ENVIRONMENTAL REVIEW

PURSUANT TO CALIFORNIA PUBLIC RESOURCES CODE
CEQA GUIDELINES SECTION 15183

State Route 116 and West Cotati Avenue Intersection Safety Improvements Project

LEAD AGENCY:

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

CONTACT:

CRAIG SCOTT
PUBLIC WORKS DIRECTOR/CITY ENGINEER

PREPARED BY

METROPOLITAN PLANNING GROUP

OCTOBER 2026

M-GROUP

[PAGE INTENTIONALLY LEFT BLANK]

WEST COTATI AVENUE RE-ALIGNMENT

Project Title:	State Route 116 and West Cotati Avenue Intersection Safety Improvements Project
Lead Agency:	City of Cotati: Community Development Department 201 West Sierra Avenue Cotati, CA 94931
Contact Person:	Craig Scott Public Works Director/City Engineer 707 665-3620
Project Location:	Approximately 1,900 linear feet along State Route 116/Gravenstein Highway between Redwood Drive and 500 feet west of Alder Avenue and West Cotati Avenue between Gillman Road and Highway 116 in the City of Cotati, Sonoma County, California. APNs: 144-050-004, 144-050-005, 144-050-009, 046-286-018, 046-286-019, 144-100-ROW, 144-110-ROW, 999-999-ROW
Project Sponsor(s):	City of Cotati 201 West Sierra Avenue Cotati, CA 94931
Property Owner(s):	W. Cotati Avenue ROW, SR-116 ROW and 144-050-004 City of Cotati 201 West Sierra Avenue Cotati, CA 94931 144-050-005 JBP Investments Properties Inc. 170 Hegenberger Loop Oakland CA 94621 046-286-018 and -019 Cotati Commons Marketplace LLC PO Box 678 Vestal NY 13851 144-050-009 Diamond Boulevard LLC 855 Lakeville St. St 200 Petaluma, CA 94952
General Plan Designation:	SR 116 and W. Cotati Ave. Right of Ways and General Commercial
Zoning:	SR 116 and W. Cotati Ave. Right of Ways and Commercial General – Gravenstein Corridor
Description of Project:	The Project proposes improvements to State Route 116 Gravenstein Highway (SR 116) to provide road safety and traffic management including bike and pedestrian facilities. The Project includes the realignment of West Cotati Avenue, a roundabout with a new north leg providing access to properties to the north, and a new south leg, that will accommodate realignment of W.

	Cotati Ave., construction of a Class 1 bike and pedestrian path, associated pedestrian/bike safety upgrades, and lighting, landscaping, drainage improvements.
Surrounding land uses and setting; briefly describe the Project's surroundings:	The proposed Project along SR-116 is surrounded by parcels zoned for commercial uses. Existing commercial activities include building supply stores, a cannabis dispensary, retail and office land use and restaurants. Additionally, the southern extent of the Project along West Cotati Ave. is adjacent to residential development. Three mixed use residential projects are approved on the adjacent parcels to the north of the Project. The Cotati Village Community Two would construct 126 residential units and the Redwood Row project would construct 168 residential units, and the Cotati Village Community One Project would construct 177 units.
Other public agencies whose approval is required:	California Department of Transportation Sonoma Water (formerly Sonoma County Water Agency) Regional Water Quality Control Board U.S. Fish and Wildlife Service California Department of Fish and Wildlife Service
California Native American tribes traditionally and culturally affiliated with the Project area that have requested consultation:	The City of Cotati notified California Native American Tribes in accordance with Public Resources Code §21080.3.1. Notice was sent to Lytton Rancheria and the Federated Indians of Graton Rancheria by email and physical mailer on July 20, 2023. Additional information was requested and sent to Lytton Rancheria and the Federated Indians of Graton Rancheria. There were no requests for consultation.

WEST COTATI AVENUE/HIGHWAY 116 RE-ALIGNMENT

TABLE OF CONTENTS **PAGE**

1. INTRODUCTION 1

1.1. OVERVIEW OF CEQA ANALYSIS 1
1.2. PURPOSE AND SUMMARY OF THIS CEQA DOCUMENT 1

2. PROJECT DESCRIPTION 1

2.1. PROJECT LOCATION 1
2.2. PROJECT NEED AND PURPOSE 2
2.3. PROJECT BACKGROUND 3
2.4. SURROUNDING LAND USES 4
2.5. EXISTING CONDITIONS 6
2.6. GENERAL PLAN AND INFRASTRUCTURE 7
2.7. PROJECT DESCRIPTION 7

3. RELEVANT CITY PLANNING DOCUMENTS 18

4. APPLICABLE CEQA PROVISIONS AND FINDINGS 21

4.1. GENERAL PLAN/COMMUNITY PLAN EXEMPTION (CEQA GUIDELINES SECTION 15183) 22
4.2. APPLICABILITY OF THE PROJECT TO CEQA GUIDELINES SECTION 15183 22
4.3. CEQA DETERMINATION AND SUMMARY OF FINDINGS 24

