 24, including California Green Building Standards Code (CalGreen), that are applicable at the time that building permits are issued and with all applicable County measures. As such, impacts related to the project's potential to conflict with plans for renewable energy and energy efficiency have been adequately addressed and would be less than significant.

Significance Level:

Less than Significant Impact.

7. GEOLOGY AND SOILS

Would the project:

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 Special Publication 42.

Comment:

As discussed in the Geotechnical Study Report prepared for the proposed project in November 2023 by RGH Consultants, the project site is not within an area that would indicate the presence of active faults and the site is not within a current Alquist-Priolo Earthquake Fault Zone (Appendix C). The nearest active fault is the Rodgers Creek-Healdsburg Fault located more than 13 miles west of the project site (CGS 2022). Due to the lack of Alquist-Priolo fault zones in the project site, the potential for fault rupture of a known earthquake fault at the project site is very low. Therefore, impacts associated with surface rupture from a known earthquake fault would be less than significant.

Significance Level:

No Impact.

ii. Strong seismic ground shaking?

Comment:

The project site is in a seismically active region and earthquake-related ground shaking is expected to occur during the design life of the proposed project. The nearest major active fault is the Rodgers Creek-Healdsburg Fault located more than 13 miles west of the project site (CGS 2022). In addition, other faults in the San Francisco Bay Area may cause strong seismic ground shaking at the project site. The proposed project would be constructed in conformance with the latest edition of the California Building Code, which includes engineering standards appropriate to withstand anticipated ground accelerations at the project site. Conformance with the earthquake design parameters of the California Building Code would be subject to County review as part of the building site plan review and building permit review process. Furthermore, the Geotechnical Study Report includes recommendations related to the seismic design of the proposed project. The proposed project would be required to implement the recommendations of the Geotechnical Study Report into the project design as part of Mitigation Measure GEO-1 to address potential ground accelerations at the site. Therefore, impacts related to ground shaking at the project site would be less than significant with implementation of Mitigation Measure GEO-1.

Significance Level:

Less than Significant with Mitigation

Mitigation Measures:

Mitigation GEO-1: Applicant shall incorporate all design recommendations contained within the

project-specific geotechnical report prepared for the proposed project into relevant project plans and specifications. The project site plans shall be submitted to the County and reviewed as part of the development review process.

Monitoring GEO-1: Prior to granting Planning Division clearance for issuance of building permits, applicant shall confirm its submittal of the required geotechnical recommendations for review and clearance by the Permit Sonoma Building and Engineering Divisions.

iii. Seismic-related ground failure, including liquefaction?

Comment:

According to the Geotechnical Study Report, subsurface conditions at the project site generally consist of 1.5 to 4 feet of weak, compressible, clayey soil. This soil appears hard and strong when dry but becomes weak and compressible as its moisture content increases towards saturation (Appendix C). Groundwater was encountered at depths ranging from 11 to 15.5 feet bgs. Granular soil was encountered at the site below the groundwater table; therefore, the Geotechnical Study Report completed a liquefaction analysis for the site. Based on the anticipated ground acceleration at the site during an earthquake and the soil composition, the Geotechnical Study Report determined there is potential for liquefaction to occur at the site. There are three potential consequences of liquefaction: bearing capacity failure, lateral spreading toward a free face (e.g. riverbank), and settlement. The Geotechnical Study Report the potential for bearing capacity failure and lateral spreading to occur at the site is low. The Geotechnical Study Report determined that for soil layers encountered at 17 feet below the surface, total settlement ranging from 0.75 to 1-inch. Differential settlement could range from 0.75 to 1-inch across the building (Appendix C). As discussed, the project design would be required to conform the latest edition of the California Building Code. Additionally, the Geotechnical Study Report prepared for the proposed project includes recommendations related to foundations and settlement, grading, and seismic design to minimize potential impacts related to liquefaction. The proposed project would be required to implement the recommendations of the Geotechnical Study Report into the project design as part of Mitigation Measure GEO-1. Therefore, impacts related to liquefaction would be less than significant with implementation of Mitigation Measure GEO-1.

Significance Level:

Less than Significant with Mitigation

Mitigation Measures:

Implement Mitigation GEO-1.

iv. Landslides?

Comment:

The project site and surrounding areas are relatively flat and are not located in a landslide hazard area. According to Figure PS-1d of the County's General Plan Safety Element, the project site is not located within or adjacent to an identified landslide hazard area and therefore, the proposed project would not be at risk of landslide impacts. There would be no impact.

Significance Level:

No Impact.

b) Result in substantial soil erosion or the loss of topsoil?

Comment:

The proposed project would disturb the entire 3-acre site. Construction activities would require demolition, grading, foundation work, utility connections, internal roadway construction, building construction, frontage improvements, and landscaping on the project site. It is estimated demolition activities would remove up to 4,000 CY of materials from the site. The total amount of earth movement for the proposed project would require approximately 2,000 CY of cut and approximately 3,000 CY of fill. The maximum depth of excavation is anticipated to be approximately 36 inches bgs.

These activities could expose unprotected soils to stormwater runoff, causing erosion and loss of topsoil. Projects that disturb 1 acre or more of soils during construction are required to comply with the National Pollutant Discharge Elimination System (NPDES) permitting program and implement a Stormwater Pollution Prevention Plan (SWPPP) that identifies best management practices (BMPs) to control the discharge of sediment and other pollutants during construction. As described in Section 10, Hydrology and Water Quality, the proposed project would implement a SWPPP and associated BMPs as part of Mitigation Measure HYD-1 to minimize erosion impacts. Therefore, soil erosion impacts associated with construction impacts would be less than significant with implementation of Mitigation Measure HYD-1.

Significance Level:

Less than Significant Impact with Mitigation

Mitigation Measures:

Implement Mitigation HYD-1

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?

Comment:

As discussed, the project site and surrounding area contains generally flat topography and are not identified within a landslide hazard area. The Geotechnical Study Report determined there is potential for liquefaction to occur at the site. Additionally, the potential for bearing capacity failure and lateral spreading to occur at the site is low. For soil layers encountered at 17 feet below the surface, total settlement would range from 0.75 to 1-inch. Differential settlement could range from 0.75 to 1-inch across the building (Appendix C). The project design would be required to conform the latest edition of the California Building Code. Additionally, the Geotechnical Study Report prepared for the proposed project includes recommendations related to foundations, settlement, and site grading minimize potential impacts related to liquefaction and lateral spreading. The proposed project would be required to implement the recommendations of the geotechnical investigation into the project design as part of Mitigation Measure GEO-1. Therefore, impacts related to unstable soils would be less than significant with Mitigation Measure GEO-1 incorporated.

Significance Level:

Less than Significant with Mitigation

Mitigation Measures:

Implement Mitigation GEO-1.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Comment:

The Geotechnical Study Report indicates the subsurface conditions at the project site consist of 1.5 to 4 feet of weak, compressible, clayey soil. This soil appears hard and strong when dry but becomes weak and compressible as its moisture content increases towards saturation (Appendix C). This soil exhibits low to high plasticity and low to moderate expansion potential. The surface soil is locally covered by 1 to 5 feet of heterogeneous fill. Heterogeneous fill is a material with varying density, strength, compressibility, and shrink-swell characteristics that often has an unknown origin and placement history. These surface materials are underlain by clay with varying amounts of sand, sand with varying amounts of clay, gravel with varying amounts of clay.

Expansive surface soil shrinks and swells as it loses and gains moisture throughout the yearly weather cycle. Near the surface, the resulting movement can heave, and crack lightly loaded shallow foundations (spread footings) and slabs and pavements. The Geotechnical Study Report prepared for the proposed project includes recommendations related to foundations and excavations to address potential impacts from the on-site expansive soils. The proposed project would be required to implement the recommendations of the Geotechnical Study Report into the project design as part of Mitigation Measure GEO-1. Additionally, the proposed project would be required to comply with the latest edition of the California Building Code to ensure that the proposed project is designed and engineered to address expansive soils. Therefore, impacts related to expansive soils would be less than significant with Mitigation Measure GEO-1 incorporated

Significance Level:

Less than Significant with Mitigation

Mitigation Measure:

Implement Mitigation GEO-1

d) 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?

Comment:

The proposed project would not include use of septic tanks or alternative waste disposal systems. The proposed project would connect to the existing sewer system in the area. Therefore, there would be no impact.

Significance Level:

No Impact.

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

Comment:

There are no known unique paleontological resource or geologic feature at the project site. The project site is developed with an existing U-Haul Moving and Storage Facility and has been previously excavated and graded from previous development activities. Additionally, the maximum depth of excavation for the project would be relatively shallow at approximately 36 inches bgs. As the project site has been previously disturbed and the proposed project would not require significant excavation activities, the proposed project's potential to discover unknown paleontological resources or geologic features at the site is low. Therefore, the proposed project would not directly or indirectly destroy a unique paleontological feature or unique geological feature and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

8. GREENHOUSE GAS EMISSIONS

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Comment:

The following analysis is based on the Air Quality and Greenhouse Gas Impact Assessment prepared by Stantec in May 2024 (Appendix A). Construction and operational emissions for the proposed project were modeled using the CalEEMod version 2022.1.1.14. The model output and detailed assumptions are provided in Appendix A.

