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:	11/10/25
Public Review Period:	11/10/25- 12/10/25
State Clearinghouse Number:	
Permit Sonoma File Number**:**	**PLP25-0005**
Prepared by:	Jennifer Faso
Phone:	(707) 565-1683

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 Name: Aviation Boulevard Minor Subdivision and Design Review

Project Applicant/Operator: Airport Business Center/ Patrick Imbimbo

Project Location/Address: 1729 Airport Blvd, Santa Rosa

APN: 059-271-006

General Plan Land Use Designation: LI (Limited Industrial)

Zoning Designation: MP (Industrial Park District), 1 AC AVG (Average 1 acre density), VOH (Valley Oak Habitat Combining District) `

Decision Making Body: Sonoma County Zoning Administrator

Appeal Body: Planning Commission

Project Description: See Item III, below

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation" as indicated in the attached Initial Study and in the summary table below.

Table 1. Summary of Topic Areas

Topic Area	Abbreviation	**Yes**	**No**
Aesthetics	VIS		X
Agriculture & Forestry Resources	AG		X
Air Quality	AIR	X	
Biological Resources	BIO	X	
Cultural Resources	CUL		X
Energy	ENERGY		X
Geology and Soils	GEO	X	
Greenhouse Gas Emission	GHG		X
Hazards and Hazardous Materials	HAZ		X
Hydrology and Water Quality	HYDRO		X
Land Use and Planning	LU		X
Mineral Resources	MIN		X
Noise	NOISE		X
Population and Housing	POP		X
Public Services	PS		X
Recreation	REC		X
Transportation	TRANS		X
Tribal Cultural Resources	TCR		X
Utilities and Service Systems	UTL		X
Wildfire	FIRE		X
Mandatory Findings of Significance	MFS		X

RESPONSIBLE AND TRUSTEE AGENCIES

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

Table 2.**Agency**	**Activity**	**Authorization**
Bay Area Air Quality Management District (BAAQMD)	Dust Generation during Construction	BAAQMD CEQA Air Quality Guidelines
State Water Resources Control Board	Generating stormwater (Construction, industrial, or municipal)	National Pollutant Discharge Elimination System (NPDES) requires submittal of Notice of Intent (NOI)
Regional Water Quality Control Board (North Coast)	Discharge or potential discharge to waters of the state	California Clean Water Act (Porter Cologne) – Waste Discharge requirements, general permit or waiver

California Department of Fish and Wildlife (CDFW)	Impacts to natural resources, ground disturbance, vegetation removal, etc.	Protection of natural resources held in trust for the people of California; CA Fish & Game Code § 1802 (2024)

ENVIRONMENTAL FINDING:

Based on the evaluation in the attached Expanded Initial Study, I find that the project described above will not have a significant adverse impact on the environment, provided that 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 identified mitigation measures into the project plans.

Jennifer Faso

Prepared by: Jennifer Faso, Project Planner 11/10/25

Expanded Initial Study

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

I. INTRODUCTION:

Airport Business Center proposes to subdivide a 5.57-acre parcel into two separate parcels. The resulting parcels will be 3.51-acre parcel (Lot 1) which will be developed with a 21,345 square foot warehouse and offices for Frito Lay and one 1.45-acre parcel (Lot 2) to be developed with a speculative 25,726 square foot warehouse. The project also includes request for Design Review approval for both proposed warehouses. The project site is located at 1729 Airport Boulevard, Santa Roa APN 056-271-006, Supervisorial District 4.

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). The report was prepared by Jennifer Faso, Project Review Planner with the Sonoma County Permit and Resource Management Department, Project Review Division. Information on the project was provided by the project applicant. Technical studies were provided by qualified consultants to support the conclusions in this Expanded 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) Records Section.

Please contact Jennifer Faso, Planner, at (707) 565-1683 or Jennifer.Faso@sonomaocunty.gov for more information.

II. PROJECT DESCRIPTION

The proposed project is a two-lot subdivision with a request for Design Review for two new warehouses. One new warehouse will be construction on each of the newly created lots. The project is located at 1729 Airport Boulevard, Santa Rosa within the Airport Business Park (See Figure 1, Project Location Map).

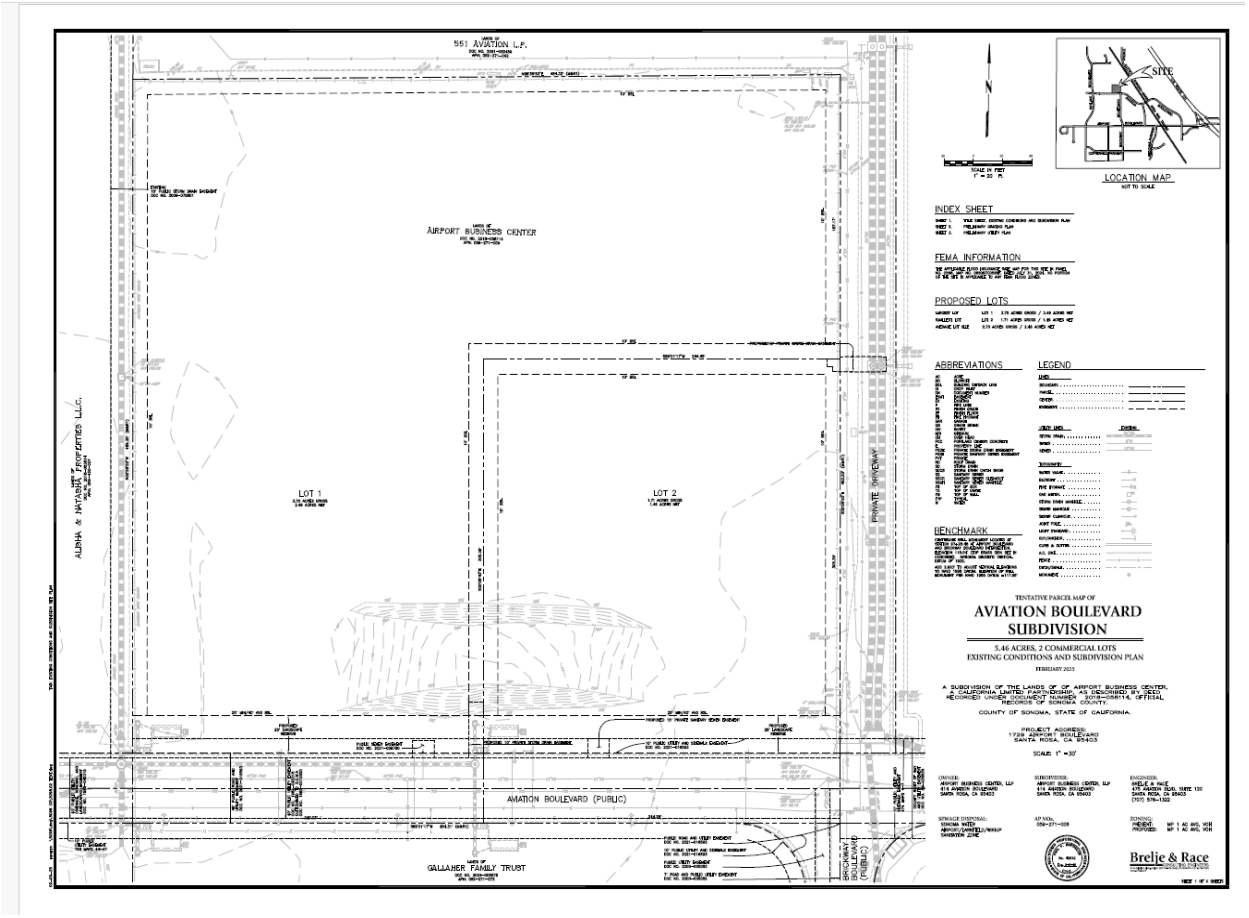
The existing 5.57-acre parcel would be subdivided into two lots. Lot 1 would result in a 3.51-acre lot and would be developed with a 21,345 square foot warehouse with offices to house the Frito Lay Company distribution center. Lot 2 would result in a 1.45-acre parcel that would be developed with a 25,726 square foot warehouse. The Frito Lay warehouse would include 28 parking spaces for employees, including 2 accessible spaces and 10 carpool/electric vehicle charging stations. In addition, 13 depressed loading docks and 37 spaces for route delivery trucks/vans would be provided. The 25,726-sq-ft future tenant warehouse would include 14 parking spaces for employees, including 1 accessible space and 4 carpool/electric vehicle charging stations. In addition, 2 depressed loading docks would be provided.

Landscaping is proposed for both warehouses sites and will include native shrubs and trees. The site landscape and hardscape will be maintained, swept clean and with landscape leaves and debris removed on a regular schedule over the course of the year.

The proposed two-lot subdivision is shown below and in Appendix A.



Figure 1- Project Location Map



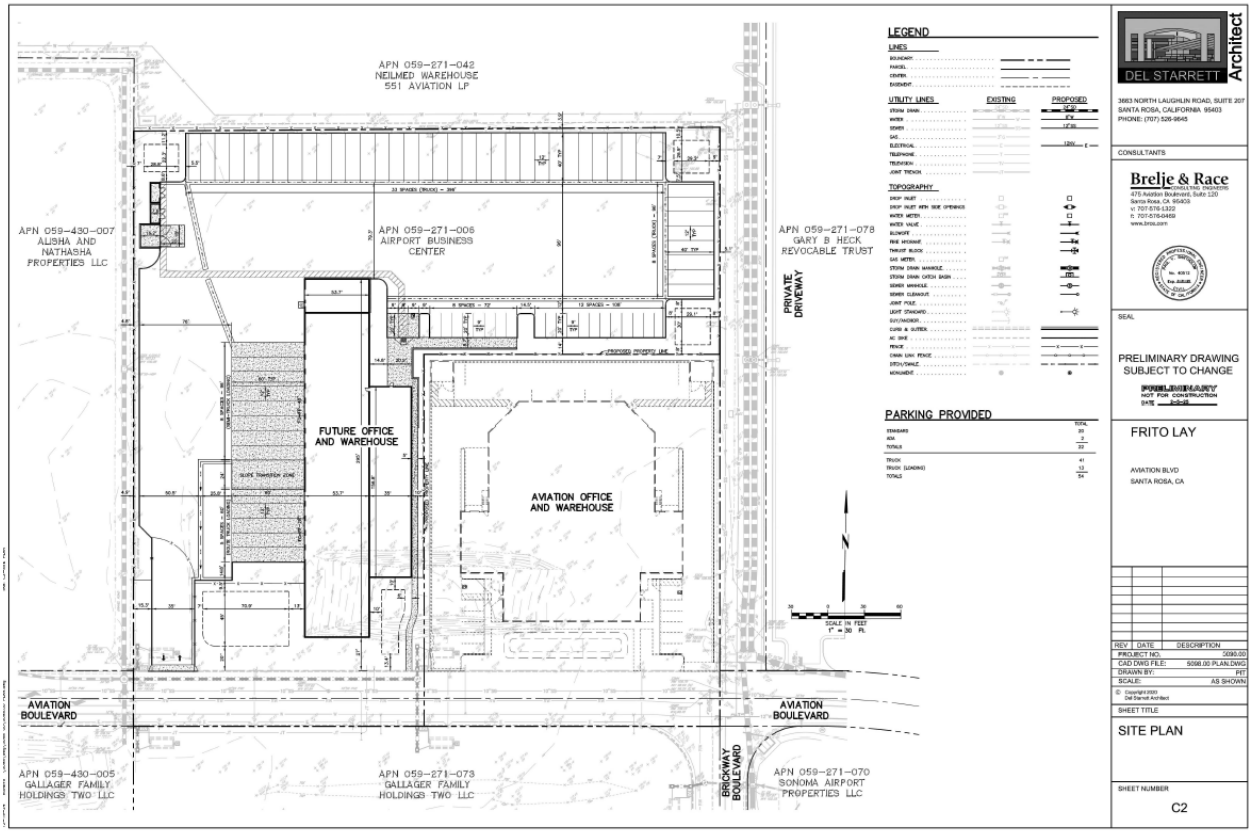
Proposed Tentative Map

The parcel is zoned MP 1 AC AVG (Industrial Park District), VOH (Valley Oak Habitat). The project site is a flat, vacant lot within the Airport Business Center. Access proposed for lots would be from driveways off of Aviation Boulevard.