5. EVALUATION OF ENVIRONMENTAL EFFECTS 26

5.1. AESTHETICS 28
5.2. AGRICULTURAL AND FORESTRY RESOURCES 32
5.3. AIR QUALITY 35
5.4. BIOLOGICAL RESOURCES 44
5.5. CULTURAL RESOURCES 55
5.6. ENERGY 60
5.7. GEOLOGY AND SOILS 63
5.8. GREENHOUSE GAS EMISSIONS 68
5.9. HAZARDS/HAZARDOUS MATERIALS 73
5.10. HYDROLOGY AND WATER QUALITY 80
5.11. LAND USE AND PLANNING 86
5.12. MINERAL RESOURCES 90
5.13. NOISE 91
5.14. POPULATION AND HOUSING 96
5.15. PUBLIC SERVICES 99
5.16. RECREATION 101
5.17. TRANSPORTATION 103
5.18. TRIBAL CULTURAL RESOURCES 112
5.19. UTILITIES AND SERVICE SYSTEMS 115
5.20. WILDFIRE 118
5.21. MANDATORY FINDINGS OF SIGNIFICANCE 121

6. REFERENCE DOCUMENTS 124

6.1. TECHNICAL APPENDICES 124

6.2. OTHER DOCUMENTS REFERENCED 124

7. ENVIRONMENTAL CONDITIONS OF APPROVAL 126

FIGURES

FIGURE 1: REGIONAL LOCATION 12
FIGURE 2: PROJECT VICINITY 13
FIGURE 3: GENERAL PLAN LAND USE 14
FIGURE 4: ZONING 15
FIGURE 5: SITE INTERSECTION DESIGN 16
FIGURE 6: SCHOOLS WITHIN ¼ MILE OF THE W. COTATI/SR-116 REALIGNMENT PROJECT 77

TABLES

TABLE 1: AIR QUALITY SIGNIFICANCE THRESHOLDS 39
TABLE 2: CONSTRUCTION PERIOD EMISSIONS 40
TABLE 3: GHG EMISSION FORECASTS 69
TABLE 4: INTERSECTION LEVEL OF SERVICE 107

ACRONYMS AND ABBREVIATIONS

APN	Assessor Parcel Numbers
BAAD	Bay Area Air District
BMP	Best Management Practice
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CRHR	California Register of Historical Resources
CRPUSD	Cotati-Rohnert Park Unified School District
CTS	California Tiger Salamander
dBA	A-weighted Decibel
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substance Control
EIR	Environmental Impact Report
GHG	Greenhouse Gas
gpd	gallons per day
LID	Low Impact Development
LWWTP	Laguna Wastewater Treatment Plant
MBTA	Migratory Bird Treaty Act
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OEHHA	California Office of Environmental Health Hazards Assessment
PPV	Peak Particle Velocity
PRC	Public Resources Code
RCPA	Regional Climate Protection Agency
ROG	Reactive Organic Gas
RWQCB	Regional Water Quality Control Board
SCH	State Clearinghouse
SRPCS	Santa Rosa Plain Conservation Strategy
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
$\mu g/m^3$	Micrograms Per Cubic Meter

[**PAGE INTENTIONALLY LEFT BLANK**]

1. INTRODUCTION

This California Environmental Quality Act (CEQA) Analysis has been prepared in accordance with CEQA Guidelines Section 15183 and evaluates consistencies with the City's certified General Plan Environmental Impact Report (EIR) to identify any new or more significant impacts from the Project.

1.1. OVERVIEW OF CEQA ANALYSIS

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

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

1.2. PURPOSE AND SUMMARY OF THIS CEQA DOCUMENT

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

2. PROJECT DESCRIPTION

2.1. PROJECT LOCATION

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

Sonoma County in a low-lying topographical area known as the Santa Rosa Plain. The city has a population of approximately 7,584[1] within approximately 1,217 acres of City-incorporated land.

The Project site includes a section of State Route 116 West Gravenstein Highway (SR-116) and an intersection portion of West Cotati Avenue in the City of Cotati, in the County of Sonoma (Figure 1). Specifically, the Project site is located along SR 116 between Redwood Drive and approximately 500 feet west of Alder Avenue within the public right-of-way and frontage as well as West Cotati Avenue from the intersection with SR-116 to the intersection with Gillman Ranch Road. The Project site is approximately 350 feet west of the Highway 101 south on/off ramp.

The Project site is comprised of the existing roadways and public right of way along approximately 1,400 linear feet of State Highway CA 116, City-owned parcel 144-050-004, a portion of the neighboring parcel 144-050-005 which has been dedicated to the City through a land swap, and an approximately 19-foot-wide strip along SR-116 on parcels 144-050-009, 046-286-018, and 046-286-019 (Figure 2).