In April 2022, the BAAQMD Board of Directors adopted CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans, which updated the BAAQMD's previous guidance related to evaluating GHG emissions to address the most recent climate legislation.

Because construction emissions are temporary and variable, the BAAQMD has not developed a quantitative threshold of significance for construction related GHG emissions. However, BAAQMD recommends that construction related GHG emissions should still be quantified and disclosed in environmental documents.

For land use projects, the BAAQMD considers a project to have a less than significant impact related to GHG emissions if it either (1) meets specific project design elements, or (2) is consistent with a local GHG reductions strategy that meets the requirements of CEQA Guidelines Section 15183.5(b) (BAAQMD 2022b).

The proposed project would be subject to Sonoma County's Climate Action Plan (CAP): 2020 and Beyond that was approved in 2016. The County's CAP focuses on near-term actions that will be implemented to reduce countywide GHG emissions to a level that is 25 percent 1990 levels by 2020. The measures within the CAP will reduce emissions beyond 2020 and set the County on the trajectory to meet emission reductions of 40 percent by 2030 and 80 percent by 2050. The CAP includes a consistency checklist template to determine individual project consistency.

Construction Emissions

As discussed, the BAAQMD's applicable thresholds for the significance of GHG emissions are qualitative. Therefore, the following GHG emissions inventories are provided for informational purposes. The potential impacts related to GHG emissions resulting from implementation of the project are considered in comparison to BAAQMD's adopted thresholds of significance.

Construction GHGs would be emitted by the off-road construction equipment and vehicle travel by workers and material deliveries to the project site. The estimated construction GHG emissions are shown in Table 7.

Table 7: Construction Greenhouse Gas Emissions

Construction Year	Emissions ($MTCO_2e$)
2024	366
2025	440
2026	58.7

Construction Year	Emissions ($MTCO_2e$)
Total	**864.7**

Source: Appendix A

Operational Emission Inventory

Operational, or long-term, emissions occur over the life of the proposed project. Operational activities of the proposed project would generate GHG emissions primarily from mobile sources. Operational GHG emissions are shown in Table 8.

Table 8: Operational Greenhouse Gas Emissions

Source	Emissions ($MTCO_2e$ per year)
Mobile	125
Area	1.78
Energy	383
Water	48.5
Waste	46.7
Refrigerants	35.03
Total	**640**

Note: Totals may not sum due to rounding.
Source: Appendix A

As shown in the table above, the proposed project would emit approximately 610 $MTCO_2e$ per year. Consistent with BAAQMD guidance, emissions were determined to be less than significant based on consistency with the applicable CAP. As discussed in Impact GHG-b, the proposed project would be consistent with the CAP and CARB's Scoping Plan and, as a result, the impact is less than significant.

Significance Level:

Less than Significant Impact.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Comment:

A project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the CEQA Guidelines. Pursuant to Appendix G of the CEQA Guidelines, a significant GHG impact is identified if the project could conflict with applicable GHG reduction plans, policies, or regulations.

The project would be required to comply with the County's CAP, Senate Bill (SB) 32, and Assembly Bill (AB) 1279. The CARB's 2022 Scoping Plan sets a framework for California to meet the reduction targets of SB 32 and AB 1279 (CARB 2022). As such, the project's consistency with the County's CAP and CARB's 2022 Scoping Plan is evaluated below.

Consistency with Sonoma County's Climate Action Plan: 2020 and Beyond

The County CAP was approved in 2016 to direct the County to reduce GHG emissions. The CAP includes a checklist for individual developments to determine consistency. The checklist is provided as Appendix C to the Air Quality and Greenhouse Gas Impact Assessment (Appendix A) and demonstrates that the proposed project would be consistent with the applicable measures under the CAP.

Consistency with the 2022 Scoping Plan

CARB approved the 2022 Scoping Plan in December 2022. The 2022 Scoping Plan builds upon previous iterations of state scoping plans to achieve carbon neutrality and reduce anthropogenic GHG emissions 85 percent below 1990 no later than 2045, as directed by AB 1279. Table 9 identifies the Scoping Plan policies that are applicable to the proposed project.

Table 9: Project Consistency with 2022 Scoping Plan Greenhouse Gas Reduction Strategies

Measure	Consistency Determination
Deploy zero emission vehicles (ZEVs) and reduce driving demand	**Consistent.** While the proposed project itself would not deploy ZEVs, the proposed project would provide EV charging stations to support the use of ZEVs consistent with CalGreen standards.
Coordinate supply of liquid fossil fuels with declining California fuel demand	**Not Applicable.** This measure is aimed at petroleum refineries and fossil fuel extraction operations. The proposed project would not interfere with this goal.
Generate clean electricity	**Not Applicable.** The proposed project is not required to include solar paneling or other clean energy generation systems. The proposed project would redevelop the existing U-Haul Moving and Storage Facility with a new 4,745 square foot retail building and a 116,600 square foot self-storage building. The new buildings would be constructed in accordance with the latest CalGreen standards. As such, the proposed project would require less electricity per square foot than the existing facility. Moreover, the proposed project would receive electricity from a utility provider that would be required to comply with the Renewable Portfolio Standard that would advance clean electricity.
Decarbonize Buildings	**Consistent.** The proposed project would demolish the existing U-Haul Moving and Storage Facility and construct a new 4,745 square foot retail building and a 116,600 square foot self-storage building. The new buildings would be constructed in accordance with the latest CalGreen standards. As such, the proposed project's buildings would result in less GHG emissions than the existing structures.
Decarbonize Industrial Energy Supply	**Not Applicable.** The proposed project involves the development of a new moving and storage facility and would not affect industrial energy supply.
Reduce non-combustion emissions (Methane)	**Consistent.** The proposed project would not include any land uses that generate significant levels of methane, such as landfills or dairy farms.
Reduce non-combustion emissions	**Consistent.** The proposed project will comply with all state regulations governing short-lived climate pollutants, including hydrofluorocarbons.
Compensate for remaining emissions	**Not Applicable.** This measure is aimed at the state government to reduce statewide emissions to meet AB 1279 goals.

Source: CARB 2022

This analysis finds the proposed project would be consistent with all feasible and applicable strategies recommended in the 2022 Scoping Plan Update. As such, the proposed project would not conflict with an applicable plan adopted for the purpose of reducing GHG emissions; therefore, impacts would be less than significant.

Significance Level:

Less than Significant Impact.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Comment:

Construction

During construction, small quantities of potentially toxic substances (e.g., petroleum and other chemicals used to operate and maintain construction equipment) would be used and transported to and from the project site as needed. Accidental releases of small quantities of hazardous materials or toxic substances could contaminate soils and degrade the quality of surface water and groundwater, resulting in a public safety hazard. However, contractors would be required to transport, store, and handle hazardous materials and toxic substances related to construction activities in accordance with relevant regulations and guidelines, including California Health and Safety Codes and City ordinances. Regulatory requirements for the transport of hazardous wastes in California are specified in Title 22 of CCR, Division 4.5, Chapters 13 and 29. In accordance with these regulations, transport of hazardous materials must comply with the California Vehicle Code, California Highway Patrol regulations (contained in CCR, Title 13); the California State Fire Marshal regulations (contained in CCR, Title 19); United States Department of Transportation regulations (Code of Federal Regulations, Title 49); and USEPA regulations (contained in Code of Federal Regulations, Title 40). The use of hazardous materials is also regulated by DTSC (CCR, Title 22, Division 4.5).

Additionally, project construction activities would be required to implement a SWPPP in accordance with the NPDES Construction General Permit. As discussed in Section 10, Hydrology and Water Quality, the SWPPP and applicable BMPs would be implemented as part of Mitigation Measure HYD-1 to minimize potential impacts from pollutants entering the County's stormwater system. Therefore, with implementation of Mitigation Measure HYD-1, construction of the proposed project would result in a less than significant impact related to the routine transport, use, disposal of, or accidental release of hazardous materials or toxic substances.

Operation

The proposed project involves the redevelopment of a U-Haul Moving and Storage Facility. During operation, the use of hazardous materials would be limited to those commonly found at self-storage facilities such as, solvents, cleaners, paints, and pesticides for landscape maintenance activities. These common household hazardous materials would be used in limited quantities and would not create a substantial hazard to the public or the environment. Therefore, project operation would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through accidental release of hazardous materials and impacts would be less than significant.

Significance Level:

Less than Significant Impact with Mitigation.