Water would be provided by the Town of Windsor Water District and Public Sanitary sewer will be provided by the Sonoma County Airport Sanitation District.

The warehouses are proposed to be precast concrete panels or insulated metal building panels for the exterior walls. The buildings would be Tex-coated and window frames would be aluminum with dual glazed high energy efficiency glazing. All exterior lighting fixtures will have sharp cut offs to protect adjacent property from glare and conform with Dark Sky requirements. General site lighting at employee parking and site circulation is proposed to be on daily from sunset to sunrise. Additional security lighting would be motion sensor-activated to come on only when needed.

Below is the site plan (and in Appendix 1) that shows the two with the proposed warehouses and the proposed elevations for each warehouse.


APN 059-271-042
NEILMED WAREHOUSE
551 AVIATION LP
APN 059-430-007
ALISHA AND
NATHASHA
PROPERTIES LLC
APN 059-271-006
AIRPORT BUSINESS
CENTER
APN 059-271-078
GARY B HECK
REVOCABLE TRUST
PRIVATE
DRIVEWAY
FUTURE OFFICE
AND WAREHOUSE
AVIATION OFFICE
AND WAREHOUSE
AVIATION
BOULEVARD
AVIATION
BOULEVARD
BRICKWAY
BOULEVARD
APN 059-430-005
GALLAGER FAMILY
HOLDINGS TWO LLC
APN 059-271-073
GALLAGER FAMILY
HOLDINGS TWO LLC
APN 059-271-070
SONOMA AIRPORT
PROPERTIES LLC
LEGEND
LINES
UTILITY LINES
EXISTING
PROPOSED
TOPOGRAPHY
PARKING PROVIDED
SCALE IN FEET
1" = 30' FL
DEL STARRETT
Architect
3683 NORTH LAUGHLIN ROAD, SUITE 207
SANTA ROSA, CALIFORNIA 95403
PHONE: (707) 526-9545
CONSULTANTS
Brelje & Race
CONSULTING ENGINEERS
475 Aviation Boulevard, Suite 120
Santa Rosa, CA 95403
v: 707-576-1322
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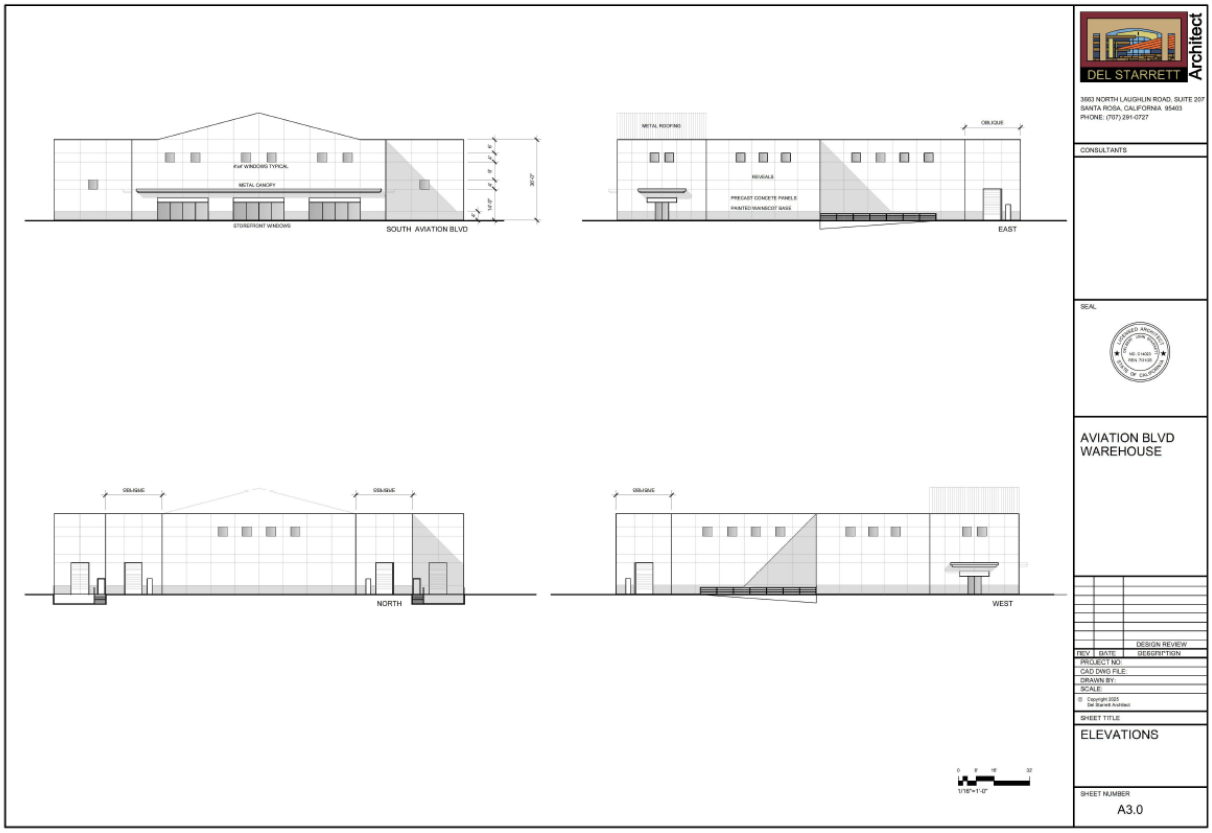
www.brele.com
SEAL
PRELIMINARY DRAWING
SUBJECT TO CHANGE
PRELIMINARY
NOT FOR CONSTRUCTION
DATE
FRITO LAY
AVIATION BLVD
SANTA ROSA, CA
REV | DATE | DESCRIPTION
PROJECT NO.: 0090.00
CAD DWG FILE: 90980.00 PLAN.DWG
DRAWN BY: PIT
SCALE: AS SHOWN
SHEET TITLE
SITE PLAN
SHEET NUMBER
C2



III. SETTING

The site is currently vacant and relatively flat except for a dirt stockpile. Site vegetation consists primarily of native grasses and no trees. The property site is surrounded by existing industrial uses. The site has frontage on Aviation Boulevard.

IV. ISSUES RAISED BY THE PUBLIC OR AGENCIES

On March 5, 2025, a referral packet was drafted and circulated to inform and solicit comments from selected relevant local, state and federal agencies; local tribes; neighbors within 1,000 feet of the project site and to special interest groups that were anticipated to take interest in the project.

Comments were received from:

- Permit Sonoma Fire Prevention
- Permit Sonoma Grading and Stormwater Division
- Sonoma County Public Infrastructure

Referral agency comments included standard conditions of approval for the project.

Assembly Bill 52 Project Notifications were sent to the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Torres Martinez Desert Cahuilla Indians, Mishewal Wappo Tribe of Alexander Valley, Middletown Rancheria Band of Pomo Indians, Lytton Rancheria of California, Kashia

Pomos Stewarts Point Rancheria, and Federated Indians of Graton Rancheria. No Tribe requested formal consultation on the proposed project.

V. 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 project 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. M

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 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.

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:

The proposed project site is located within an unincorporated industrial area of Sonoma County. The existing vacant 5.57-acre lot is surrounded by other industrial uses. The project site is not located with a visually sensitive area identified by the Sonoma County General Plan and is not within a Scenic Resources Combining zoning district.

Significance Level:
No Impact

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

Comment:

The proposed project site is not located along a designated State Scenic Highway. The project site is vacant and does not contain any trees, rock outcropping or historic buildings.

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 vacant parcel within a developed industrial park. The Design Review Committee reviewed the proposed two new warehouses to ensure that they would be compatible with the surrounding business park and provided a recommendation to the Zoning Administrator to approve the proposed warehouses and granted final Design review to staff. The proposed warehouse use is an allowed use within Industrial Park(MP) zoning district. The project site is not located with a Scenic Resource Zoning District.

Significance Level:
No 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 will result in new structures on a vacant lot. New sources of light would include building lighting, security and safety lighting. Thus, the project would introduce new sources of light and glare.

The Sonoma County General Plan Open Space & Resource Conservation Element includes the following goal, objectives, and policies with regard to outdoor lighting:

GOAL OSRC-4: Preserve and maintain views of the night time skies visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location.

Objective OSRC-4.1: Maintain nighttime lighting levels at the minimum necessary to provide for security and safety of the use and users to preserve nighttime skies and the night time character of urban, rural and natural areas.

Objective OSRC-4.2: Ensure that nighttime lighting levels for new development are designed to minimize light spillage offsite or upward into the sky.

Policy OSRC-4a: Require that all new development projects, County projects, and signage utilize light fixtures that shield the light source so that light is cast downward and that are no more than the minimum height and power necessary to adequately light the proposed use.

Policy OSRC-4b: Prohibit continuous all night exterior lighting in rural areas, unless it is demonstrated to the decision-making body that such lighting is necessary for security or operational purposes or that it is necessary for agricultural production or processing on a seasonal basis. Where lighting is necessary for the above purposes, minimize glare onto adjacent properties and into the night sky.

Policy OSRC-4c: Discourage light levels that are in excess of industry and State standards.

The project would be consistent with the General Plan and would not result in the creation of substantial light or glare that would adversely affect day or nighttime views in the area. Under Article 82 of the Zoning Code, the County's standard development regulations call for minimizing the impact of new development by ensuring exterior lighting is designed to prevent glare and preclude light spillage onto neighboring properties and into the night sky.