2.2. PROJECT NEED AND PURPOSE

Project Purpose

The purpose of the proposed project is to:

- **Realize General Plan Goals:** Implement General Plan Actions by installing a modern intersection control (roundabout) that provides high-quality multimodal infrastructure improvements.
- **Enhance Operational Efficiency:** Improve traffic conditions for all roadway users, including vehicles, trucks, bicyclists and pedestrians, through modernized design features, and reduce idling through continuous-flow traffic control measures.
- **Support Multi-Modal Mobility:** Provide integrated, low-stress crossings for pedestrians and bicyclists to enhance the user experience and safety for all modes of travel.
- **Reduce Conflict Points:** Modernize the intersection geometry to naturally manage speeds and simplify driver decision-making through a reduced-conflict design.
- **Accommodate Planned Future Growth:** Modify the SR-116 corridor to effectively serve the planned local and regional growth with right-sized infrastructure

Project Need

The proposed project is necessitated by the following factors at the intersection of SR-116 and West Cotati Avenue:

- **Policy Alignment:** Current transportation infrastructure requires modernization to achieve the multimodal goals and implement transportation measures outlined in the General Plan.
- **Multimodal Improvements:** There is a need for enhanced transportation infrastructure to better support pedestrian and bicycle connectivity within the corridor by installing dedicated facilities.
- **Operational Demand:** Existing traffic control measures and intersection geometry do not optimally accommodate current traffic volumes or the anticipated volumes associated with planned local and regional growth.

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

- **Design Standards:** The project area requires updates to align with current design best practices for integrated, multimodal transportation networks.

2.3. PROJECT BACKGROUND

The proposed modification to the existing intersection of W. Cotati Ave and SR-116 is identified as a priority project based on the City's collision history and need for improved multi-modal infrastructure and connectivity on the west side of Highway 101. The existing intersection is unsignalized and has an angle that limits sight distances, creating operational challenges. The Local Road Safety Plan lists the need for safety improvements at this intersection based on its high collision history and a cost benefit analysis was performed for intersection improvements. Additionally, the 2024 Active Transportation Plan identifies SR-116 and West Cotati Ave. as key corridors needing improvements to facilitate north/south connectivity and access into the downtown core. The Project rights-of-way are within the urban growth boundary and adjacent parcels are designated for residential, mixed-use, and commercial development in both the General Plan Map (**Figure 3**) and Zoning Map (**Figure 4**).

General Plan Goal CI 1 is to *create a circulation network that reinforces the desired land use pattern for Cotati and provides for the safe and efficient movement of people and goods to all parts of the City.* Under this goal, Policy CI 1 is to *ensure that the City's circulation network is maintained and improved over time to support buildout of the General Plan in a manner that is consistent with the City's Circulation Diagram Figure 2.1.* Figure 2.1 identifies a new traffic signal at W. Cotati Avenue and SR-116. Further, General Plan Policy CI 1.2 is to *ensure that the City's circulation network is a well-connected system of streets, roads, highways, sidewalk, and bicycle/pedestrian paths that effectively accommodates vehicular and non-vehicular traffic in a manner that considers the context of surrounding land uses and the needs of all roadway users*.

In December of 2022 the City of Cotati engaged consultant Fehr and Peers to study the intersection of West Cotati Ave. and SR-116 and create a design that would prioritize local roadway safety as well as pedestrian and bicycle connectivity. Three potential realignments for West Cotati Avenue were studied: a 90º intersection with SR-116 offset 55' from what would be potential future roadway connection to the north; a less than 90º connection to SR-116 with an angled connection and 37' offset to a potential future roadway to the north, and a 90º intersection with SR-116 directly across from the potential future roadway to the north and requiring the acquisition of additional private land. Three designs were prepared.

Two public workshops with the City of Cotati Planning Commission were held for the Project. On June 19, 2023, Fehr and Peers presented the Project to the Cotati Planning Commission, acting in their capacity as the city's Bicycle and Pedestrian Advisory Committee at a noticed public meeting. This presentation was received by the Commission and interested community members, each of whom provided input on the project scope and conceptual design. Direction received in this meeting and subsequently from city staff allowed the consultant to proceed with the 35% engineered plans which were completed on April 21, 2024. The City Council approved the signalized intersection project on September 10, 2024.

At the time of the project design and approval, the City of Cotati's Municipal Code prohibited traffic circles. However, on November 5, 2024, residents of Cotati voted on and passed ballot Measure S in the General Municipal Election, which repealed a prohibition on roundabouts and traffic circles in the city (Chapter 11.11 of the City's municipal Code). On December 10, 2024, the City adopted Ordinance No. 933 which repealed the prohibition and permits roundabouts and traffic circles in the city.

Following project approvals, the City initiated the Caltrans Design, Engineering, Evaluation and Report process. Through this process, Caltrans requested that the City analyze the feasibility of an alternative design using a roundabout.

On November 21, 2025, Fehr & Peers prepared an Intersection Safety and Operational Assessment Process memo (ISOAP) in accordance with Caltrans' Intersection Safety and Operational Process Guide (September 10, 2024). The purpose of the ISOAP memo was to document multiple options for improving mobility, connectivity, safety, and access at the intersection of SR 116 and the proposed realignment of West Cotati Avenue. Per Caltrans' guide, the project must consider several strategies, treatments, configurations, and countermeasures for the proposed intersection realignment, and must incorporate Caltrans' Safe System Approach to define the optimal intersection configuration.