Mitigation Measures:

Mitigation HAZ-1: Implement Mitigation HYD-1

Monitoring HAZ-1: Implement Monitoring HYD-1

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Comment:

There are no existing or proposed schools located within 0.25-mile of the project site. The closest schools to the project site are the New Directions School located approximately 0.5-mile west of the project site and Taylor Mountain Elementary School located approximately 0.8-mile northeast of the project site. The proposed project does not involve the development of a use that would emit hazardous materials, substances, or waste during operation. The construction and operation of the proposed project would comply with all applicable federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling and storage of hazardous materials. Therefore, the proposed project would not emit hazardous emissions or waste within 0.25-mile of an existing or proposed school and no impact would occur.

Significance Level:

No Impact.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Comment:

According to the State Water Resources Control Board's (SWRCB's) GeoTracker database, the project site is listed as a Closed Leaking Underground Storage Tank (LUST) site as of December 24, 2024 (SWRCB 2025). The project site formerly operated three underground storage tanks (USTs) with capacities of 550 gallons, 10,000 gallons, and 15,000 gallons. In March 1987, the 550-gallon waste-oil UST was removed from the northern portion of the site. In September 1993, the 10,000-gallon gasoline UST and 15,000-gallon diesel UST were removed from the central portion of the site. The North Coast Regional Water Quality Control Board (RWQCB) issued a No further Action letter for the project site on December 3, 2024, confirming the completion of the site investigation and corrective action for the three underground storage tanks formerly located at the project site. The No Further Action letter also confirmed that the site investigation and corrective action is in compliance with the requirements of subdivisions (a) and (b) of Section 25296.10 of the Health and Safety Code and with corrective action regulations adopted pursuant to Section 25299.3 of the Health and Safety Code and that no further action related to the petroleum release at the site is required (North Coast RWQCB 2024). As such, the proposed project would not be located on a site that would create a significant hazard to the public or the environment and the impact would be less than significant.

Significance Level:

Less than Significant Impact.

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 or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Comment:

The project site is not located within two miles of a public airport and is not located within an airport land use plan. The closest airport to the project site is the Charles M. Schulz Sonoma County Airport, located more than nine miles northwest of the project site and the Petaluma Municipal Airport, located more than 10 miles southeast of the project site. Therefore, the proposed project would not result in a safety hazard or excessive noise related to a nearby airport. No impact would occur.

Significance Level:

No Impact.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Comment:

The proposed project would not result in modifications to the existing roadways that would interfere with or impair implementation of an emergency response plan or evacuation plan. The proposed project would be designed to provide adequate ingress and egress throughout the site to accommodate emergency vehicles and provide connectivity to the existing circulation system. Full roadway closures are not anticipated to be required to accommodate project construction, although one lane on the west side of Santa Rosa Avenue may require closure during utility installation. Any lane closures would require an encroachment permit from Sonoma County, which would require a traffic control plan that identifies all detours and appropriate traffic controls to ensure adequate circulation and emergency access is provided during the construction phase. Therefore, the proposed project would not impair or interfere with the implementation of an emergency response plan or evacuation plan and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Comment:

Based on review of Fire Hazard Severity Zone maps developed by CAL FIRE, the project site is not within or near a State Responsibility Area (SRA) and does not contain lands classified as a Very High Fire Hazard Severity Zone (CAL FIRE 2024). Additionally, the U.S. Forest Service (USFS) Wildfire Hazard Potential database identifies the project site as non-burnable (USFS 2020). All utilities required for the proposed project would be located underground. The proposed project would also be required to comply with the California Fire Code and applicable fire safety standards set forth by the County regarding fire protection. As such, the proposed project would not expose people or structures to risks associated with wildland fires, and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

10. HYDROLOGY AND WATER QUALITY

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Comment:

Construction

The proposed project would disturb the entire 3-acre site. Construction activities would require demolition, grading, foundation work, utility connections, internal roadway construction, building construction, frontage improvements, and landscaping on the project site. It is estimated demolition activities would remove up to 4,000 CY of materials from the site. The total amount of earth movement for the proposed project would require approximately 2,000 CY of cut and approximately 3,000 CY of fill. The maximum depth of excavation is anticipated to be approximately 36 inches bgs.

These activities have the potential to generate stormwater runoff and to discharge pollutants, such as fuel, solvents, oil, paints, and trash. The proposed project would comply with the NPDES General Construction Permit, which requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and the incorporation of BMPs to control sedimentation, erosion, and hazardous materials from contacting stormwater, with the intent of keeping all products of erosion from moving off-site into the adjacent drainage ditches. The SWPPP and applicable BMPs have been incorporated into Mitigation Measure HYD-1 to reduce potential water quality impacts to a less than significant level. Additionally, the proposed project would be required to comply with Chapter 11 and Chapter 11A of the Sonoma County Municipal Code which outlines construction grading and drainage requirements, stormwater quality protection requirements, and requires the implementation of an erosion and sediment plan that conforms with Sonoma County's erosion prevention and sediment control BMP guide. As such, with implementation of Mitigation Measure HYD-1 and compliance with the County's stormwater regulations, construction impacts to water quality would be less than significant.

Operation

Post-construction, the site would be developed with the same type of use as existing conditions. The proposed project would be required to comply with the County's Standard Urban Stormwater Mitigation Plan (SUSMP) which requires applicable projects to design and implement post-development measures to reduce stormwater pollution. The proposed project would construct three bioretention areas that would retain and treat stormwater prior to entering the stormwater system. Inclusion of bioretention areas to treat stormwater runoff from the project site would ensure that polluted runoff does not enter the public stormwater system and would reduce potential impacts related to water quality. As such, operation of the proposed project would not result in the degradation of water quality standards or waste discharge requirements and impacts would be less than significant.

Significance Level:

Less than Significant Impact with Mitigation.

Mitigation Measures:

Mitigation HYD-1: Applicant shall submit a Storm Water Pollution Prevention Plan (SWPPP) in conforming to the requirements of the NPDES General Construction Activity Stormwater Permit, including details on site-specific potential sources of stormwater pollution; pollution prevention measures (erosion and sediment control measures and measures to control non-stormwater discharges and hazardous spills); description of the type and location of erosion and sediment control BMPs to be implemented at the project site; and a BMP monitoring and maintenance schedule to determine the amount of pollutants leaving the project site. A copy of the SWPPP must be current and remain on-site. Water quality BMPs identified in the SWPPP could include but are not limited to the following:

a. Surface water runoff shall be controlled by directing flowing water away from critical areas and by reducing runoff velocity. Diversion structures, such as terraces, dikes, and ditches, shall collect and direct runoff water around vulnerable areas to prepared drainage outlets.
b. Surface roughening, berms, check dams, hay bales, or similar devices shall be used to reduce runoff velocity and erosion.
c. Sediment shall be contained when conditions are too extreme for treatment by surface protection. Temporary sediment traps, filter fabric fences, inlet protectors, vegetative filters and buffers, or settling basins shall be used to detain runoff water long enough for sediment particles to settle out. Construction materials, including topsoil and chemicals, shall be stored, covered, and isolated to prevent runoff losses and contamination of groundwater.
d. Topsoil removed during construction shall be carefully stored and treated as an important resource. Berms shall be placed around topsoil stockpiles to prevent runoff during storm events.
e. Fuel and vehicle maintenance areas shall be established away from all drainage courses, and these areas shall be designed to control runoff.
f. Temporary erosion control measures, such as silt fences, staked straw bales, and temporary revegetation, shall be employed for disturbed areas. No disturbed surfaces will be left without erosion control measures in place during the winter and spring months.
g. A spill prevention and countermeasure plan shall be developed to identify proper storage, collection, and disposal measures for potential pollutants (such as fuel, fertilizers, pesticides, etc.) used on-site. The plan will also require the proper storage, handling, use, and disposal of petroleum products.
h. Construction activities shall be scheduled to reduce land disturbance during peak runoff periods and to the immediate area required for construction. Soil conservation practices shall be completed during the fall or late winter to reduce erosion during spring runoff. Existing vegetation will be retained where possible. To the extent feasible, grading activities shall be limited to the immediate area required for construction.

Monitoring HYD-1: Permit Sonoma Planning shall verify clearance of the SWPPP by the Permit Sonoma Engineering Division, Grading and Stormwater Section prior to issuance of grading permits for the project.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Comment:

The project site is fully developed as a U-Haul Moving and Storage Facility and is not identified as an important groundwater recharge area for the County. Water is currently provided to the site by Sonoma County Water Agency which would continue to provide water to the site post-construction. The Sonoma County Water Agency's water supply is mostly from the Russian River with groundwater from Santa Rosa Plain as a secondary source. As identified in the 2020 Urban Water Management

Plan (UWMP) for Sonoma County Water Agency, Sonoma County Water Agency does not plan to utilize groundwater as a normal year source of supply. Rather, groundwater from the Santa Rosa Plain wells would be utilized on an as-needed basis during periods of drought or when Russian River supplies are otherwise constrained (Sonoma County Water Agency 2021). Therefore, Sonoma County Water Agency does not typically utilize groundwater to serve its customers.