The project was reviewed by the Design Review Committee and the Design Review Committee found the project consistent with the General Plan and Zoning Code lighting standards. The following standard condition of approval would be incorporated into the project:

Exterior lighting is required to be fully shielded and directed downward to prevent "wash out" onto adjacent properties. Generally, fixtures should accept sodium vapor lamps and not be located at the periphery of the property. Flood lights are not allowed. The lighting shall be installed in accordance with the approved lighting plan during the construction phase.

Lighting for the proposed project would comply with the California Building Code and County regulations. Wall lights would be placed along the north and south perimeter of the property, as well as the property interior to illuminate aisleways, rated at 5,062 lumens. Additionally, a standard condition of approval requires:

All new exterior lighting to be dark sky compliant, low mounted, downward casting and fully shielded to prevent glare. Lighting shall not wash out structures or any portions of the site. Light fixtures shall not be located at the periphery of the property and shall not spill over onto adjacent properties or into the night sky. Flood lights are not permitted. Lighting shall shut off automatically after closing and security lighting shall be motion sensor activated.

By incorporating standard conditions of approval, the project will not result in a new source of substantial light or glare with would adversely affect day or nighttime view in the area.

Significance Level:
Less than Significant Impact

2. AGRICULTURE AND FOREST 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 Dept. of Conservation 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 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 located on land classified as Urban and Built-Up Land on the Sonoma County Important Farmland Map. The project site is not located within any areas identified in the California Department of Conservation Farmland Mapping and Monitoring Program Farmland of Local

Importance list for Sonoma County.

Significance Level:
No Impact

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

Comment:
The proposed project does not occupy a parcel with agricultural zoning and is not subject to a Williamson Act contract. The proposed project area is zoned Industrial Park (MP).

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:
The project site is not under the TP (Timberland Production) zoning district. The proposed project area is zoned Industrial Park (MP).

Significance Level:
No Impact

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

Comment:
The project does not result in a loss of forested land or conversion of forest land to non-forest use as the project site does not contain forest land nor any timber resources.

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 proposed project involves a two-lot subdivision and the development of two warehouses and associated site improvements. The project site is currently vacant and is within a developed industrial park. No agriculture or forest existing on the site.

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:

The project is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD) , which is currently designated as a nonattainment area for state and federal ozone standards, the state PM 10 standard, and the state and federal PM 2.5 standard. The District has adopted an Ozone Attainment Plan and a Clean Air Plan in compliance with Federal and State Clean Air Acts. These plans include measures to achieve compliance with both ozone standards. The plans deal primarily with emissions of ozone precursors (nitrogen oxides (NOx) and volatile organic compounds, also referred to as Reactive Organic Gases (ROG)). Based on thresholds developed by BAAQMD in this report, California Environmental Quality Act Air Quality Guidelines 2022, the proposed use is well below the emission thresholds for PM 10, PM 25 and ozone precursors and does not conflict with or obstruct the implementation of appliable air quality plans.

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:
The project is within the jurisdiction of the Bay Area Air Quality Management District, which is currently designated as a nonattainment area for state and federal ozone standards.

The project will not have a cumulative effect on ozone because it will not generate substantial traffic which would result in substantial emissions of ozone precursors (ROG and NOx). The project is anticipated to generate 194 new average daily trips after both warehouses are operational. The project will have no long-term effect on $PM_{2.5}$ and PM_{10}, because all surfaces will be paved gravel, landscaped or otherwise treated to stabilize bare soils, and dust generation will be insignificant. However, there could be a significant short-term emission of dust (which would include $PM_{2.5}$ and PM_{10}) during construction. These emissions could be significant at the project level, and could also contribute to a cumulative impact.

Although the project will generate some ozone precursors from new vehicle trips (discuss project trip generation if applicable), the project will not have a cumulative effect on ozone because it will not generate substantial traffic resulting in significant new emissions of ozone precursors (ROG and NOx). See discussion in 3 (b) above

Mitigation:
This impact would be reduced to less than significant by including dust control measures as described in the following mitigation measure:

Mitigation Measure AIR-1:
The following dust control measures shall be included in the project:

1) Construction Coordinator shall be designated by the project applicant, and a sign shall be posted on the site including the Contractor's 24-hour phone number for public contact regarding dust, trackout, and air quality complaints. The Contractor shall respond and take corrective action within 48 hours. The Contractor shall report all complaints and their resolutions to Permit Sonoma staff.

2) Water or alternative dust control method shall be sprayed to control dust on construction areas, soil stockpiles, and staging areas during construction as directed by the County.

3) Trucks hauling soil, sand, and other loose materials over public roads shall cover the loads, or shall keep the loads at least two feet below the level of the sides of the container, or shall wet the load sufficiently to prevent dust emissions.

4) Vehicle speeds on unpaved areas shall be limited to 15 miles per hour.

5) Final surfacing (i.e., pavement or concrete, gravel, landscaping) shall be completed as soon as possible after earthwork is finished, unless seeding or soil binders are used.

6) Idling time of diesel-powered construction equipment shall be limited to five minutes. Signs shall be posted reminding workers of this idling restriction at all access points and equipment staging areas during construction of the proposed project.

7) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications and shall have a CARBcertified visible emissions evaluator check equipment prior to use at the site.

8) Trackout shall not be allowed at any active exit from the project site onto an adjacent paved public roadway or shoulder of a paved public roadway that exceeds cumulative 25 linear feet and creates fugitive dust visible emissions without cleaning up such trackout within 4 hours of when the Construction Coordinator identifies such excessive trackout, and shall not allow more than 1 quart of trackout to remain on the adjacent paved public roadway or the paved shoulder of the paved public roadway at the end of any workday.

9) Visible emissions of fugitive dust shall not be allowed during cleanup of any trackout that exceeds 20 percent opacity as determined by the Environmental Protection Agency in Method 203B - Opacity Determination for Time Exception Regulations (August 2017).

10) Trackout is defined by BAAQMD in Regulation 6, Rule 6: Prohibition of Trackout (August 2018) as any sand, soil, dirt, bulk materials or other solid particles from a site that adhere to or agglomerate on the exterior surfaces of vehicles (including tires), and subsequently fall or are dislodged onto a paved public roadway or the paved shoulder of a paved public roadway on the path that vehicles follow at any exit and extending 50 feet out onto the paved public roadway beyond the boundary of the site. Material that has collected on the roadway from erosion is not trackout.

Mitigation Monitoring AIR-1: Permit Sonoma staff shall verify that the AIR-1 measures are included on all site alteration, grading, building or improvement plans prior to issuance of grading or building permits. The applicant shall submit documentation to Permit Sonoma staff that a Construction Coordinator has been designated and that appropriate signage has been posted including the coordinator's phone number. Documentation may include photographic evidence or a site inspection, at the discretion of Permit Sonoma staff.

Significance Level:
Less than Significant Impact with Mitigation

c) Expose sensitive receptors to substantial pollutant concentrations?

Comment:
Certain groups of people are more affected by air pollution than others. California Air Resources Board (CARB) has identified the following persons – classified as "sensitive receptors" – who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

The project site is within a developed industrial park. The nearest residence is over 3,000 feet from

the project work area, and no schools, hospitals, or convalescent facilities are in the surrounding area. Construction could generate short-term dust that may affect nearby receptors; AIR-1 will reduce this impact to less than significant. No new stationary toxic air contaminant sources (e.g., boilers or diesel generators) are proposed. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations.

Significance Level:
Less than Significant with Mitigation Incorporated

Mitigation:
See **Mitigation Measure AIR-1** and **Mitigation Monitoring AIR-1**, above.

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

Comment:
BAAQMD's CEQA Air Quality Guidelines (2017) identify land uses associated with odor complaints to include, but are not limited to, wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. Construction equipment may generate odors during project construction. The impact would be less than significant as it would be a short-term impact that ceases upon completion of the project.

The proposed project would construct two warehouses. As such, no other emissions, such as odors, would be generated by the use.

Significance Level:
No Impact

4. BIOLOGICAL RESOURCES:

A biological assessment was completed for the project by Charles A. Patterson on June 2, 2021. An updated assessment focusing on jurisdictional wetland and listed plant species was submitted on August 16, 2024; both are included as Appendix B.

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 flat with extensive urban development on most of the surrounding lands. Because of past agricultural uses and current site management practices (regular disking and mowing), the site has had most native plant species and virtually all-natural habitat and plant communities displaced, and is currently composed entirely of non-native annual grassland. The site does not contain any wetlands which could support amphibians or vernal pool plants. There are no trees or shrubs to support nesting birds or roosting bats. As a result, the site has very low potential to support rare, endangered, or otherwise sensitive plant or wildlife species.

Multiple surveys have been conducted over multiple years and seasons, including:
2017: June 14
2018: March 20, April 18, May 4, June 13
2019: March 26, April 23, May 14
2020: February 10, April 13, May 27

2021: March 4, April 7, 15, May 13
2024: April 23, May 31, June 26

Plants
No special status plant species have ever been observed during surveys, and therefore, such species are not anticipated to occur due to lack of suitable habitat and lack of observance. Mitigation Measure BIO-1 for pre-construction surveys would ensure that no special status plants are present within project areas and that all impacts are avoided.

Wildlife
The site is not located within Critical Habitat for the California tiger salamander; however, the site is within the boundaries of the Santa Rosa Plain Conservation Strategy, in an area designated as "Windsor Listed Plant Conservation Areas." The Windsor Plant Conservation Area is focused on listed plants and wetlands but is located within the potential range of CTS. There are no potential breeding ponds onsite or nearby, and no known occurrences of CTS within 1.3 miles of the project (the distance adult CTS are estimated to migrate from breeding ponds). Therefore, impacts to CTS habitat or individuals are not anticipated. However, implementation of the Strategy includes a program to accept monetary contributions for impacts to potential upland habitats greater than 1.3 miles from a project site in order to fund future conservation efforts. The recommended mitigation ratio for upland habitat greater than 1.3 miles from a breeding site is 0.2:1. Mitigation Measure BIO-2 would implement the Strategy and ensure no substantial adverse effects would occur.

The site could be used by burrowing owl, although surveys conducted 2017-2021 and in 2024 did not identify any burrowing owls or significant burrow activity that could attract or support burrowing owls. Mitigation Measure BIO-3 for pre-construction surveys would ensure the continued absence of burrowing owls and protection of any nests that may be occupied on the site in the future.

Significance Level:
Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure BIO-1:

Mitigation Measure BIO-1
Within one year prior to the start of project-related ground disturbing activities and during the blooming period for the special status plant species with potential to occur on the site, a qualified

botanist shall conduct protocol-level surveys for special-status plants in all proposed disturbance areas, including temporary features, following survey methods from the CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and*

Natural Communities (CDFW 2018a).