The ISOAP initially considered ten intersection options, however only three were studied in the ISOAP Stage 1 evaluation due to the limited size of the project site. The three designs studied included a one-lane roundabout, a traffic signal, and a two-way stop control (existing control strategy). During the City's planning process, a one-lane roundabout was found to be the most feasible and preferred alternative. The Caltrans Safety Performance for Intersection Control Evaluation (SPICE) tool analyzed safety at the three different types of intersection controls, which projected that a one-lane roundabout would have the lowest number of fatal and injury-inducing collisions.

Following the conclusion of the ISOAP Stage 1, on January 9, 2026, 35% engineered plans were revised to reflect the roundabout design.

2.4. SURROUNDING LAND USES

Surrounding land use projects in the vicinity of the proposed roadway improvements include the following:

- The South Sonoma Business Park (SSBP) - The entirety of the SSBP site (~30 acres), including the recently approved Cotati Village project, was mass graded circa 2002. To date the SSBP project site has been developed with a Lowes Home Improvement Center and the existing Cotati Commons residences. The SSBP Environmental Impact Report (EIR) was certified by the City of Cotati (SCH #2000052045) on June 13, 2001, and evaluated impacts associated with 590,000 square feet of office and 60,000 square feet retail development on ~30 acres. The SSBP EIR also evaluated the improvements to State Route 116 to five lanes (2 lanes both east and west and 1 turning lane) and a signalized intersection at Alder Avenue. Alder Avenue, Helman Lane, and Redwood Drive were also analyzed for widening. In addition, the 2001 SSBP EIR included the re-alignment of West Cotati Avenue to align with the primary site access and to create a standard four-legged perpendicular intersection. The City of Cotati certified the SSBP EIR and approved the Orchard Plan Alternative, which included 582,000 square feet of mixed-use office/retail commercial development and 50 housing units.

  The first addendum to the 2001 SSBP EIR was approved by City Council on December 22, 2003, to accommodate the Orchard Alternative plan. Addendum No. 1 renamed the Orchard Plan Alternative as "Cotati Commons," and considered the development of 259,000 square feet of retail (referred to as Cotati Commons Marketplace), 42 residential units, and 39,750 square feet of office space (referred to as Cotati Commons). The revised project analyzed in Addendum No. 1 maintained the same number of access points as in the Orchard Plan Alternative but adjusted the locations to fit the modified site plan. The primary entry from SR 116 to the retail portion of the site would now be a roundabout. In addition, six more points

of access were proposed: two on Alder Avenue, one on Redwood Drive, and three on Helman Lane. As evaluated in the 2001 SSBP EIR, SR 116 would be widened. However, there would no longer be a signalized intersection at Alder Avenue.

Following approvals of the Orchard Alternative, the residential component of the Cotati Commons (46 dwelling units) was constructed in 2004. Public improvements to Alder Avenue were also constructed in 2004. Lowe's Home Improvement Store (165,382 square feet of retail), all within the Cotati Commons Marketplace, were constructed in 2006.

The second addendum to the 2001 SSBP EIR was prepared in November 2006 and was approved by City Council on June 13, 2007 (Resolution #07-24). Under Addendum No. 2, the number of residential units was reduced from 42 to 40, with 15 units becoming live-work units, and office space was reduced from 39,750 square feet to 38,000 square feet. Addendum No. 2 evaluated the SR 116 Improvements within current and future Caltrans right-of-way. Addendum No. 2 also evaluated the frontage improvements that were completely or partially outside of Caltrans right-of-way including:

  - Removal of the direct entrance to Cotati Commons Village from SR 116
  - Improvement of the north leg of the Alder Avenue intersection
  - Realignment of driveways for the adjacent Shamrock Materials and Minatta Trucking Company parcels so they are combined and aligned to form the south leg of the SR 116/Alder Avenue intersection
  - Construction of new public sidewalks along the northern edge of SR 116 from the Redwood Drive intersection to Alder Avenue, including handicap ramps, and
  - Install pedestrian crosswalks north of SR 116 across the primary entrance driveway and Alder Avenue

- On November 12, 2019, the City approved an Assisted Living/Memory Care Development on parcels 144-040-011 and 144-040-021 including a 4,000 square foot cannabis dispensary. The Jane Dispensary was constructed on parcel 144-040-021 along the SR-116 frontage and began operating on October 31, 2022. Adjacent uses include Acre Pizza and an axillary office use. The applicant decided not to proceed with the Assisted Living/Memory Care component of the project and the entitlements have since expired. A new project titled Cotati Village 2 proposed 126 multi-family units and 2,000 square feet of commercial space on the remainder of this site and was approved by City Council on August 28, 2024.

- An SB 330 application to create a 170-unit multi-family housing and mixed use development also named "Cotati Village" and at APN 144-050-009 was approved on February 27, 2024. The Project includes a 30-foot-wide build to setback from the SR-116 right-of-way and would utilize the newly configured roundabout at the W. Cotati Avenue intersection as the primary access point. The project is not yet under construction.