The proposed project would connect to the County's existing public water system within Santa Rosa Avenue. As discussed in Section 19, Utilities and Service Systems, there would be adequate water supplies available to the serve the proposed project. The proposed project would not rely on groundwater supplies or draw groundwater from the site; therefore, it would not substantially deplete groundwater supplies. Additionally, the Geotechnical Study Report encountered groundwater at depths ranging from 11 to 15.5 feet bgs (Appendix C). Construction activities would excavate the project site to a maximum of 36 inches bgs. As such, the proposed project is not expected to encounter groundwater during construction or require dewatering.

Post-construction, the project site would be consistent with existing conditions as most of the site would be covered in impervious surface. The proposed project would create approximately 96,600 square feet of impervious surface and approximately 23,400 square feet of pervious surface consisting of three bioretention areas. Additionally, the proposed project would provide approximately 26,252 square feet of landscaped areas along the perimeter of the site and adjacent to the proposed buildings The bioretention areas and landscaping would provide some opportunity for infiltration for groundwater recharge. Therefore, the proposed project would not substantially decrease groundwater supplies or interfere with local groundwater recharge and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. result in substantial erosion or siltation on- or off-site?

Comment:

The proposed project would not substantially alter the existing drainage pattern of the site or area. However, the proposed project's construction would require excavation and earth moving activities that could expose unprotected soils to stormwater runoff, causing erosion or siltation. Therefore, the proposed project would be subject to existing County regulations related to reducing erosion impacts.

Project construction activities would include site clearing, grading, utility connection, building construction, and landscaping on-site. These activities have the potential to generate stormwater runoff and to discharge pollutants, such as fuels, solvents, oil, paints, and trash, into the County's storm drainage system. However, the proposed project would implement Mitigation Measure HYD-1 and prepare a SWPPP in accordance with the NPDES General Construction Permit. The SWPPP would include BMPs, which would be implemented during construction activities to reduce the potential of erosion. Additionally, the proposed project would be required to comply with Chapter 11 and Chapter 11A of the Sonoma County Municipal Code which outlines construction grading and drainage requirements and stormwater quality protection requirements to prevent erosion related impacts to water quality. The proposed project would be required to prepare and implement an erosion and sediment plan that conforms with Sonoma County's erosion prevention and sediment

control BMP guide. Therefore, with implementation of Mitigation Measure HYD-1 and compliance with County regulations and requirements related to construction site runoff and erosion prevention measures, the proposed project's construction would not result in substantial soil erosion or siltation and impacts would be less than significant.

Post-construction, the project proposes impervious surfacing consistent with existing site conditions with new pervious surfaces landscaped and maintained to prevent erosion. Additionally, the project proposes on-site development of three bioretention areas for treating runoff prior to it discharging into the public stormwater system. The proposed capturing and pre-treatment of runoff further reduces potential erosion and siltation from occurring off-site. Therefore, the operation of the proposed project is not anticipated to result in substantial soil erosion or the loss of topsoil and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Comment:

The project site is fully developed as a U-Haul Moving and Storage Facility. The proposed project would redevelop the site with the same use and create approximately 96,600 square feet of impervious surface and approximately 23,400 square feet of pervious surface consisting of three bioretention areas. As the proposed project would redevelop the site with similar uses and would not substantially increase the amount of on-site impervious surface, the proposed project would not increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site. The proposed project would design and construct the storm drainage improvements in accordance with applicable County requirements and SUSMP to control the volume of surface runoff from the site. As such, impacts would be less than significant.

Significance Level:

Less than Significant Impact.

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

Comment:

As described above, most of the project site is currently paved and redevelopment of the site with the proposed project would not result in substantial changes to the amount of previous and impervious surfaces on-site. Construction and operation of the proposed project would have the potential to generate stormwater runoff and to discharge pollutants, such as fuel, solvents, oil, paints, and trash. Construction activities would conform to the requirements of the NPDES General Construction Permit, which involves the preparation and implementation of a SWPPP. The SWPPP would be implemented as required by Mitigation Measure HYD-1 and specify BMPs to incorporate during construction to prevent, control, and minimize polluted runoff.

During operation, stormwater runoff generated at the project site would be directed toward the three bioretention basins where it would retain and treat on-site runoff prior to being discharged into the public stormwater system. The on-site storm drainage system would be designed and constructed in accordance with County stormwater requirements and SUSMP. Therefore, the proposed project's operation would not create or contribute runoff that would exceed the capacity of the stormwater drainage system or provide substantial additional sources of polluted runoff and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

iv. Impede or redirect flood flows?

Comment:

According to the Federal Emergency Management Agency's Flood Insurance Rate Map No. 06097C0739F, dated July 19, 2022, the project site is located within Zone X (FEMA 2022). Zone X is defined as areas not within either a 100-year or 500-year flood hazard zone. Therefore, the project site would not impede or redirect flood flows. No impact would occur.

Significance Level:

No Impact.

d) **In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

Comment:

Tsunamis typically affect coastlines and areas up to 0.25-mile inland. The project site is more than 20 miles from the coastline and Pacific Ocean and therefore would not be subject to tsunami hazards. A seiche affects locations adjacent to larger water bodies such as lakes or reservoirs. The project site is not located near any such water body. According to the Federal Emergency Management Agency's Flood Insurance Rate Map No. 06097C0739F, dated July 19, 2022, the project site is located within Zone X, an area determined to be outside the 500-year floodplain and defined as 0.2 percent Annual Chance Flood Hazard, Areas of 1 percent annual chance flood with average depth less than one foot or with drainage area of less than one square mile (FEMA 2022). As such, no impact would occur related to inundation by seiche, tsunami, or flood flows.

Significance Level:

No Impact.

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

Comment:

The Sonoma County Water Agency's water supply is mostly from the Russian River with groundwater from Santa Rosa Plain as a secondary source. The proposed project would connect to the County's existing public water system within Santa Rosa Avenue. Therefore, the proposed project would not rely on groundwater supplies or interfere with implementation of a groundwater management plan.

Additionally, the proposed project would be required to comply with the policies and objectives of the Water Quality Control Plan for the North Coast RWQCB. As required by Mitigation Measure HYD-1, the proposed project would obtain coverage under the NPDES General Construction Permit. Compliance with these regulations would require the proposed project to prepare a SWPPP that includes BMPs that meet the requirements of the North Coast RWQCB's Water Quality Control Plan. The implementation of Mitigation Measure HYD-1 would reduce potential impacts to water quality to a less than significant level and therefore would not conflict with or obstruct implementation of the Water Quality Control Plan for the North Coast RWQCB.

Significance Level:

Less than Significant Impact.

11. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

Comment:

The project site is in an urbanized area and currently developed as an existing U-Haul Moving and Storage Facility. The project is proposing to demolish the three existing buildings to construct a new 4,745 square foot retail building and a 116,600 square foot self-storage building. The proposed project would also include a surface parking lot, on- and off-site utility connections, landscaping, and frontage improvements. All vehicles would enter and exit the project site from Santa Rosa Avenue. The proposed project would not result in the permanent modification of existing roadways or the construction of new roadways that could impede circulation through the area. Furthermore, the proposed project would not introduce physical features that could create a barrier, divide, or separate adjacent uses. The proposed project would not physically divide an established community, and no impact would occur.

Significance Level:

No Impact.

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?

Comment:

The project site is in an urbanized portion of the County, between U.S. 101 and Santa Rosa Avenue. The site is developed as a U-Haul Moving and Storage Facility and surrounded by a mix of industrial and commercial uses, such as auto body shops, self-storage facilities, and construction equipment rentals.

The proposed project involves the redevelopment of an existing U-Haul Moving and Storage Facility that consists of a 2,163 square foot retail building, a 5,166 square-foot warehouse building, a 4,099 square-foot self-storage building, and surface parking lot. The project is proposing to demolish the three existing buildings to construct a new 4,745 square-foot retail building and a 116,600 square-foot self-storage building. The proposed project would also include a surface parking lot, on- and off-site utility connections, landscaping, and frontage improvements.

The project site is zoned M1 and is within the VOH Combining District and the SR Combining District. Development of a personal storage facility in the M1 zoning district is an allowed use with the approval of a Use Permit. The new facility would include a 4,745 square foot retail building and a 116,600 square foot self-storage building. The proposed retail building would have a maximum height of 20 feet, and the self-storage building would have a maximum height of 64 feet. The proposed project would also include a surface parking lot with 28 spaces, on- and off-site utility connections, landscaping, and frontage improvements.

The proposed project would be consistent with the existing on-site use and the surrounding land uses. The proposed project would also comply with the development standards for the M1 zoning district, including the maximum height requirements, which allows buildings up to 65 feet tall. As the project site is within the SR Combining District, the proposed project would also be subject to Section 26-64-030 of the Sonoma County Municipal Code which requires a building setback of 20 feet for scenic corridor properties along U.S. 101. The project site is also within the VOH Combining District,

which is intended to protect, preserve, and enhance valley oak woodland habitat. The proposed project does not involve the removal of any trees or valley oak woodland habitat and therefore would not conflict with the requirements of the VOH Combining District.