- If special-status plants are not identified, the botanist shall document the findings in a report to the applicant, County, and CDFW, and no further mitigation shall be required.
- If special-status plant species are found, the qualified botanist shall consult with CDFW to determine if an incidental take permit should be obtained (i.e., for special-status species listed under CESA) or if compensatory mitigation would be required. Impacts on special-status plant species shall be mitigated such that there would be no net loss of occupied habitat or individuals. Mitigation measures shall include, at a minimum, preserving and enhancing existing populations, establishing populations through seed collection or transplantation from the site that is to be affected, and restoring or creating habitat in sufficient quantities to achieve no net loss of occupied habitat or individuals.

Mitigation Measure BIO-2:
Mitigate for the loss of 5.57 acres (entire parcel) of potential upland habitat for California tiger salamander by purchasing mitigation bank credits from an approved mitigation bank at a ratio of 0.2:1 (1.11 acre of mitigation credit required).

Mitigation Measure BIO-3:
The following measures shall be taken to avoid potential inadvertent destruction or disturbance of nesting burrowing owls on and near the project site as a result of construction-related vegetation removal and site disturbance:

a. To avoid impacts to burrowing owls, all construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) should occur outside the avian nesting season (generally prior to February 1 or after August 31).

b. If construction-related activities are scheduled to occur during the nesting season (generally February 1 through August 31), a qualified biologist shall conduct a habitat assessment for burrowing owl following Appendix C of the CDFW Staff Report on Burrowing Owl Mitigation (2012 CDFW Staff Report) which shall extend at least 150 meters (492 feet) from the Project site boundary and include burrows and burrow surrogates. If suitable habitat exists, then a qualified biologist shall conduct pre-construction surveys no more than fourteen (14) days prior to initiation of ground disturbing activities following the methodology described in Appendix D (Breeding and Non-breeding Season Surveys) of the 2012 CDFW Staff Report. The qualified biologist conducting the surveys shall be familiar with local ground-nesting species including burrowing owl. Surveys shall be conducted at the appropriate times of day during periods of peak activity (i.e., early morning or dusk) and shall be of sufficient duration to observe movement patterns. Surveys shall be conducted within the project area and 150 meters (492 feet) of the construction limits, as feasible. If the survey area is found to be absent of burrowing owl, no further mitigation is required. However, if project activities are delayed by more than seven days, an additional nesting bird survey shall be performed.

c. If pre-construction nesting bird surveys identify active burrows, no site disturbance (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, demolition, and grading) shall occur until a qualified biologist has established a temporary protective buffer around the nest(s). The buffer shall be of sufficient size to protect the nesting site from construction-related disturbance and shall be established by a qualified biologist. No-work buffers are species- and site-specific, as determined by a qualified biologist. Typically, the no-work radius is 1,000 feet for owls. The nest buffer, where it intersects the project site, shall be staked with orange construction fencing or orange lath staking. Any active burrows shall be monitored by a qualified biologist to ensure compliance with the relevant Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) requirements. The biologist shall document monitoring efforts and provide documentation to the applicant and County. No-work nest protection buffers may be removed and/or reduced if the qualified biologist determines the young have fledged the nest, the nest has otherwise become inactive due to natural cause (i.e., storm events or predation), or if the qualified biologist determines in coordination with CDFW that construction activities are not likely to adversely affect the nest. The qualified biologist and CDFW may agree upon an alternative monitoring schedule depending on the construction activity, season, and species potentially subject to impact.

d. A report of the initial survey findings shall be prepared by a qualified biologist and submitted to the County prior to the issuance of a grading permit. The report shall include recommendations required for the establishment of protective buffers as necessary to protect nesting owls. A final report including all nest monitoring activity (if applicable) shall be submitted to the County and applicable regulatory agencies within 30 days of the completion of ground disturbing activities.

Mitigation Monitoring BIO-1, BIO-3: Prior to grading permit issuance and through completion of initial site disturbance, Permit Sonoma staff shall verify that all surveys have been conducted according to applicable protocols and shall review the results of all pre-construction surveys and any

measures recommended by the biologist to avoid sensitive habitat or species and ensure compliance. If the burrowing owl survey determines protective buffers are necessary, ground disturbing activities shall not be initiated until the applicant provides evidence that nest protection buffers are flagged and fenced off and active nest monitoring has been initiated.

A final monitoring report shall be submitted to the County within 30 days of the completion of ground disturbing activities.

Mitigation Monitoring BIO-2: Prior to issuance of a grading or building permit, the applicant shall provide documentation to Permit Sonoma staff that mitigation credits for California tiger salamander have been purchased from an approved mitigation bank.

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:
There is no riparian habitat or sensitive natural community on the project site. The biological assessment indicates that the site is composed entirely of non-native annual grassland. Thus, no riparian habitat or sensitive natural community would be affected by the project.

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:
Multiple surveys conducted by the applicant's biologist in 2017-2021 and in 2024 indicate that the site is flat, lacking depressions, and vegetated by non-native annual grasses and weeds common in uplands. Both the 2021 report and the 2024 update concluded that the site does not contain jurisdictional wetlands or other waters.

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:

The site does not contain any streams or drainage channels that could be used as wildlife movement corridors or any trees that could be used by nesting birds. The project would not interfere substantially with movement of wildlife through the site and would not impede the use of wildlife nursery sites.

Significance Level:
Less than Significant Impact

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

Comment:

The study area has no trees, nor any other significant woody vegetation. Therefore, no trees would be removed and tree protection policies would not apply to the project.

Significance Level:
No 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:
Habitat Conservation Plans and natural community conservation plans are site-specific plans to address effects on sensitive species of plants and animals. As discussed in 4(a) above, the site is within the boundaries of the Santa Rosa Plain Conservation Strategy Area. Implementation of Mitigation Measure BIO-2 for purchase of mitigation credits to compensate for the loss of 5.57 acres of potential upland habitat for California tiger salamander complies with the Strategy.

Significance Level:
Less than Significant with Mitigation Incorporated

5. CULTURAL RESOURCES:

Would the project:

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

Comment:
The project site is vacant. There are no historical resources on the property, therefore there will be no impact.

Significance Level:
No Impact

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

Comment:
A Cultural Resource Study was conducted for the project site in 2019 (Tom Origer & Associates), which did not identify any cultural resources and determined no resource-specific recommendations were warranted.

In 2025, an updated review of records associated with the California Historical Resources Information System was conducted through referral to the Northwest Information Center (NWIC). NWIC determined that the site continues to have a low possibility of containing unrecorded archaeological resources, and based on that information, no further study for archaeological resources was recommended.

Although the project has a low possibility of containing unrecorded archaeological sites and no impacts to archaeological resources are anticipated, the County has a standard “accidental discovery” condition of approval that work be halted if unanticipated buried cultural resources are encountered during construction. The condition is applied to all permits that involve ground disturbance, and requires that the following notes be printed on all grading and building permit plans involving ground disturbing activities:

“If prehistoric or historic archaeological resources, paleontological resources, or tribal cultural

resources are encountered during ground-disturbing work, all work in the immediate vicinity shall be halted and the operator must immediately notify the Permit and Resource Management Department (PRMD) – Project Review staff of the find. The applicant shall be responsible for the cost to have a qualified paleontologist, archaeologist or tribal cultural resource specialist under contract to evaluate the find and make recommendations to protect the resource in a report to PRMD. Paleontological resources include fossils of animals, plants or other organisms. Prehistoric resources include humanly modified stone, shell, or bones, hearths, firepits, obsidian and chert flaked-stone tools (e.g., projectile points, knives, choppers), midden (culturally darkened soil containing heat-affected rock, artifacts, animal bone, or shellfish remains), stone milling equipment, such as mortars and pestles, and certain sites features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe. Historic resources include all by-products of human use greater than fifty (50) years of age including, backfilled privies, wells, and refuse pits; concrete, stone, or wood structural elements or foundations; and concentrations of metal, glass, and ceramic refuse.

If human remains are encountered, work in the immediate vicinity shall be halted and the operator shall notify PRMD and the Sonoma County Coroner immediately. At the same time, the operator shall be responsible for the cost to have a qualified archaeologist under contract to evaluate the discovery. If the human remains are determined to be of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification so that a Most Likely Descendant can be designated and the appropriate measures implemented in compliance with the California Government Code and Public Resources Code."

Therefore, the proposed project would not result in substantial adverse change in the change in the significance of archaeological resource as defined in CEQA Guidelines Section 15064.5.

Significance Level:
Less thank Significant

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

Comment:
The project site is not located within the vicinity of any known unique paleontological resources or site. However, there is a potential to encounter unknown subsurface human remains as a result of grading and excavation for the project. In the unlikely event the site contains a burial site, compliance with Section 11-14-050 of the Sonoma County Construction Grading and Drainage Code and the accidental discovery standard condition noted above would ensure necessary steps are taken to protect the resource.

Significance Level:
Less than Significant

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:

Construction
Standard construction practices would be used. As such, energy would be required to operate and maintain construction equipment and transport construction materials. Most energy consumption would result from operation of off-road construction equipment and on-road vehicle trips associated

with commutes by construction workers and haul trucks trips. The one-time energy expenditure required to construct the infrastructure associated with the projects would be nonrecoverable.

The energy needs for project construction would be temporary and are not anticipated to require additional capacity or substantially increase peak or base period demands for electricity and other forms of energy. Associated energy consumption would be typical of that associated with warehouses of a similar size. Although the one-time energy expenditure required to construct the project would be nonrecoverable, it would not be consumed in a wasteful, inefficient, or unnecessary manner.

Operational
Operation of the project would require energy consumption in the form of electricity for building and facility operations and fuel for vehicle-based visitation to the project. The project would be built according to the latest Title 24 Building Energy Efficiency Standards. The project would meet State and local building code requirements for energy efficiency. Low Emitting Diode (LED) lighting systems would be installed utilizing lighting timers and dimmers. Transportation energy demand from the implementation of the project would be reduced by Federal and State regulations including the Low Carbon Fuel Standard, Clean Car Standards, and Low Emission Vehicle Program. Thus, the project's energy consumption from construction, building operation, and transportation would not be considered wasteful, inefficient, or unnecessary.

Significance Level:
Less than Significant

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

Comment:
Implementation of the project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As noted above, the project would comply with the latest Title 24 Building Energy Efficiency Standards, which are intended to increase the energy efficiency of new development projects in the State and move the State closer to its zero-net energy goals. The project would meet State and local building code requirements for energy efficiency. LED lighting systems would be installed utilizing lighting timers and dimmers. The project would be automatically enrolled as a member of the Sonoma Clean Power (SCP), which serves as the Community Choice Aggregate (CCA) for the County. SCP works in partnership with Pacific Gas & Electric (PG&E) to deliver GHG-efficient electricity to customers within its member jurisdictions. The project would also be all electric for energy efficiency and fossil fuel use reduction.