- A 168-unit townhome, apartment and mixed-use development at APN 046-286-018 and -019, known as Redwood Row, just east of the Cotati Village site was approved on May 13, 2025. This project includes a 25-foot wide "build to" set back from the SR-116 right-of-way and would

utilize the new roundabout at the W. Cotati Avenue intersection as the primary access point. The project is not yet under construction.

2.5. EXISTING CONDITIONS

The Project site includes an existing two-lane highway, State Route 116 Gravenstein Highway (SR-116), and an existing local arterial, W. Cotati Avenue and ruderal grasslands. Both roadways have two-lanes with one 12-foot travel lane in each direction. SR-116 has a striped centerline and an 8-9 foot partially paved shoulder. Approximately 275 feet west of Redwood Drive, SR-116 widens into two through-traffic lanes and a left-hand turn lane at the intersection of Redwood Drive. There is a 100-foot right-hand merge lane on westbound SR-116 starting at the intersection of Redwood Drive. The intersection of West Cotati Avenue with SR-116 is currently controlled by a side-stop street at a 30 degree angle. There are no designated bike or pedestrian facilities on either side of SR-116.

State Route 116 is a Caltrans-owned facility and therefore is designed to comply with the Highway Design Manual (HDM). It is classified as a Conventional Highway (HDM Chapter 60, Section 62.3) and subclassified as an urban arterial based on the existing and proposed highway context (HDM Chapter 100, Index 101.1). These classifications inform design decisions for roadway access and design speeds. Roadway access is at-grade and accommodates local access to adjacent land uses and roadways. The design speed for the roadway is between 40-60 mph (HDM Table 101.2).

Currently, SR-116 is two lanes and has a posted speed limit of 45 mph through the Project area. The speed limit is reduced to 35 mph for eastbound traffic on approach to the intersection with Redwood Drive. East of the Project area, SR-116 is four lanes and has a posted speed of 35 mph as it enters a more densely developed area. West of the Project area it is two lanes and has a posted speed of 45 mph with driveway access to adjacent properties and local roadway access.

The existing W. Cotati Avenue is a two-lane road with a partial sidewalk that extends approximately 100 feet west from its intersection with Gillman Road. There are no pedestrian facilities along either side of the existing W. Cotati Avenue. An existing striped bike lane exists from the intersection of Gillman Road for 100 feet and then is merged with the existing vehicle traffic, which is indicated as a Class 3 bicycle route through “sharrow” pavement marking.

Vegetation and Wetlands

Parcels 114-050-004 and 144-005-005, where the new alignment of W. Cotati Avenue will intersect with SR-116 are currently vacant parcels. The parcels have existing vegetation and approximately 8,255 square feet of seasonal wetlands and 711 feet of linear wetlands.

A 368-foot-long linear wetland is located within the public right of way along the southern side of West Cotati Avenue from the end of the existing sidewalk to the intersection with SR-116.

On the northside of SR-116, adjacent parcels 144-050-009, 046-286-018, 046-286-019 are currently undeveloped. The strip of land proposed for dedication from these parcels includes approximately 1,661 square feet of isolated wetlands along SR-116. The mixed-use development on 144-050-009 has been approved and the mixed-use development on parcels 046-286-018 and 046-286-019 is approved but not yet under construction.

The majority of the vegetation on the Project site is dominated by a ruderal herbaceous plant community. Ruderal (weedy) communities are assemblages of plants that thrive in waste areas, roadsides and other sites that have been disturbed by human activity. Typically, hardpacked soils of

roadsides, parking lots, industrial areas and construction sites support communities of ruderal species. Trees are located on the site and include a variety of species including California Black Oak and Valley Oak, and Eucalyptus. No special status plant species have been observed on the site.

Environmental Conditions

The likely presence of aerially deposited lead (ADL) associated with automobile exhaust along Highway 116 represents a current Recognized Environmental Condition for the Subject Property. Several Completed-Case Closed LUST (petroleum hydrocarbon releases) sites are near the Subject Property boundary. Based on their regulatory status (Completed-Case Closed), location relative to the expected direction of groundwater flow (i.e., cross-gradient of the Subject Property), they are unlikely to pose significant environmental risk.

2.6. GENERAL PLAN AND INFRASTRUCTURE

The majority of the Project area is an existing public roadway and associated right of way and thus does not in and of itself have a General Plan Land Use or Zoning Designation. However, the surrounding land uses and zoning provide important context for the Project. Adjacent parcels have General Plan land use designation General Commercial along SR-116 and Rural Residential to the south of the W. Cotati Ave. (Figure 3). The surrounding land use designations are General Commercial to the north, east, and west of the Project, and Low-Density Residential south of the West Cotati Avenue Realignment. The two parcels, 114-050-004 and 144-005-005, where W. Cotati Ave. will be realigned, are designated as General Commercial.