The proposed project would be subject to design review in accordance with Article 82 of the Sonoma County Municipal Code. Additionally, the proposed project would be subject to the Urban Design Guidelines for the South Santa Rosa Area Plan to ensure the project design is compatible with the surrounding land uses. Therefore, with the approval of a Use Permit and compliance with the County's design review process and the Urban Design Guidelines for the South Santa Rosa Area Plan, the proposed project would not conflict with the City's General Plan or Zoning Code, and the impact would be less than significant.

Significance Level:

Less than Significant Impact.

12. MINERAL RESOURCES

Would the project:

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?

Comment:

The project site is in an urbanized area and developed as a U-Haul Moving and Storage Facility. According to the DOC's Mineral Lands Classification Map of Aggregate Resources, the project site is within an area classified as Mineral Resource Zone(MRZ)-1, which indicates that no significant mineral deposits are present or likely to be present (DOC 1982). No mineral extraction activities exist on or near the site. Furthermore, mineral extraction activities are not permitted in the M1 zoning district or included as part of the proposed project. The proposed project would not 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. No impact would occur.

Significance Level:

No Impact.

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?

Comment:

The project site is within an area classified as MRZ-1, which indicates that no significant mineral deposits are present or likely to be present (DOC 1982). The project site has not been delineated as a locally important mineral resource recovery site by the General Plan, General Plan EIR, or any specific plan or other land use plan. Therefore, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site, and no impact would occur.

Significance Level:

No Impact.

13. NOISE

Would the project:

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?

Comment:

The analysis below is based on the Noise Report prepared by Stantec in May 2024 (Appendix D). As discussed in the Noise Report, the project site. The project site currently operates as a U-Haul Moving and Storage Facility and land uses surrounding the site include a mix of industrial and commercial uses, such as auto body shops, self-storage facilities, and construction equipment rentals. The closest noise-sensitive receptors to the project site are the residential homes in the Westfield Community, approximately 350 feet north.

The existing, or ambient, noise environment in a project area is characterized by the area's general level of development. Areas which are not urbanized are relatively quiet, while areas which are more urbanized are noisier as a result of roadway traffic, industrial activities, and other human activities. The loudest source of noise at the project site is traffic noise from the surrounding roadways, especially U.S. 101. Other sources of noise at the project site include activity from the surrounding commercial uses.

A survey of ambient noise in Sonoma County was conducted for the General Plan. The community noise measurements indicated that typical cumulative noise levels in noise-sensitive areas range from 45 to 55 dB(A) Ldn. The community noise survey results indicated that median (L50) noise level values in most locations are relatively low, especially at night. The relatively low noise levels are typical of small communities and rural areas. In more developed areas, such as around the project site, increased local traffic would result in higher noise levels, in the range of 55 to 65 dB(A) Ldn.

Exterior Traffic Noise

Traffic noise depends primarily on traffic speed (tire noise increases with speed) and the proportion of truck traffic (trucks generate engine, exhaust, and wind noise in addition to tire noise). Changes in traffic volumes can also have an impact on overall traffic noise levels. For example, it takes 25 percent more traffic volume to produce an increase of only 1 dB(A) in the ambient noise level. For roads already heavy with traffic volume, an increase in traffic numbers could even reduce noise because the heavier volumes could slow down the average speed of the vehicles. A doubling of traffic volume results in a 3 dB(A) increase in noise levels.

To describe future noise levels due to traffic added from the proposed project, AM and PM peak hour trips listed in the Transportation Impact Analysis prepared by Stantec (Appendix E) were used to determine the percentage increase of traffic on the local roadways near the project site and the closest noise sensitive receptors. According to the Transportation Impact Analysis prepared by Stantec, the proposed project is anticipated to generate a maximum of 10 additional vehicle trips during the AM peak hour and 16 additional vehicle trips during the PM peak hour.

The California Department of Transportation (Caltrans) Traffic Census Program lists a 2022 peak hour traffic volume of 9,000 vehicles on U.S. 101 at Todd Road near the project site. Adding a maximum of 16 vehicles to the peak hour traffic volume on U.S. 101 results in a less than 1 percent increase in traffic and less than 1 dB(A) increase in noise. Therefore, the proposed project would not cause increased traffic noise levels over the current conditions, and impacts related to exterior traffic noise would be less than significant.

Interior Traffic Noise Level Impacts

CalGreen states if an occupied non-residential space (i.e. offices, occupied commercial space) is exposed to a noise level of 65 dB(A) Leq 1-hour during any hour of operation, the exterior façade design shall incorporate features to reduce noise inside the spaces to a maximum of 50 dB(A) Leq 1-hour. Given the project site may be exposed to noise levels up to 65 dB(A) Ldn, the proposed retail structure would be subject to the CalGreen requirements.

Assuming a worst-case condition of the U-Haul office and showroom spaces being finished with a hard surfaced floor and a hard ceiling, a typical one-inch-thick insulating glass unit constructed of 0.25-inch glass – 0.5-inch airspace – 0.25-inch glass should be acceptable for the spaces to achieve the CalGreen code requirement and interior traffic noise levels would have a less than significant impact.

Fixed-Source Noise

Typical commercial spaces, including climate-controlled storage spaces, would involve new rooftop mechanical equipment, such as condensing units, air handling units, and exhaust fans. This equipment would generate noise that would radiate to the neighboring properties. The noise from this equipment would be required to comply with the requirements listed in Table NE-2 in the Sonoma County General Plan. Thus, when the actual on-site equipment is selected, the equipment would be required to be designed to incorporate measures such as shielding and/or appropriate attenuators to reduce noise levels that may affect nearby properties. In addition, nighttime noise limits would be applicable to any equipment required to operate between the hours of 10:00 p.m. and 7:00 a.m. Therefore, with implementation of County requirements, the impact of fixed-source noise to the neighboring properties would be less than significant.

Operational Noise

Other noises generated from the operation of the proposed project includes elements such as parking lot activity, the opening and closing of storage space doors, rental truck and vehicle traffic, the operation of security gates, and voice communication. The project site currently operates as an existing U-Haul Moving and Storage Facility and presently generates noises as listed above. The proposed project would not create any new noise sources associated with the operation of the facility. Therefore, the impact of operational noise from the proposed project would be less than significant.

Short Term Construction Noise

Construction of the proposed project would include site work, construction of two buildings, and landscaping. Each construction stage would have its own mix of equipment, and consequently, its own noise characteristics. The various construction operations would change the character of the noise generated at the project site and therefore, the noise level as construction progresses. The loudest stages of construction typically involve earthmoving and grading equipment. The construction of the proposed project would be conducted in four stages and each stage would use different construction equipment. The main types of noise-producing equipment for each construction stage are shown in Table 10.

Table 10: Construction Stage Equipment

Construction Stage	Construction Equipment	
Site Work	• Excavators (4) • Dump Trucks (5)	• Skip (Front-End) Loaders (2)
Building Construction A	• Excavator • Dump Truck	• Skid Steer (Dozer) • Skytrak 10052 (Gradall Forklift)
Building Construction B	• Skytrak 10052 (Gradall Forklift) • Dump Truck	• Excavator
Landscaping	• Skid Steer (Dozer)	• Excavator

Table 11 lists the types of construction equipment and the maximum and average operational noise level as measured at 350 feet from the operating equipment. The 350-foot distance represents the approximate distance between the project site and the closest noise-sensitive receptor in the Westfield Community to the north.

Table 11: FHWA Roadway Construction Noise Model Source Noise Levels

Construction Equipment Source at the Project Site	Distance to Nearest Sensitive Receptor, feet	Sound Level at Receptor		
		Lmax, dB(A)	Acoustical Use Factor (%)	Leq, dB(A)
Dump Truck	350	59.5	40	55.6
Excavator	350	63.8	40	59.8
Skid Steer (Dozer)	350	64.8	40	60.8
Skip (Front End) Loader	350	62.2	40	58.2
Skytrak 10052 (Gradall Forklift)	350	66.5	40	62.5

Source: Appendix D

A worst-case condition for construction activity would assume all noise-generating equipment were operating at the same time and at the same distance from the closest noise-sensitive receptor. Using this assumption, the roadway construction noise model program calculated the following combined Leq and Lmax noise levels from each stage of construction as shown in Table 12.

Table 12: Calculated Noise Level from Each Construction Stage

Construction Phase	Distance to Closest Noise Sensitive Receptor, ft	Calculated Lmax, dB(A)	Calculated Leq, dB(A)
Site Work	350	72.4	68.4
Building Construction A	350	70.3	66.3
Building Construction B	350	68.9	64.9
Landscaping	350	67.3	63.3

Source: Appendix D

Neither the Sonoma County Municipal Code nor the Sonoma County General Plan contain noise level restrictions for construction activity. Where limits are not available to assess construction noise impact, the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual offers guidelines in Section 7, Noise and Vibration During Construction. Section 7 in the manual states "*While it is not the purpose of this manual to specify standardized criteria for construction noise impacts, the following guidelines can be considered reasonable criteria for assessment. If these criteria are exceeded, there may be adverse community reaction.*" Table 7-3 in the FTA Transit Noise and Vibration Impact Assessment Manual lists a guideline of 80 dB(A) Leq for construction noise received at residential properties during daytime hours.