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.

Existing geologic conditions that could affect new development are considered in this analysis. Impacts of the environment on the project are analyzed as a matter of County policy and not because such analysis is required by CEQA.

Comment:
The site is not located in a State of California Alquist-Priolo Earthquake Fault Studies Zone or on a known fault based on the Safety Maps in the Sonoma County General Plan. The three closest known active faults are comprised of the Rodgers Creek fault (2 miles to the northeast), the San Andreas fault (19 miles to the southwest), and the Maacama fault (6 ½ miles to the northeast).

Significance Level:
Less than Significant Impact

ii. Strong seismic ground shaking?

Comment:
The site is not located in a State of California Alquist-Priolo Earthquake Fault Studies Zone or on a known fault based on the Safety Maps in the Sonoma County General Plan. The three closest known active faults are comprised of the Rodgers Creek fault (2 miles to the northeast), the San Andreas fault (19 miles to the southwest), and the Maacama fault (6 ½ miles to the northeast). Future damaging earthquakes could occur on any of these faults during the lifetime of the project, with the distance to the causative earthquake epicenter determining the intensity of the ground shaking.

All of Sonoma County is subject to seismic shaking that would result from earthquakes along the San Andreas, Rodgers Creek, and other faults. Predicting seismic events is not possible, nor is providing mitigation that can entirely reduce the potential for injury and damage that could occur during a seismic event. However, by applying geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage from seismic activity can be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake.

The design and construction of new structures are subject to engineering standards of the California Building Code (CBC), which takes into account soil properties, seismic shaking, and foundation type. Project conditions of approval require that building permits be obtained for all construction and that the project meet all standard seismic and soil test/compaction requirements. The project would, therefore, not expose people to substantial risk of injury from seismic shaking.

Significance Level:
Less than Significant

iii. Seismic-related ground failure, including liquefaction?

Comment:
During a strong seismic ground shaking event possible earthquake effects can occur. The project site has a low risk of fault rupture, lateral spreading and lurching, landslides, and expansive soil shrink and swell cycles.

Fault Rupture. Rupture of the ground surface is expected to occur along known active fault traces. According to the State of California, no active faults exist at or near the project site. Therefore, the likelihood of ground rupture at the site due to faulting is considered to be low. While fault rupture cannot be entirely dismissed because the site is located in an active tectonic area, the degree of risk is low.

Ground Shaking. The site has been subjected in the past to ground shaking by earthquakes on active fault systems that traverse the region. It is believed that earthquakes with significant ground shaking will occur in the region within the next several decades, and the project site could be subjected to strong ground shaking during the design life of the project. However, construction would occur in accordance with State and County regulations directed at minimizing the risk to people and structures due to ground shaking.

Lateral Spreading and Lurching. Lateral spreading is normally induced by vibration of near-

horizontal alluvial soil layers adjacent to an exposed face. Lurching is an action that produces cracks or fissures parallel to streams or banks when the earthquake motion is at right angles to them. There are no creeks or exposed faces at or near the project site. Therefore, the risk of lateral spreading and lurching at the building site is low.

Liquefaction. Liquefaction is the sudden loss of shear strength in saturated sandy material. According to the Association of Bay Area Governments (ABAG), the site is located in an area that is considered to have low liquefaction susceptibility. Areas of Sonoma County most at risk of liquefaction are along San Pablo Bay and in alluvial valleys. The subject site is not identified on the map in Safety Element (PS-1c) as Very High, High or Medium Liquefaction Hazard Areas. Additionally, exploratory boreholes conducted at the project site encountered shallow bedrock, which is not considered prone to liquefaction. Therefore, liquefaction occurring at the site is low.

Significance Level:
Less than Significant Impact

iv. Landslides?

Comment:
There are no landslides on or adjacent to the project site. The site is mapped in an area of greatest relative stability due to low slope inclination. The risk of landsliding at the site is low.

Significance Level:
Less than Significant Impact

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

Comment:
The project site is generally flat. The project would require finish grading to accommodate the new warehouses. Unregulated grading, both during and post construction, has the potential to increase the volume of runoff from a site, which could have adverse downstream flooding and further erosion impacts. An increase in soil erosion on- and off-site could adversely impact downstream water quality. The project must comply with the County's Grading and Drainage Ordinance and stormwater/LID best-management practices, which are aimed at minimizing disturbed area, controlling run-on/runoff, and preventing sediment discharge (e.g., silt fence, straw wattles, stabilized construction entrance, materials containment). These measures are reviewed and enforced through the grading permit process and field inspections. With standard erosion control and LID measures in place, substantial erosion or loss of topsoil is not anticipated.

Significance Level:
Less than Significant Impact

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:
The project site could be subject to ground shaking during a seismic event. The project site and surrounding areas are not located in an area prone to landslides or in an area subject to lateral spreading, subsidence, liquefaction, or collapse. See also discussions under items 6 (a) ii, iii, and iv, above.

Significance Level:
Less than Significant

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:
Table 18-1-B of the Uniform Building Code is an index of the relative expansive characteristics of soil as determined through laboratory testing. A Soil Investigation Report was prepared by Reese & Associates Consulting Geotechnical Engineers, January 13, 2025. The conclusion of the report is that the site can be used for the proposed construction with the implementation of their recommendations presented in the report. Therefore, risks from expansive soils would be less than significant.

Significance Level:
Less than Significant Impact

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Comment:
The proposed project will be supported by public sanitary sewer, which will be provided by the Sonoma County Airport Sanitation District therefore onsite septic tanks will not be necessary.

Significance Level:
No Impact

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

Comment:
There are no known unique geologic features on the site, and no paleontological resources have been recorded for the work area. However, there is a potential for unknown subsurface paleontological resources to be encountered during project construction and grading, which could result in a potentially significant impact to paleontological resources.

In the unlikely event that a fossil or other paleontological resource is unearthed during excavation, the County's standard inadvertent-discovery condition of approval (see 5 (b) above) requires immediate work stoppage in the vicinity of the find, notification to Permit Sonoma, and evaluation by a qualified paleontologist (or other appropriate specialist) with recommendations to protect the resource before work can resume. This measure is printed on grading/earthwork plans and enforced through permit review and field inspections.

Significance Level:
Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure GEO-1:
If any paleontological resources are found during grading and construction activities, all work within 100 feet of the find shall cease, the County of Sonoma shall be notified, and the applicant shall retain an appropriately qualified paleontologist to determine the significance of the discovery. A Qualified Paleontologist shall evaluate the discovery, including defining the physical extent and nature of the deposit. If necessary, the evaluation shall include preparation of a treatment plan, such as avoidance of the discovery, documentation of the paleontological resources, or salvage of palaeontologic resources, to mitigate any significant impacts to paleontological resources.

Mitigation Monitoring GEO-1: Building/grading permits shall not be approved for issuance by Permit Sonoma staff until the above note is printed on all construction plans including plans for building and grading. If any paleontological resources are found during grading and construction activities, a final monitoring report shall be submitted to the County within 30 days or completion of ground disturbing activities

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:
Section 15064.4 of the State CEQA Guidelines assists lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 gives lead agencies the discretion to assess emissions quantitatively or qualitatively. The CEQA Guidelines do not establish a threshold of significance. Lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or other experts, so long as any threshold chosen is supported by substantial evidence.

The Bay Area Air Quality Management District's (BAAQMD) 2022 *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects* acknowledges that evaluating climate impacts under CEQA can be challenging because global climate change is inherently a cumulative problem, rather than the result of a single source of greenhouse gas (GHG) emissions. With that in mind, the BAAQMD has recommended thresholds of significance as to whether a proposed project would have a "cumulatively considerable" contribution to the significant cumulative impact on climate change.

For land use development projects, the BAAQMD recommends using an approach which evaluates a project based on its effect on California's efforts to meet the State's long-term climate goals. Using this approach, a project that is consistent with and would contribute its "fair share" towards achieving those long-term climate goals can be found to have a less-than-significant impact on climate change under CEQA because the project would, in effect, help to solve the problem of global climate change. Applying this approach, the Air District has analyzed what will be required of new land use development projects to achieve California's long-term climate goal of carbon neutrality by 2045.

Because GHG emissions from the land use sector come primarily from building energy use and from transportation, these are the areas that the BAAQMD evaluated to ensure that a project can and will do its fair share to achieve carbon neutrality. With respect to building energy use, the BAAQMD recommends replacing natural gas with electric power and eliminating inefficient or wasteful energy usage. This will support California's transition away from fossil fuel–based energy sources and will bring a project's GHG emissions associated with building energy use down to zero as the state's electric supply becomes 100 percent carbon free. With respect to transportation, the BAAQMD recommends that projects be designed to reduce project-generated Vehicle Miles Travelled (VMT) and to provide sufficient electric vehicle (EV) charging infrastructure to support a shift to EVs over time.

The BAAQMB has found, based on this analysis, that a new land use development project being built today either must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b), or must incorporate the following design elements to achieve its "fair share" of implementing the goal of carbon neutrality by 2045:

A. Projects must include, at a minimum, the following project design elements:
    1. Buildings

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

2. Transportation
   a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's (OPR) 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA:
      i. Residential projects: 15 percent below the existing VMT per capita
      ii. Office projects: 15 percent below the existing VMT per employee
      iii. Retail projects: no net increase in existing VMT
   b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

There is currently no applicable local GHG reduction strategy, like an adopted Climate Action Plan, for Sonoma County. Therefore, the project was analyzed under criterium A above, as discussed below.

Buildings: As discussed in the Energy Section 6a, the project includes new construction. Plans for the new structures do not include the use of natural gas appliances or natural gas plumbing; the site will use electrical power from Sonoma Clean Power.

Transportation:
GHG emissions associated with development of the proposed project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal. Emissions for the proposed project are discussed below and were analyzed using the methodology recommended in the BAAQMD CEQA Air Quality Guidelines.

Construction GHG Emissions
GHG emissions associated with construction were computed to be 467 metric tons (MT) of CO_2e for the total construction period. These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the County nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions, although BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. BAAQMD also encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable.

Operational GHG Emissions
As discussed in the Transportation Section 17b, VMT (vehicle miles traveled) refers to the amount and distance of automobile travel attributable to a project. The Project VMT was calculated based on employee trips and was determined to be 8.02 VMT per employee, which falls far below the regional average of 16.9 and is also below the significance threshold of 85% or less of the regional average (which is 14.4).

The latest California Green Building Standards Code (CALGreen) was published in 2022 and went into effect, with any local amendments, on January 1, 2023. The 2022 CALGreen Tier 2 requirements for EV changing stations apply to new non-residential buildings and require that off-street EV capable spaces be provided for new non-residential development projects with 10 or more parking spaces (note there are separate EV requirements for residential projects). The two projects combined propose 42 employee parking spaces, including 14 designated carpool/EV capable charging stations as required by the current CALGreen Standards.