The City's General Plan is intended to direct future growth in the City of Cotati. The Circulation Element includes goals, policies, and programs that plan for the future transportation to ensure that all modes of transportation can accommodate the land use designations proposed in the General Plan. Circulation Element Actions CI 1b through CI 1e identify the transportation improvement projects that would support the proposed growth of the City of Cotati. Actions CI 1b and 1c, specifically identify the following projects which encompass the Project site:

- Construct a minor realignment of West Cotati Avenue to intersect Gravenstein Highway at an improved angle and install four-way intersection control (such as a roundabout) at the intersection.
- Reconstruct Gravenstein Highway between Madrone Avenue and Redwood Drive to include sidewalks, bicycle lanes, two vehicle Travel lanes in each direction, and left Turn pockets.

The City of Cotati Land Use Code implements the General Plan. Several different districts are identified in the Zoning Ordinance that are intended to, among other things, provide for a wide range of uses and implement the City's vision to conserve open space and resources. The Project will take place on existing paved roads and existing and planned right of way. Land along the northside of the Project that will be dedicated and the parcels that will be used for the realignment of West Cotati Avenue are zoned General Commercial - Gravenstein Corridor, and the surrounding land uses to the north, east, and west of the Project are designated General Commercial – Gravenstein Corridor and the area south of the Project on West Cotati is zoned Residential Very Low Density and within the areas identified for future road expansion in the City's General Plan (Figure 4).

2.7. PROJECT DESCRIPTION

The Project will decommission an existing section of West Cotati Ave. and realign the street and construct a controlled intersection with SR 116 with a roundabout. A new road will extend northward

from the roundabout to provide access to approved residential projects. A 10-foot sidewalk, to align with City Commercial Street Standards, and striped bicycle lane would be installed along West Cotati Ave. extending throughout the new roundabout to the existing sidewalk and bike lane at Gillman Ranch Road (Figure 5). High-visibility crosswalks would be installed on all four legs of the roundabout, in addition to four new paved medians for pedestrian safety. The paved medians will create a chicane to calm traffic as it enters and exits the roundabout. Other Hwy 116 improvements include striped bicycle lanes, ADA accessible sidewalks and curb cuts, landscaping, and associated striping for safety.

The Project will modify State Route 116/Gravenstein Highway (SR-116) from the intersection of Redwood Drive to approximately 350 feet west of Alder Avenue and will realign West Cotati Avenue through a roundabout as well as install pedestrian and bicycle facilities.

West of the proposed roundabout at SR-116 and West Cotati Ave, the Project would construct a single 12-foot eastbound lane, which would also include a striped bike lane within the 8-foot shoulder, extending on both sides of the new roundabout to Redwood Drive. The eastbound traffic would continue east of the roundabout in one 12-foot lane with an 8-foot shoulder. The westbound and eastbound traffic would be separated by a concrete raised median varying in width.

SR 116 will be widened to accommodate a 6-foot bicycle lane in each direction. The bicycle lanes will have a two-foot buffer between the vehicle travel lanes and the bicycle lanes. The bicycle lane and buffer will be striped within the 8-foot outside shoulder. At the roundabout, the two-foot buffers will taper into a surface-mounted channelizer with 10-foot on center spacing. A paved eight-foot-wide outside shoulder will be constructed on the westbound side of SR 116 from the intersection at Alder Avenue to the roundabout. A 10-foot-wide shared use pathway, with 2-foot shoulders, will extend from Alder Avenue along the north side of SR 116 to approximately 200 feet west of Redwood Drive where it will connect with the existing sidewalk.

Landscaping, Lighting, and Fencing

The Project includes the addition of new streetlights as required for safety and compliance with the City's municipal code and Caltrans design standards and regulations. Lighting will be addressed in the final design and engineering plans and will be designed in compliance with applicable Caltrans Design Standards, consistent with City policies and objectives, and in compliance with the City of Cotati Municipal Code. Splitter islands and medians will be hardscaped and the roundabout center island will be planted. Outside planter strips will also have landscaping. Landscaping will be addressed in the final design and engineering plans and will be designed in compliance with applicable Caltrans Design Standards, consistent with City policies and objectives, and in compliance with the City of Cotati Municipal Code.

Storm Drainage Infrastructure

The Project proposes to maintain existing flow patterns within the Project limits. The existing storm drainage infrastructure is limited to roadside ditches, short segments of culverts under driveways, and a few existing drainage inlets within 300-feet of Redwood Drive. The Project proposes to maintain the same crowned grading conditions along SR-116, with flow concentrating at the outside edge of pavement, running into the roadside ditches.

West Cotati Ave will be graded to allow for run-off to concentrate along the proposed curb and gutter, and to outlet in a similar manner as existing.

Site Preparation and Construction

For the purpose of this analysis, it is assumed that site preparation and construction would occur within an approximately 15-18 month construction period. Site preparation would initiate with the removal of vegetation and trees, decommissioning of approximately 350 linear feet of West Cotati Avenue, grading and paving of the new roadway as well as installation of the new sidewalks and pathways.

Revegetation of the Project would include seeding and planting the roundabout center island, and other landscape strips with native-drought tolerant plants, and tree placement in compliance with Municipal Code Chapter 17.54.