All calculated worst-case construction noise levels from the proposed project are below the 80 dB(A) daytime guidelines. In conclusion, construction noise would be short-term and intermittent and calculated construction noise levels at the closest residential receptors would be below the FTA guideline. Therefore, impacts from construction noise would be less than significant.

Significance Level:

Less than Significant Impact.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Comment:

During construction of the proposed project, equipment such as bulldozers and loaded trucks may be used as close as 350 feet from the nearest sensitive receptor in the Westfield Community. Equipment used during project construction could generate vibration levels between 0.0001 Peak Particle Velocity (PPV) and 0.0017 PPV at 350 feet, as shown below in Table 13.

Table 13: Estimated Vibration Levels for Construction Equipment

Type of Equipment	Peak Particle Velocity at 350 Feet	Threshold at which Human Annoyance Could Occur	Potential for Proposed Project to Exceed Threshold
Large Bulldozer	0.0017	0.10	No
Loaded Trucks	0.0015	0.10	No
Small Bulldozer	0.0001	0.10	No

Type of Equipment	Peak Particle Velocity at 350 Feet	Threshold at which Human Annoyance Could Occur	Potential for Proposed Project to Exceed Threshold

Source: Appendix D

All estimated vibration levels would be below the FTA vibration threshold at which human annoyance could occur. Additionally, all estimated vibration levels would be below the California Department of Transportation's threshold for damage to typical residential and commercial structures, which ranges from 0.3 to 0.5 PPV for continuous/frequent sources. Therefore, impacts from construction vibration would be less than significant.

Significance Level:

Less than Significant Impact.

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?

Comment:

The project site is not located within two miles of a public airport and is not located within an airport land use plan. The closest airport to the project site is the Charles M. Schulz Sonoma County Airport, located more than nine miles northwest of the project site and the Petaluma Municipal Airport, located more than 10 miles southeast of the project site. Therefore, the proposed project would not expose people working in the project area to excessive noise levels from airports and there would be no impact.

Significance Level:

No Impact.

14. POPULATION AND HOUSING

Would the project:

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)?**

Comment:

The proposed project involves the redevelopment of an existing U-Haul Moving and Storage Facility with a new 4,745 square foot retail building and a 116,600 square foot self-storage building. The project site is in a developed area and surrounded by a mix of industrial and commercial uses, such as auto body shops, self-storage facilities, and construction equipment rentals. The proposed project would not result in the extension of roads or utility infrastructure into any area that is not already served by existing transportation and utility systems. Furthermore, the proposed project would not involve a residential component that would directly induce population growth. It is anticipated the proposed project would require approximately 13 employees, which would be the 13 employees that work at the current facility. Therefore, the proposed project would not directly or indirectly induce substantial unplanned population growth and there would be no impact.

Significance Level:

No Impact.

b) Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

Comment:

The project site is fully developed and contains multiple buildings associated with the existing U-Haul Moving and Storage Facility. There are no residential dwellings or residences on-site. Therefore, the proposed project would not result in the displacement of people or housing that would necessitate the construction of replacement housing elsewhere. No impact would occur.

Significance Level:

No Impact.

15. PUBLIC SERVICES

Would the project:

a) 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 rations, response times or other performance objectives for any of the public services:

i. Fire protection?

Comment:

The proposed project involves redevelopment of a U-Haul Moving and Storage Facility with a new 4,745 square-foot retail building and a 116,600 square-foot self-storage building. The proposed project would be located within a developed area that is already served by the Sonoma County Fire District. The proposed project does not involve a residential component that would directly increase demand on the Sonoma County Fire District. It is anticipated the project operation would require up to 13 employees, which would be the employees at the existing facility. As the project site is already served by the Sonoma County Fire District and would be served by the same number of employees, the proposed project would not substantially increase demand for fire protection services.

Additionally, the proposed project would be constructed in accordance with the fire protection requirements of the most recent California Fire Code and applicable County standards. Conformance with the requirements of the California Fire Code would minimize risks associated with fire hazards. Therefore, the impact to fire protection services would be less than significant.

Significance Level:

Less than Significant Impact.

ii. Police?

Comment:

As discussed, the proposed project would be located in a developed area that is already served by the County Sheriff's Department. The proposed project does not involve a residential component that would directly increase demand on the County Sheriff's Department. Project operation would require up to 13 employees, which would consist of employees from the existing facility. As the project site is already served by the County Sheriff's Department and would be served by the same number of employees, the proposed project would not substantially impact the County Sheriff's Department response times. The proposed project would include security measures such as installation of 4- to 6-foot-tall chained lined security fencing along the site perimeter and installation of exterior lighting along the site perimeter and throughout the project site to reduce potential security risk at the site. Therefore, the proposed project would not substantially increase the County Sheriff's Department response times to the project site, nor would it require the construction of new or physically altered police facilities. The impact would be less than significant.

Significance Level:

Less than Significant Impact.

iii. Schools?

Comment:

The proposed project involves redevelopment of a U-Haul Moving and Storage Facility with a new 4,745 square-foot retail building and a 116,600 square-foot self-storage building. No residential uses are proposed; therefore, the proposed project would not directly increase the demand on school facilities. It is anticipated employees generated by the proposed project would already reside in or near Sonoma County and would not directly or indirectly increase demand for new or expanded school facilities. As such, the proposed project would have no impact on school facilities.

Significance Level:

No Impact.

iv. Parks?

Comment:

The proposed project would not involve a residential component or introduce a new population that would directly create additional demand on existing or planned park facilities. It is expected employees generated by the proposed project would already reside in or near Sonoma County and therefore would not directly or indirectly increase the use of nearby park facilities. As such, the proposed project would not significantly affect the County's parkland ratios or result in the need for new or expanded park facilities. No impact would occur.

Significance Level:

No Impact.

v. Other public facilities?

Comment:

As discussed, the proposed project would not generate a residential population that would substantially increase the demand for libraries or other public facilities. It is expected employees generated by the proposed project would already reside in or near the County and would not directly or indirectly increase the demand on other public facilities. No impact would occur.

Significance Level:

No Impact.

16. RECREATION

Would the project:

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?

Comment:

The proposed project would not include a residential component that would directly increase the County's population growth. It is anticipated operation of the project would require approximately 13 employees upon buildout. These employees are expected to be the current 13 employees that work at the facility and would already reside in Sonoma County. Therefore, due to the limited number of on-site employees, the proposed project would not be expected to directly or indirectly increase the use of any existing recreation facilities or result in the need for new or expanded recreation facilities. No impact would occur.

Significance Level:

No Impact.

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?

Comment:

The proposed project involves the redevelopment of an existing U-Haul Moving and Storage Facility with a new 4,745 square foot retail building and a 116,600 square foot self-storage building. The scope of the proposed project would not include the construction or expansion of recreational facilities. Therefore, the proposed project would not result in an adverse physical effect on the environment related to the construction or expansion of recreation facilities. No impact would occur.

Significance Level:

No Impact.

17. TRANSPORTATION

Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

Comment:

The Circulation and Transit Element of the Sonoma County General Plan consists of the general location and extent of existing and proposed transportation routes and facilities that corelate with the land use element of the General Plan and includes goals, objectives, and policies affecting the mobility of future residents, businesses, and visitors. The proposed project does not propose to amend or adjust roadway classifications, the roadway network, transit routes, or bicycle network as identified in the General Plan. Therefore, the proposed project would not conflict with the County's General Plan Circulation and Transit Element, or any program, plan, ordinance, or policy addressing the circulation system and there would be no impact.

Significance Level:

No Impact.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Comment:

The following analysis is based on the Transportation Impact Analysis prepared by Stantec for the proposed project in May 2024 (Appendix E). As part of the Transportation Impact Analysis, a vehicle miles traveled (VMT) assessment was prepared in compliance with the CEQA Guidelines and the requirements of SB 743.

SB 743 required the Governor's Office of Planning and Research (OPR) to establish recommendations for identifying and mitigating transportation impacts within CEQA. In response, OPR prepared a document referred to in this analysis as OPR's Technical Advisory. OPR's Technical Advisory recommends methodologies for quantifying VMT, significance thresholds for identifying a transportation impact, and screening criteria to quickly identify if a proposed project can be presumed to have a less than significant impact. Lead agencies can adopt local guidelines appropriate for their jurisdiction. Sonoma County has traffic study guidelines from prior to when VMT guidelines were established, which do not include VMT guidelines. Therefore, this analysis follows OPR's Technical Advisory recommendations for VMT analysis.