Threshold A Project Conformance
Because the project does not propose the use of natural gas, would use minimal energy, would generate low VMT (less than 85% of the regional average), and meets 2022 CALGreen requirements for EV charging stations, the project would contribute its "fair share" towards achieving the State's long-term climate goals, and therefore, would have a less-than-significant impact on climate change.

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:
The County's adopted goals and policies include GP Policy OSRC-14.4 to reduce GHG emissions to 25 percent below 1990 levels by 2015. Sonoma County emissions in 2015 were nine percent below 1990 levels, while the countywide population grew four percent.

In May 2018, the County Board of Supervisors adopted a Resolution of Intent to Reduce Greenhouse Gas Emissions that included adoption of the Regional Climate Protection Agency's goal to further reduce GHG emissions by 40 percent below 1990 levels by 2030 and by 80 percent below 1990 levels by 2050, consistent with the State's climate pollution reduction targets (Senate Bill (SB) 32 and Assembly Bill (AB) 197). The Resolution of Intent included specific measures that can further reduce GHG emissions.

All new development is required to evaluate all reasonably feasible measures to reduce GHG emissions and enhance carbon sequestration. The following GHG emission reduction measures were incorporated into the project by the applicant and are included as a condition of approval:

- Electrical Service will come from Sonoma Clean Power.
- No on-site natural gas or propane usage.
- Construction to CalGreen Standards or higher.

By incorporating these project elements, the project would be consistent with the Resolution of Intent and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

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?

Comment:
The project uses do not involve the routine transport, use, or disposal of hazardous materials. However, it is possible that improper handling or storage could result in minor spills or drips of hazardous materials such as oil, fuel, or paint during or after construction. To address this possibility, the project is required to comply with all applicable hazardous materials handling and storage requirements and would use qualified contractors for construction.

During operations, the storage, use, and disposal of hazardous materials would be associated with

household hazardous materials such as cleaners, paint, and landscape maintenance chemicals. Hazardous materials similar to those used during construction could also be used periodically as part of operation, maintenance, and repair of the utilities infrastructure and facilities.

The project applicant, builders, and contractors would be required to use, store, and transport hazardous materials in accordance with local, State, and Federal regulations, including Cal/OSHA and State Department of Toxic Substance Control (DTSC) requirements and manufacturer's instructions. In so doing, impacts would be less than significant.

Significance Level:
Less than Significant Impact

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:
Based on a review of aerial photographs, the project site was historically used for agricultural purposes. There is a potential that agricultural chemicals, such as pesticides, herbicides, and fertilizers, were used on-site, and that the project site has been affected by the use of such agricultural chemicals. In general, historical agricultural use is not the subject of environmental enforcement actions by regulatory agencies and, therefore, would be considered a de minimis condition

During construction, there could be spills of hazardous materials. See Item 8.a. above.

Significance Level:
Less than Significant Impact

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:
The project site is not located within one-quarter mile of an existing or proposed school. The nearest school to the project is Sonoma Day School located three-quarter mile from the site. The proposed construction of the warehouses would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste.

Significance Level:
Less than Significant

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:
Section 65962.5(a)(1) requires that DTSC "shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: ….(1) [a]ll hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code ("HSC")." DTSC uses the EnviroStor database as a source of hazardous substance release sites. An EnviroStor search was conducted for the project site. The proposed project is not located on a site identified as a hazardous materials site.

Significance Level:
No 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 is located within the Airport Referral Areas designated by the Sonoma County Comprehensive Land Use Plan (CALUP). The project was reviewed for compliance with the CALUP and it was found that the project is consistent with allowed population density and noise compatibility standards.

Significance Level:
Less than Significant Impact

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

Comment:
The project would not impair implementation of or physically interfere with the County's adopted emergency operations plan. There is no separate emergency evacuation plan for the County. In any case, the project would not change existing circulation patterns significantly and would have no effect on emergency response routes.

Significance Level:
No Impact

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

Comment:
According to the Safety Element of the General Plan, the project site is not located in a high wildland fire hazard area. It is located within a non-wildland area. The construction of new structures in accordance with current building standards would decrease the fire risk to structures on the project parcel. New construction on the site would conform to County Fire Safe Standards building requirements. Fire Safe Standards include building requirements related to fire sprinklers, stairways, roofs, fire apparatus access roads, door panic hardware, fire resistant stairway enclosures, emergency water supply (in the form of an approximately 100,000 gallon water tank), and defensible space would be utilized. The construction of new structures in accordance with current building standards should decrease the risk to the proposed project. Fire abatement measures would be supported by a fire pump and the proposed water storage tank . The project would not require installation or maintenance of associated infrastructure that would exacerbate fire risk. The project would not expose people to significant risk from wildland fires.

Significance Level:
Less than Significant

10. HYDROLOGY AND WATER QUALITY:

The following analysis is based on information contained in the Initial SWLID for the Frito Lay and Speculative Warehouse prepared by Brelje & Race Consulting Engineers, February 5, 2025

Would the project:

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

Comment:

The project site is currently an undeveloped lot consisting of primarily non-native grasses. The project site slopes north to south of the western portion of the project. Precipitation-based surface water runoff in the western portion sheet flows towards an existing inlet at the southwest corner of the site which connects to the public storm drain network in Aviation Boulevard. The eastern portion of the project site slopes south to north. Runoff in the northeast portion of the site flows into an existing inlet, which Frito Lay Warehouse Initial SWLID indicates connects to the existing public storm drain with the private roadway on the adjoining APN 059-271-042 site to the east.

Storm water run-on to this site is negligible as the adjacent parcels are developed roadways and parking areas and do not direct drainage onto this site. Additionally, the separate Aviation Blvd Warehouse project does not propose to direct drainage to the Frito Lay Warehouse project site.

The project design has incorporated pollution source controls intended to prevent pollutants from entering the storm drain system. These source controls include:

- The site landscape and hardscape will be maintained, swept clean and with landscape leaves and debris removed on a regular schedule over the course of the year.
- Irrigation overspray and runoff from the site shall be minimized.
- Amounts of pesticides shall be minimized.
- Landscaped areas shall be properly maintained and cleaned.
- Driveways and parking lot shall be swept on a regular basis.
- Number of parking stalls is minimized. Driveway widths are reduced to practical minimum.
- Storm drain inlets will be clearly marked with the words “No Dumping, Drains to Creek”.
- Covering trash enclosures.
- Disconnecting of roof rainwater leaders where practical and discharge with splash block outlets into landscaped areas to encourage infiltration and treatment.
- Direct storm water by sheet flow through landscaped areas prior to entering storm drain.

Significance Level:
Less than Significant Impact

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

Comment:
Water would be provided by the Town of Windsor Water District. The project does not rely on groundwater wells and would not impact groundwater supply or groundwater recharge.

Significance Level:
No 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 increase off-site drainage patterns and would employ strategies designed to infiltrate stormwater through interceptor trees, landscaping, a large swale, and two retention basins, complying with Hydromodification 100% Volume Capture requirements. Runoff Reduction Measures include the existing established evergreen large-diameter and deciduous interceptor trees. Retention basins would collect any excess runoff on-site, ensuring flow rates off-site do not exceed current levels.

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 would comply with Sonoma County LID standards requiring 100 percent on-site infiltration of the design storm (one inch of rain over 24 hours). The infiltration features incorporated in the site design would capture the storm water runoff for most small to moderate precipitation events throughout the year.

In accordance with Sonoma County Code (Section 36.16.030) the project's drainage systems would be designed to maintain pre-project drainage patterns and to convey the 25-year design storm without causing on- or off-site flooding. The drainage systems would be engineered to the specification of the Sonoma County Flood Management Design Manual and would undergo a comprehensive review by the Sonoma County Water Agency before permit approval. This review would ensure that the hydrologic analysis for the project considers the prescribed design storm, local precipitation rates, rainfall intensity, and runoff coefficients, and that the applicant has used an appropriate hydrologic baseline. The proposed drainage improvements must also demonstrate that the project would not cause adverse flooding or drainage effects to existing or proposed structures or to adjacent properties. Because the Sonoma County permitting process includes protections through the drainage system design and review, the potential for the potential for the projects to result in on- or off-site flooding 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:
See discussion above under items 10(a) and (c)

Significance Level:
Less than Significant Impact

iv. Impede or redirect flood flows?

Comment:
See discussion above under items 10(a) and (c)

Significance Level:
Less than Significant Impact

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

Comment:
The project is not located in a flood hazard, tsunami, or seiche zone.

Significance Level:
No Impact

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

Comment:
The project site is located in a priority groundwater basin (Santa Rosa Valley) as defined under the Sustainable Groundwater Management Act (SGMA).

However, the project does not use groundwater (municipal water provided by the Town of Windsor) and would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan.

Significance Level:
No Impact

11. LAND USE AND PLANNING:

Would the project:

a) Physically divide an established community?

Comment:
The proposed project involves a two-lot subdivision and Design Review for two new warehouses within an existing industrial park. The project would not physically divide an established community.

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 would not conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect, including in the Sonoma County General Plan and zoning ordinance.

Significance Level:
No 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:
Sonoma County has adopted the Aggregate Resources Management Plan that identifies aggregate resources of statewide or regional significance (areas classified as MRZ-2 by the State Geologist). The project site is not located within a known mineral resource deposit area.

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 not located within an area of locally-important mineral resource recovery site and the site is not zoned MR (Mineral Resources) (Sonoma County Aggregate Resources Management Plan, as amended 2010 and Sonoma County Zoning Code). No locally-important mineral resources are known to occur at the site.

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 primary goal of the Noise Element of the Sonoma County General Plan is to protect people from the adverse effects of exposure to excessive noise and to achieve an environment in which people and land uses function without impairment from noise."

County noise standards for non-transportation operational noise (as indicated in Table NE-2 of the General Plan) establish a maximum allowable exterior noise exposure of 50 dBA in the daytime (7:00 AM to 10:00 PM) and 45 dBA in the nighttime (10:00 PM to 7:00 AM), as measured using the L50 value (the value exceeded 50 percent of the time, or 30 minutes in any hour – i.e., the median noise level).

Table 3. Maximum Allowable Exterior Noise Exposures for Non-transportation Noise Sources
(Table NE-2 from General Plan)

Hourly Noise Metric[1], dBA	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.)
L50 (30 minutes in any hour)	50	45
L25 (15 minutes in any hour)	55	50
L08 (4 minutes 48 seconds in any hour)	60	55
L02 (72 seconds in any hour)	65	60
[1] The sound level exceeded n% of the time in any hour. For example, the L50 is the value exceeded 50% of the time or 30 minutes in any hour; this is the median noise level.		