Utilities

Several utilities run overhead or underground within the public right of way throughout the Project site. These include:

- Water – City of Cotati
- Natural Gas – Pacific Gas & Electric
- Electricity – Pacific Gas & Electric
- Sewer – City of Cotati
- Telecommunications – AT&T
- Telecommunications – Comcast

Construction of the Project may require the relocation of some electrical poles, a fire hydrant, and existing light poles, but will not require expansion or offsite improvements outside of the Project area.

Required Discretionary Actions

The City can use judgement in deciding whether and how to carry out the Project and as such, it is a discretionary action and thus considered a project under CEQA.

Other Public Agency Review

The Project may require the following approvals from agencies other than the City:

- California Department of Transportation – Modification of a state highway and encroachment permit
- Sonoma Water (formerly Sonoma County Water Agency) – For review, approval, and acceptance of the Project's Stormwater Management Plan.
- Regional Water Quality Control Board (Water quality certification, Section 401 of the Clean Water Act)
- U.S. Fish and Wildlife Service - Endangered Species Act Permit
- California Department of Fish and Wildlife Service - California Endangered Species Act permit

California Native American Tribal Consultation

In accordance with Public Resources Code (PRC) Section 21084.2, lead agencies are required to consider Tribal Cultural Resources (TCR) including a site feature, place, cultural landscape, sacred place or object, of cultural value to the tribe and is listed on the California Register of Historic Resources (CRHR) or a local register, or the Lead agency, at its discretion, chooses to treat resources as such. In accordance with PRC Section 21080.3.1(b)(1), the Federated Indians of Graton Rancheria

(FIGR), in a letter dated July 20, 2023**,** stated that its tribe was traditionally and culturally affiliated with a geographic area within the City of Cotati's geographic area of jurisdiction, and requested formal notice of and information on projects for which the City of Cotati serves as a lead agency under CEQA.

In accordance with PRC Section 21080.3.1(d), the City of Cotati provided written formal notification to the FIGR on July 19, 2023, which included a brief description of the Project and its location, the City of Cotati's contact information, and a notification that FIGR has 30 days to request consultation pursuant to this section. The City of Cotati did not receive a response from FIGR requesting consultation under PRC Section 21080.3.1(b)(2).

[PAGE INTENTIONALLY LEFT BLANK]