Prior to undertaking a detailed VMT analysis, OPR's Technical Advisory advises that lead agencies conduct a screening process "to quickly identify when a project should be expected to cause a less than significant impact without conducting a detailed study." Lead agencies may screen out VMT impacts using project size, maps depicting areas of low VMT, transit availability and provision of affordable housing. The proposed project's screening criteria and threshold are summarized in Table 14.

Table 14: Project Screening Criteria and Threshold

Category	Criteria/Screening	Threshold	Does Project Meet Screening Criteria?
Project Size Screening	Small projects can be screened out from completing a full VMT analysis.	If the project generates less than 110 trips per day, the Project is assumed to have a less than significant impact.	No
Map-based Screening	Projects that are located in areas with low VMT can be screened out from completing a full VMT analysis.	If the project is in a low VMT area, the Project is assumed to have a less than significant impact.	No
Transit Proximity Screening	Projects within 0.5 mile of a major transit stop or a stop located along a high-quality transit corridor reduce VMT and therefore can be screened out from completing a full VMT analysis.	If the project is within 0.5 mile of a major or high-quality transit stop/corridor, the project is assumed to have a less than significant impact.	No
Affordable Housing Screening	Affordable housing in infill locations can be screened out from completing a full VMT analysis.	If the project is comprised 100 percent of affordable units and is located in an infill location, then the project is assumed to have a less than significant impact.	No

As shown in Table 14 and discussed below, the proposed project does not meet any of the screening criteria and therefore, a detailed VMT analysis is required.

Project Size Screening: As shown in Table 15 below, the proposed project would generate approximately 176 daily trips. Taking credit for the trips from the existing storage facility, the project would generate approximately 160 net new daily trips. Since the project is estimated to generate more than 110 daily trips, the small project screening criteria is not met.

Table 15: Trip Generation Summary

Scenario	Units	Amount	AM Peak Hour			PM Peak Hour			ADT
			In	Out	Total	In	Out	Total	
Trip Rates									
Mini-Warehouse (151)	TSF	-	0.05	0.04	0.09	0.07	0.08	0.15	1.45
Project Trip Generation									
U-Haul Self Storage (Existing)	TSF	11.428	0	0	0	0	0	2	16
U-Haul Self Storage (Proposed)	TSF	121.345	6	4	10	9	9	18	176
Net New Trips			**6**	**4**	**10**	**9**	**9**	**16**	**160**

Map-based Screening: A project can be presumed to have a less than significant impact if the project is located within a low VMT generating area and the project land uses are generally consistent with the built uses. The proposed project is not in a low VMT generating area according to the County's VMT screening maps. Therefore, the proposed project does not meet the map-based screening criteria.

Transit Proximity Screening: A project can be screened out as having a less than significant impact on VMT if the project is within 0.5 mile of a major or high-quality transit stop/corridor. The proposed project is not in a Transit Priority area according to the County's VMT screening maps. Therefore, the proposed project does not meet the criteria.

Affordable Housing Screening: The proposed project is not an affordable housing project. Therefore, the affordable housing screening criteria is not applicable.

OPR's VMT guidelines include significance thresholds that define a significant transportation impact for typical residential, office, and retail projects. However, the guidelines do not specifically address unique uses such as the proposed self-storage project. Significance thresholds for such projects may be determined on a case-by-case basis. Therefore, for this analysis the proposed project has been evaluated based on a detailed assessment of the unique characteristics of this specific type of use.

The proposed project provides a community-focused use; hence it can be considered locally serving since the demand for self-storage facilities is generally constant and independent of the actual number of self-storage facilities that are provided in an area. There are currently 19 other self-storage facilities along Santa Rosa Avenue within a 3-mile radius of the proposed project.

The development of a new self-storage facility in an area of existing self-storage facilities would have the effect of redistributing existing self-storage trips within the surrounding area rather than creating new trips. These trips would be redistributed based on a location that is most convenient for the customer, i.e., based on availability, lowest price, or the closest location. Providing additional self-storage facilities in the area will also reduce the need for City/County residents to travel to other locations further removed, such as Petaluma or Sonoma. Assuming that storage facilities are generally available, and cost is generally similar, customers would not be expected to drive any farther than necessary. Thus, the proposed project's location would reduce the amount of travel required for customers living in the proposed project's vicinity and would result in a net reduction in VMT associated with this type of use. Additionally, as the project site is already currently developed with a self-storage facility, redevelopment of the site with the same uses would not result in increases in vehicle trips in the area. Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and would have a less than significant VMT impact.

Significance Level:

Less than Significant Impact.

c) Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Comment:

During construction, the proposed project would generate traffic through the transport of workers, equipment, and materials to and from the project site. The use of roadways by heavy construction equipment can increase the risk to drivers and cyclists in the vicinity of the project site; however, construction activities would generally occur within the project site. Construction activities may extend into Santa Rosa Avenue to connect to existing utilities. Any construction traffic, lane closures, or street staging would require an encroachment permit from Sonoma County. Approval of an encroachment permit would require a traffic control plan, which would identify all detours and appropriate traffic controls. Therefore, project construction would not create a transportation hazard, and the impact would be less than significant.

Operation of the proposed project would not result in changes to the existing roadway system that

would create road hazards. The proposed project would provide two access points by using the existing northern driveway and relocating the main driveway to the southern end of the site. The two driveways would be widened to 40 feet and connect to an internal drive lane of approximately 24 feet that extends along the southern boundary of the site and terminates at a turnaround to accommodate heavy trucks and/or fire engines. The County and Sonoma County Fire District would review all site plans to ensure the proposed project would provide clear sight lines, adequate access for emergency vehicles, and pedestrian safety features. Therefore, operation of the proposed project would not substantially increase hazards due to a design feature, and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

d) Result in inadequate emergency access?

Comment:

The proposed project would not result in modifications to existing roadways that would result in inadequate emergency access. The proposed project would be designed to provide adequate ingress and egress throughout the site to accommodate emergency vehicles and provide connectivity to the existing circulation system. Full roadway closures are not anticipated to be required to accommodate project construction, although one lane on the west side of Santa Rosa Avenue may require closure during utility installation. Any lane closures would require an encroachment permit from Sonoma County, which would require a traffic control plan that identifies all detours and appropriate traffic controls to ensure adequate circulation and emergency access is provided during the construction phase. Therefore, the proposed project would not result in inadequate emergency access during construction or operation and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

18. TRIBAL CULTURAL RESOURCES

Would the project:

a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

   i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

   ii) A resource determined by the lead agency. In its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

   Comment:

   Pursuant to Assembly Bill (AB) 52, lead agencies are required to conduct formal consultations with California Native American tribes during the CEQA process to identify tribal cultural resources that may be subject to significant impacts by a project. Where a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact. This consultation requirement applies only if the tribes have sent written requests for notification of projects to the lead agency.

   On April 18, 2024, Permit Sonoma circulated its agency referral packet providing opportunity for comments concerning project to selected relevant local, state and federal agencies, special interest groups anticipated to take interest in the project, and to local tribes for consultation purposes. On April 23, 2024, Brenda L. Tomaras of Tomaras & Ogas, LLP, on behalf of the Lytton Rancheria Tribe, and Anthony Macias, Tribal Historic Preservation Officer for the Kashia Band of Pomo Indians, each confirmed the tribes were not requesting consultation.

   No known tribal cultural resources were identified in the project site or within 0.25-mile of it during the archival records search and literature review performed as part of the Cultural Resources Technical Memorandum prepared by Stantec in April 2024. Additionally, a search of the NAHC SLF did not indicate the presence of tribal cultural resources in the project site. As discussed in Section 5, Cultural Resources, the project site is located relatively far from a freshwater source or any other significant landscape features (which are often associated with pre-contact habitation sites) and has been subject to ground disturbance, indicating the risk for encountering buried pre-contact era deposits at the site is low. Therefore, the proposed project is not anticipated to impact tribal cultural resources, and the impact would be less than significant.

   Significance Level:

   Less than Significant Impact.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

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?

Comment:

The project site is already served by existing water, wastewater, stormwater, and electricity services in the area. As discussed below, the proposed project would include utility connections in accordance with the requirements of the applicable utility providers.

Water

Water is provided to the project site by Sonoma County Water Agency. The existing on-site water supply would be redirected to the proposed buildings via a new 4-inch water line, ultimately connecting to the 12-inch water main in Santa Rosa Avenue. As discussed in Impact UTIL-b, the proposed project would redevelop the site with a use similar to existing conditions and would not substantially increase the water demand at the site. Furthermore, the proposed project is consistent with the General Industrial land use designation as contemplated in the County's 2020 UWMP and General Plan. The County's 2020 UWMP identified that during a single dry year scenario starting in 2030, water demands would exceed water supplies. However, Sonoma County Water Agency would work with its customers to reduce demand, utilize local supplies, and implement the Sonoma County Water Agency's Water Shortage Contingency Plan (WSCP) to respond to a water shortage. Otherwise, the 2020 UWMP determined that there would be sufficient water supplies available during normal and multiple dry year scenarios to meet demand through 2045 (Sonoma County Water Agency 2021). As the proposed project would develop the site with a use similar to existing conditions and is consistent with the General Industrial land use designation as contemplated in the County's 2020 UWMP and General Plan, the project water demand would be adequately served by the County's existing infrastructure. Therefore, the proposed project would not require the construction of new water treatment facilities or expansion of existing facilities, and impacts would be less than significant.