The existing noise environment for the project area is characterized by vehicular noise and industrial uses noise. Operational noise generated by the project would be similar to other industrial uses in the surrounding area, consisting primarily of onsite mechanical equipment and vehicle noise from employees, route delivery trucks/vans, and semi-trucks mostly occurring during daytime hours (delivery route truck drivers may start pre-dawn). Due to the project site location within an industrial park, there are no noise-sensitive uses nearby (e.g., residences, schools, hospitals, churches). The nearest residential uses are greater than half a mile to the northwest, separated from the site by multiple developed industrial properties. Given the distance from sensitive receptors and the existing ambient noise setting in the surrounding industrial park, operational noise is not anticipated to exceed standards.

The project does not propose noise sensitive land uses. (Noise sensitive land uses are generally such uses as residences; schools; hospitals; nursing homes; long-term, and medical or mental care facilities; churches; and libraries.) Because the project does not propose any noise sensitive land uses, the project avoids locating noise sensitive land uses in a noise impacted area.

Neither the General Plan nor the County Code establishes any noise thresholds or standards for temporary construction activities; therefore, construction-related noise would not exceed standards. However, see 12.d. below for a discussion of temporary construction noise which is not governed by County standards.

Significance Level:
Less than Significant

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

Comment:
Proposed project construction could result in vibration due to grading and compacting, as well as the construction of the warehouses. The primary noise source from project construction (including grading and building construction) would be from site preparation. Haul trucks could be used to import/export fill to/from the project site. Sound levels of typical construction equipment range from approximately 65 to 95 dBA at 50 feet from the source. Worst-case noise levels are typically associated with grading. Grading could require the use of heavy equipment such as bulldozers, loaders, and scrapers. Construction activities that may generate minor ground borne vibration and noise from conventional construction equipment, but no intensive vibratory noise would occur, such as pile-driving or jackhammering. Construction noise would be temporary, would occur primarily during day-time hours and on weekdays, and would cease once construction is complete. Project construction noise impacts would be less than significant.

Significance Level:
Less than Significant

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 located within the boundaries of the Airport Land Use Plan. The proposed project was found to be consistent with the Comprehensive Airport Land Use Plan noise policies and compatibility standards.

Significance Level:
Less than Significant

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 project proposes a two-lot subdivision and the construction of one new warehouse on each of the two newly created parcels. The project would not include construction of new housing, nor would it generate significant new demand for housing in the area (the two warehouses combined would support approximately 55 employees at full buildout). This increase in employment opportunities is not anticipated to result in an indirect increase in population as it is anticipated that employees would be existing residents of the area. Therefore, the project would not induce substantial population growth in the area.

Significance Level:
No Impact

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

Comment:
The proposed project does not include any housing and the project site is currently vacant. Thus, the project would not displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere.

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:

Comment:
The project would not increase residents or employees such that governmental services and/or facilities will have to be expanded. The project would add approximately 55 new employees however it would not result in the need for new or physically altered public services and would not substantially affect service ratios, response times, or other performance objectives for any of the public services.

Significance Level:
Less than Significant Impact

i. Fire protection?

Comment:
The Sonoma County Fire District would continue to serve the project site; existing fire protection facilities are anticipated to be adequate to serve two new businesses. Therefore, the project would not necessitate or facilitate construction of new fire protection facilities in order to maintain acceptable service ratios or response times.

Significance Level:
Less than Significant Impact

ii. Police?

Comment:
The project site and surrounding area are served by the Sonoma County Sheriff's Department. The Sheriff's Department will continue to serve this area. There would be no increased need for police protection resulting from this project.

Significance Level:
Less than Significant Level

iii. Schools?

Comment:
The project proposes a two-lot subdivision and construction of two new warehouses. Development fees to offset potential impacts to public services, including school fees, are required by Sonoma County Code and state law for new subdivisions and residential developments. The proposed use does not include residential development and would not generate students. Thus, the project would not contribute to an increase in the need for expanded or additional schools.

Significance Level:
No Impact

iv. Parks?

Comment:
The project proposes a two-lot subdivision and the construction of two new warehouses. Development fees to offset potential impacts to public services, including parks fees, are required by Sonoma County Code and state law for new subdivisions and residential developments. The proposed use would not result in an increase in residents using public parks. Thus, the project would not contribute to an increase in the need for expanded or additional parks.

Significance Level:
No Impact

v. Other public facilities?

Comment:
The project would not increase residents or employees such that governmental services and/or facilities will have to be expanded. The project would not result in the need for new or physically altered public services and would not substantially affect service ratios, response times, or other performance objectives for any of the public services.

Significance Level:
Less than Significant 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 project proposes a two-lot subdivision and the construction of two new warehouses. The

proposed project would not involve activities that would cause or accelerate substantial physical deterioration of parks or recreational facilities. The project will have no impact on the use of existing neighborhood and regional parks or other recreational facilities.

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 project proposes a two-lot subdivision and the construction of two new warehouses. The proposed project does not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment as it does not propose to build any recreational uses.

Significance Level:
No Impact

17. TRANSPORTATION:

A Transportation Impact Study was performed for the project by W-Trans (September 2025) and is included as Appendix D.

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 proposed project two warehouses building of 24, 726 square feet and 21,312 square feet.

The County' General Plan and Bicycle Master Plan provide policies relevant to the proposed project. The proposed project is generally complaint with the County policy, the site plan will be updated to include bike parking on-site.

Objective 7.0 Land Use Encourage smart growth land use strategies by planning, designing and constructing bicycle and pedestrian facilities in new development.

Policy CT-1i Encourage circulation and transit system improvements identified on Figures CT-1a through CT-1i, and CT-2 that improve access to jobs within the County.

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

Policy CT-3b Use the policies of the Bikeways Plan whenever reviewing development projects to ensure that projects are consistent with the Bikeways Plan and incorporate necessary bicycle and pedestrian improvements identified in the Bikeways Plan as a condition of project approval.

Policy CT-3ee Encourage the use of flexible parking, circulation and road design standards for higher density residential and mixed-use projects that make walking and bicycling the preferred mode of transportation within the project and surrounding area.

Policy CT-3ff Provide adequate bicycle parking as part of all new school, public transit stops, public facilities, and commercial, industrial, and retail development following standards established in adopted Bikeways Plan.

The Sonoma County Airport Industrial Area Specific Plan, which is currently undergoing an update, indicates where sidewalks are required and where they are not. Sidewalks are not required on the north side of Aviation Boulevard, so lack of sidewalk is consistent with the Specific Plan and development on adjacent parcels.

There are no existing transit routes on Aviation Boulevard nor are there any planned bike facilities. However, the project is required to provide bicycle parking that is equal to 20 percent of the vehicle parking. Bicycle parking will be required by condition of approval to comply with County policy at a ratio of 1 space per vehicle space (not including delivery truck spaces), which equates to 6 bicycle parking spaces at the Frito Lay warehouse and 3 spaces at the tenant warehouse.

Significance Level:
Less than Significant Impact

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

Comment:
The potential for the project to conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) was evaluated based on the project's anticipated Vehicle Miles Traveled (VMT).

Like many other jurisdictions in California, the County of Sonoma has not yet adopted policies or thresholds of significance regarding VMT. The County has generally been relying on guidance provided in the Technical Advisory on Evaluating Transportation Impacts in CEQA, 2018, developed by the state's Office of Planning and Research (OPR), referred to herein as the Technical Advisory. While the Technical Advisory addresses office land use types, it does not address industrial, warehouse, or distribution uses, indicating that lead agencies may develop their own thresholds for other land use types, and allowing assessment on a case-by-case basis.

The Technical Advisory provides no guidance on how to assess the VMT associated with delivery activity. However, both the Technical Advisory and CEQA Guidelines Section 15064.3 state "vehicle miles traveled refers to the amount and distance of automobile travel attributable to a project." The Technical Advisory indicates "the term 'automobile' refers to on-road passenger vehicles, specifically cars and light duty trucks." Based on this guidance, W-Trans determined that the project's delivery operations would not be subject to VMT analysis; the delivery van and trucking VMT would be excluded from the transportation analysis (note that heavy vehicle VMT is still assessed in CEQA greenhouse gas analyses).

For the employment component of the proposed project, VMT impacts are assessed by analyzing the projected VMT per employee. This performance metric represents the VMT associated with home-based commute vehicular travel, measured in miles, divided by the projected number of employees generating the travel. The OPR Technical Advisory indicates that employment-based VMT in unincorporated county areas should be compared to a regional average, which for Sonoma County corresponds to the nine-county Bay Area, as directed by County Staff.

The SCTM19 travel demand model includes detailed land use and multimodal network coding within the County of Sonoma. While the model accounts for regional travel and VMT extending beyond the County, it does not include detailed modeling data for the entire nine-county Bay Area. Accordingly, for the purposes of establishing an appropriate regional VMT per Employee benchmark, SCTA has recommended that this metric be obtained from the 2019 Transportation Authority of Marin Travel Demand Model (TAMDM), which does include the entire Bay Area region and calculates VMT per Employee using a methodology that is compatible with the values output from SCTM19. The TAMDM-reported regional average VMT per employee is 16.9 miles (as cited in the Transportation Analysis Guidelines, City of San Rafael, 2021).

As directed by the County in accordance with guidance contained in the OPR Technical Advisory, the VMT significance threshold established for employment uses is 85 percent or less of the regional average. The applicable significance threshold is therefore equal to 14.4 VMT per employee.

Based on projections obtained from the SCTM19 model for the TAZ encompassing the project site (TAZ 83), the project's employment component is anticipated to generate 8.02 VMT per employee, which falls below the applied significance threshold of 14.4 VMT per employee. Accordingly, the project would be expected to have a less-than-significant impact on VMT for employee travel.

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:
The potential for the project to impact safety was evaluated in terms of the adequacy of sight distance at the project driveways. Aviation Boulevard has a center two-way left-turn lane, so the need for a left-turn lane at the project driveway was not evaluated.

Sight distances along Aviation Boulevard at the proposed driveway connections were evaluated based on sight distance criteria contained in County Standard 812, which is based on A Policy on Geometric Design of Highways and Streets published by the American Association of State Highway and Transportation Officials (AASHTO). These guidelines include recommended sight distances at rural county driveways and private road intersections, including stopping-sight distances for drivers traveling along the major approaches and for drivers of stopped vehicles at the minor street approaches and driveways. These recommendations are based upon approach travel speeds. With a posted speed limit of 35 mph the required stopping sight distance is 250 feet.

Due to the relatively flat nature and straight alignment of Aviation Boulevard, sight distances were measured using Google Maps imagery. These measurements indicate that sight distances exceed 300 feet along Aviation Boulevard at the proposed driveway locations, which is adequate for speeds well above the posted speed limit.

The project would have a less-than-significant impact on transportation safety, as there is an existing two-way left-turn lane serving the project site and there is adequate sight distance at the proposed driveway locations.

Significance Level:
Less than Significant Impact

d) Result in inadequate emergency access?

Comment:
Adequacy of Site Access

As designed, all driveways and internal access roads for the project site would be of sufficient width to accommodate semi-trucks delivering products, so would also be adequate for emergency response vehicles. Sonoma County Municipal Code Section 13-29 states that all buildings must be accessible to emergency fire equipment by a road or driveway constructed to within 150 feet of any portion of an exterior wall of the first story of the building. The project would satisfy this requirement. Additionally, the driveways are of sufficient width to accommodate turning movements by emergency responders. As a result, there are no anticipated issues associated with emergency response vehicles accessing the project site.

Off-Site Impacts

The addition of project-generated traffic would have a limited effect on operations and would therefore result in a nominal increase in response times. All traffic is required by law to pull to the side to allow emergency responders traveling with their lights and sirens operating so response times would not be expected to change.

The proposed project would be accessible for emergency response vehicles and project trips would not impede emergency responders, resulting in a less-than-significant impact on emergency response

Significance Level:
Less than Significant Impact

18. TRIBAL CULTURAL RESOURCES:

State Regulations

CEQA requires that a lead agency determine whether a project could have a significant effect on historical resources and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). A historical resource is one listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR, PRC Section 21084.1), a resource included in a local register of historical resources (PRC Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (PRC Section 15064.5[a][3]).

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

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion or eligibility for inclusion in the CRHR (*CEQA Guidelines* Section 15064.5[b][2][A]).

California Public Resources Code

Section 5097.5 of the California PRC states:

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

As used in this PRC section, “public lands” means lands owned by or under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

Codes Governing Human Remains

The disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC

sections 5097.94 and 5097.98 and falls within the jurisdiction of the Native American Heritage Commission (NAHC). If human remains are discovered, the county coroner must be notified within 48 hours, and there should be no further disturbance to the site where the remains were found. If the coroner determines the remains are Native American, the coroner is responsible to contact the NAHC within 24 hours. Pursuant to PRC Section 5097.98, the NAHC will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

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:
California Native American tribes were notified according to Public Resources Code section 21080.3.1 on March 5, 2025. Permit Resource Management Department (PRMD) staff referred the project application to Native American Tribes within Sonoma County to request consultation under AB52. Notifications were sent to the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Torres Martinez Desert Cahuilla Indians, Mishewal Wappo Tribe of Alexander Valley, Middletown Rancheria Band of Pomo Indians, Lytton Rancheria of California, Kashia Pomos Stewarts Point Rancheria, and Federated Indians of Graton Rancheria.

Lytton Rancheria responded on March 17, 2025, requesting an archaeological study. The Cultural Resource Study conducted for the project site in 2019 (Tom Origer & Associates) was sent to the Tribe, as requested, on April 18, 2025. The Tribe responded on April 28, 2025 that, after reviewing the report, they had no concerns and did not request further consultation. No requests were received from other Tribes. The 30-day consultation period ended on April 4, 2025.

Although no impacts are anticipated, the County standard “Accidental Discovery” Condition of Approval applies to previously undiscovered TCR’s or unique archaeological resources that may be accidentally encountered during project implementation.

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 proposed project would be served by the Town of Windsor Water District and public sanitary sewer would be provided by the Sonoma County Airport Sanitation District. The proposed project would not require the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage utilities.

The project will meet State and local building code requirements for energy efficiency. LED lighting systems would be installed utilizing lighting timers and dimmers. Transportation energy demand from the implementation of the projects would be reduced by Federal and State regulations, including the Low Carbon Fuel Standard, Clean Car Standards, and Low Emission Vehicle Program. Thus, the project's energy consumption from construction, building operation, and transportation would not be considered wasteful, inefficient, or unnecessary. The project would not result in the relocation or construction of electric power utilities.

The project does not propose a natural gas connection and would not result in the relocation or construction of new natural gas facilities.

The project does not propose uses which would result in the construction of new telecommunications facilities expected to cause significant environmental effects.

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 be served by the Town of Windsor Water District, a Will Serve letter shall be required as a Condition of Approval for both warehouses prior to building permit issuance.

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:
The project would be served by Sonoma County Airport Sanitation District, a Will Serve Letter shall be required as a condition of approval for both warehouses prior to building permit issuance.

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:
During construction, the proposed project would follow a construction recycling plan. Once operational, trash would be collected and placed in new trash enclosures on the northeast side of the site for pick up by Sonoma Marin Recology.

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 project would comply with all policies, ordinances, and regulations related to solid waste diversion, including composting and recycling. The project would not impair the attainment of solid waste reduction or diversion goals.

Significance Level:
Less than Significant

20. WILDFIRE

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

The proposed project is not located in or near a state responsibility area or lands classified as very high fire severity zones. The project site is located within the Fire Protection Local Response Area and is not in a Wildland Fire Hazard Severity Zone**.** The closest High Fire Hazard Severity Zone is approximately 4 miles to the east in the Shiloh hills and the closest Very High Fire Hazard Severity Zone is approximately 6.75 miles to the east further up into the Diamond Mountain and Chalk Mountain range.

The project would not have any effect on wildfire risk or wildfire evacuation responses.

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

Comment:

Significance Level:

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:

Significance Level:

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:

Significance Level:

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:

Significance Level:

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:
The proposed project does not have the potential for degrading 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.

Potential project impacts on special status plants or animal community are addressed in Item 4, Biology. Implementation of required Mitigation Measures BIO-1, BIO-2 and BIO-3 which includes pre-construction habitat surveys and purchase of mitigation bank credits would reduce the potential impact to a less-than-significant level.

Potential adverse project impacts to buried paleontological resources are addressed in Item 7, Geology and Soils. Implementation of required Mitigation Measure GEO-1 to stop work and document the find would reduce the potential impact to a less-than-significant level.

Significance Level:
Less than Significant 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:
The project will contribute to impacts related to construction air quality, biological resources, cultural resources, and geology and soils (paleontological resources). However, most impacts would be short-term associated with construction. In addition, County standards and mitigation measures have been included that would ensure that the project's cumulative contributions would not be considerable.

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:
Construction and operation of the project as proposed will not cause environmental effects that would significantly directly or indirectly impact human beings. Proposed project operations have the potential to cause significant adverse impacts. However, all potential impacts and adverse effects on human beings (resulting from air quality, noise, and traffic) were analyzed and would be less than significant.

Significance Level:
Less than Significant Impact

References

Alquist-Priolo Special Studies Zones; State of California; 1983. http://www.conservation.ca.gov/cgs/rghm/ap/Pages/official_release.aspx

Association of Bay Area Governments (https://abag.ca.gov/our-work/resilience)

BAAQMD CEQA Guidelines, Bay Area Air Quality Management District, California Air Resources Board (CARB), April 1999 (http://www.arb.ca.gov/)

California Agricultural Land Evaluation and Site Assessment Model (LESAM),1997

California Building Code (https://www.dgs.ca.gov/BSC/Codes)

California Department of Fish and Wildlife (https://wildlife.ca.gov)

California Department of Health Services Radon Database (https://www.cdph.ca.gov/Programs/CEH/DRSEM/Pages/EMB/Radon/Radon.aspx)

California Department of Transportation (https://dot.ca.gov)

California Division of Mines and Geology, Geology for Planning in Sonoma County, Special Report 120 (https://ngmdb.usgs.gov/Prodesc/proddesc_321.htm)

California Environmental Quality Act (https://wildlife.ca.gov/Conservation/Environmental-Review/CEQA#:~:text=The%20California%20Environmental%20Quality%20Act,declaration%2C%20or%20environmental%20impact%20report)

California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California, Prepared for California Department of Transportation, California Department of Fish and Game, and Federal Highways Administration, W.D. Spencer et-al (2010)

California Geologic Survey map of Santa Rosa 7.5 Minute Quadrangle (https://www.conservation.ca.gov/cgs/rgm/preliminary)

California Native American Heritage Commission (https://nahc.ca.gov)

California Natural Diversity Database, California Department of Fish & Game. (https://wildlife.ca.gov/Data/CNDDB)

California Register of Historic Resources (https://ohp.parks.ca.gov/?page_id=21238#:~:text=Criteria%20for%20Designation,national%20histor

y%20(Criterion%202)

California State Health and Safety Code (https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=HSC&tocTitle=+Health+and+Safety+Code+-+HSC)

City of Santa Rosa and County of Sonoma Storm Water Low Impact Development Technical Design Manual (https://www.srcity.org/1255/Low-Impact-Development)

Envirostar (https://www.envirostor.dtsc.ca.gov/public/)

Information for Planning and Conversation, United States Fish and Wildlife Service (https://ipac.ecosphere.fws.gov)

Managing Asbestos In Place A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials, United States Environmental Protection Agency, July 1990 (https://www.wbdg.org/ffc/epa/criteria/epa_20t2003)

PRMD, Sonoma County General Plan 2020 (as amended), September 23, 2008. (https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/Organization-and-Overview/)

Regional Climate Protection Authority (https://rcpa.ca.gov)

Sonoma County Climate Change Action Resolution (https://permitsonoma.org/longrangeplans/adoptedlong-rangeplans/climatechangeactionresolution)

Sonoma County Code (https://library.municode.com/ca/sonoma_county/codes/code_of_ordinances?nodeId=SONOMA_CO_CALIFORNIAMUCO)

Sonoma County Important Farmland Map, California Department of Conservation Division of Land Resource Protection Farmland Mapping and Monitoring Program, 2018

Sonoma County Onsite Wastewater Treatment System Manual (https://permitsonoma.org/divisions/engineeringandconstruction/wellandsepticsystems/septicsystems/owtsmanual)

Sonoma County Permit and Resource Management Department (https://permitsonoma.org)
Sonoma County Flood Management Design Manual (https://www.sonomawater.org/fmdm)
Sonoma County Aggregate Resources Management Plan (https://permitsonoma.org/longrangeplans/adoptedlong-rangeplans/aggregateresourcemanagement)

Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, 2018 (https://opr.ca.gov/ceqa/sb-743/)

United States Fish and Wildlife Service (https://www.fws.gov)

Technical Appendices

Appendix A. Proposed plans
Appendix B Biological Assessment prepared by Charles A. Paterson, June 21, 2021, and Update August 16, 2024
Appendix C. Initial Storm Water Low Impact Submittal (SWLID) for Frito Lay Warehouse, prepared by Brelje & Race Consulting Engineers, February 5, 2025, and Initial Storm Water Low Impact Submittal (SWLID) for Aviation Warehouse, prepared by

Brelje & Race Consulting Engineers, November 19, 2024
Appendix D Transportation Impact Study, Prepared by W-Trans, September 15, 2025