Wastewater Treatment

The proposed project would be served by the South Park County Sanitation District, which is managed by Sonoma County Water Agency. As part of the project, the existing on-site sewer lines would be redirected to the proposed buildings via new sewer lines, ultimately connecting to the 8-inch sewer main in Santa Rosa Avenue. The proposed project would redevelop the site with a use similar to existing conditions and would not substantially increase the amount of wastewater generated at the site. The proposed project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Therefore, impacts to wastewater treatment facilities would be less than significant.

Stormwater Drainage

Stormwater service would be provided by Sonoma County's existing stormwater system. The proposed project would create approximately 96,600 square feet of impervious surface and approximately 23,400 square feet of pervious surface consisting of three bioretention areas. The bioretention facilities provided on-site would reduce the rate of runoff to ensure that the existing stormwater system is not overloaded and the existing infrastructure in the area would be adequate to

serve the proposed project. As such, impacts related to the construction of the on-site stormwater facilities would be less than significant.

Other Utilities

PG&E provides electricity and natural gas service to the project site. A PG&E pad mounted utility transformer and main switchboard is currently located along the northern site boundary. Electricity would be extended from the main switchboard to the two new buildings. The proposed project would include energy conservation features to meet the state's Title 24 Energy Efficiency standards, such as installing LED lighting and EV charging stations. The project utility connections would be designed and constructed in accordance with the County's engineering standards and PG&E requirements. Therefore, impacts would be less than significant.

Significance Level:

Less than Significant Impact.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Comment:

The proposed project would redevelop the site with a use similar to existing conditions and would not substantially increase the water demand at the site. The proposed project is consistent with the General Industrial land use designation as contemplated in the County's 2020 UWMP and General Plan. The County's 2020 UWMP identified that during a single dry year scenario starting in 2030, water demands would exceed water supplies. However, Sonoma County Water Agency would work with its customers to reduce demand, utilize local supplies, and implement the Sonoma County Water Agency's WSCP to respond to a water shortage. Otherwise, the 2020 UWMP determined that there would be sufficient water supplies available during normal and multiple dry year scenarios to meet demand through 2045 (Sonoma County Water Agency 2021).

As the proposed project would develop the site with a use similar to existing conditions and is consistent with the General Industrial land use designation as contemplated in the County's 2020 UWMP and General Plan, there would be sufficient water supplies available to serve the proposed project and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Comment:

As discussed, the proposed project would be served by the South Park County Sanitation District, which is managed by Sonoma County Water Agency. As part of the project, the existing on-site sewer lines would be redirected to the proposed buildings via new sewer lines, ultimately connecting to the 8-inch sewer main in Santa Rosa Avenue. The proposed project would redevelop the site with a use similar to existing conditions and would not substantially increase the amount of wastewater generated at the site. Therefore, it is anticipated the South Park County Sanitation District would have adequate capacity to serve the proposed project's wastewater demands and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

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?

Comment:

Central Disposal Site, located in Petaluma, is the only active landfill located within the County. Therefore, solid waste generated at the project site would be anticipated to be disposed of at the Central Disposal Site. The Central Disposal Site has a maximum daily permitted throughput of 2,500 tons per day and has a remaining capacity of 8,310,149 cubic yards. The Central Disposal Site is anticipated to cease operation in 2040 (CalRecycle 2025).

The proposed project is not anticipated to generate significant amounts of solid waste. Additionally, as the project site would be redeveloped with similar uses to what currently exists on-site, the proposed project is not anticipated to increase the volume of solid waste generated at the site from current conditions. Operation of the proposed project would require approximately 13 employees which are expected to be the current 13 employees that work at the existing facility.

In 2023, the Sonoma County Waste Management Agency was identified to have a calculated disposal rate of 10.4 pounds per person per day for employees (CalRecycle 2023). Therefore, the proposed project's 13 employees would be anticipated to generate approximately 135.2 pounds of waste per day or 0.07 tons per day. This would represent less than 0.01 percent of the total maximum daily permitted throughput at the Centra Disposal Site. As the local landfill has sufficient capacity remaining within its landfill, the local infrastructure would be anticipated to be able to continue to adequately handle the volume of solid waste generated at the project site. Additionally, the proposed project would be required to comply with state and County regulations related to solid waste reduction including the Sonoma County Countywide Integrated Waste Management Plan which sets forth solid waste planning strategies. Therefore, the proposed project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and the impact would be less than significant.

Significance Level:

Less than Significant Impact.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Comment:

The proposed project would be required to comply with applicable federal, State, and local management and reduction statues related to solid waste, including the Sonoma County Countywide Integrated Waste Management Plan which sets forth solid waste planning strategies. Therefore, the proposed project would not conflict with federal, State, or local statutes or regulations related to solid waste. Impacts would be less than significant.

Significance Level:

Less than Significant Impact.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Comment:

The project site and the surrounding area are not located within a CAL FIRE designated SRA or a Very High Fire Hazard Severity Zone (CAL FIRE 2024). Additionally, the USFS Wildfire Hazard Potential database identifies the project site as non-burnable (USFS 2020). The proposed project would be designed and constructed to applicable building codes and standards related to fire protection and reduction measures including installation of fire alarms and sprinkler systems. The proposed project does not propose any improvements along the existing roadways that would alter the roadway or impair emergency evacuation of the area. The proposed project is not located in or near an SRA or a Very High Fire Hazard Severity Zone and would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, there would be no impact.

Significance Level:

No Impact.

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?

Comment:

The project site is not located within an SRA and does not contain lands classified as being within a Very High Fire Hazard Severity Zone (CAL FIRE 2024). The project site is in an urban area surrounded by existing development and roadways. The site topography and surrounding area are nearly flat and designated as non-burnable (USFS 2020). Given the characteristics of the project site, the proposed project would not exacerbate fire risk beyond what currently exists in the vicinity of the project site. Development of the proposed project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire, and there would be no impact.

Significance Level:

No Impact.

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 of that may result in temporary or ongoing impacts to the environment?

Comment:

The project site is not within an SRA and does not contain lands classified as being within a Very High Fire Hazard Severity Zone (CAL FIRE 2024). The proposed project involves the redevelopment of an existing U-Haul Moving and Storage Facility with a new 4,745 square foot retail building and a 116,600 square foot self-storage building. All utilities associated with the proposed project would be located underground and would connect to existing infrastructure located within or adjacent to the project site. The proposed project would be required to comply with all applicable building and safety codes, including the California Fire Code, and all applicable fire safety standards set forth by the

County to protect the proposed structures from possible wildfires. Therefore, the proposed project would not require the installation or maintenance of associated infrastructure that would exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The impact would be less than significant.

Significance Level:

No Impact.

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?

Comment:

The project site is not located within an SRA and does not contain lands classified as being within a Very High Fire Hazard Severity Zone (CAL FIRE 2024). The project site and surrounding areas are relatively flat and not in an area subject to landslides or flooding. As such, the proposed project would not 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. No impact would occur.

Significance Level:

No Impact.

21. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Comment:

As discussed in Section 4, Biological Resources, the project site is entirely paved and does not provide suitable habitat for special-status species. Additionally, as discussed in Section 5, Cultural Resources, the potential for project construction to encounter undiscovered cultural resources is low as the project site has been previously excavated, graded, and developed. Therefore, the proposed project would not 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; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory. No impact would occur.

Significance Level:

No Impact.

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)?

Comment:

As described in the impact analysis in Sections 1 through 20 of this Initial Study, any potentially significant impacts of the proposed project would be reduced to a less than significant level following incorporation of the mitigation measures listed herein. Projects completed in the past have also implemented mitigation as necessary. Future projects would similarly be required to mitigate potential impacts. Accordingly, the proposed project would not otherwise combine with impacts of related development to add considerably to any cumulative impacts in the region, and impacts would be considered less than significant.

Significance Level:

Less than Significant Impact.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Comment:

The proposed project would not directly or indirectly cause substantial adverse effects on human beings. Air quality, greenhouse gases, hazardous materials, and/or noise are resources that could cause potential effects through which the proposed project could have a substantial effect on human beings. However, all potential effects of the proposed project related to air quality, geological, greenhouse gases, hazardous materials, and noise are identified as less than significant or less than significant with the implementation of mitigation. All other resource areas would either have no

impact, less than significant impact, or less than significant impact with mitigation incorporated. Therefore, the proposed project would not have environmental impacts which would cause substantial adverse impacts on human beings.

Significance Level:

Less than Significant Impact with Mitigation.

Mitigation:

Implement Mitigations AIR-1, GEO-1, HYD-1