Figure 1: Regional Location

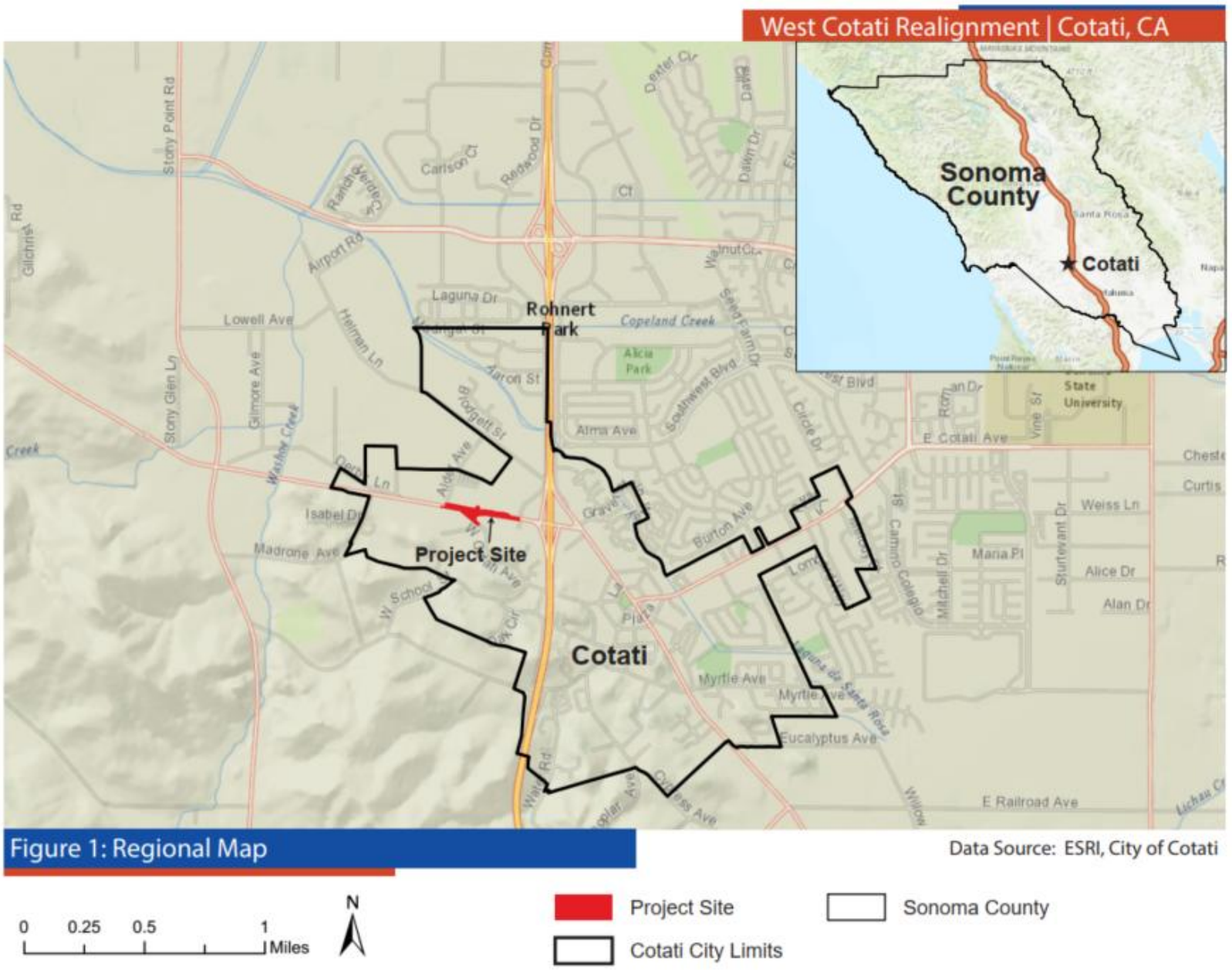


Figure 2: Project Vicinity

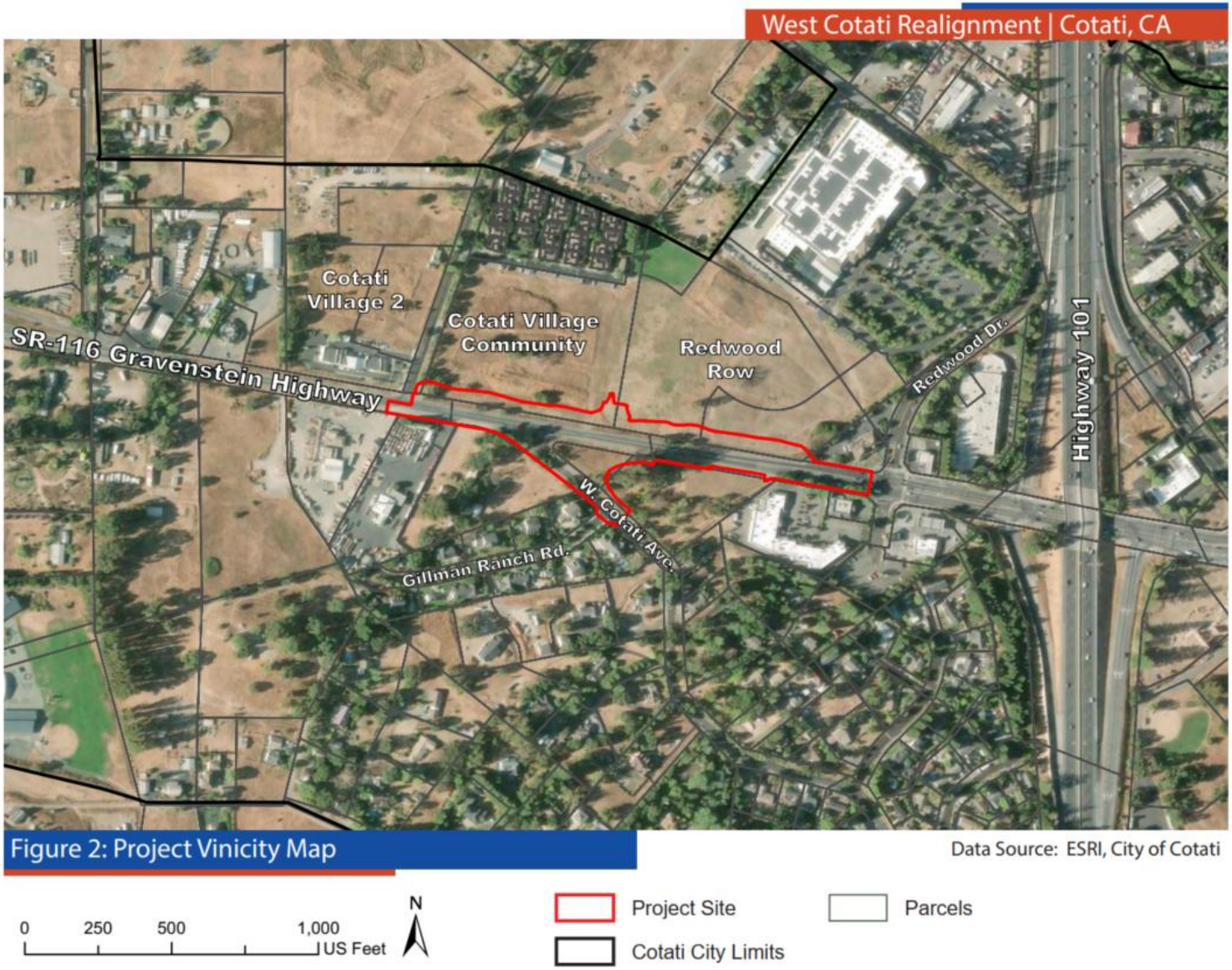


Figure 3: General Plan Land Use

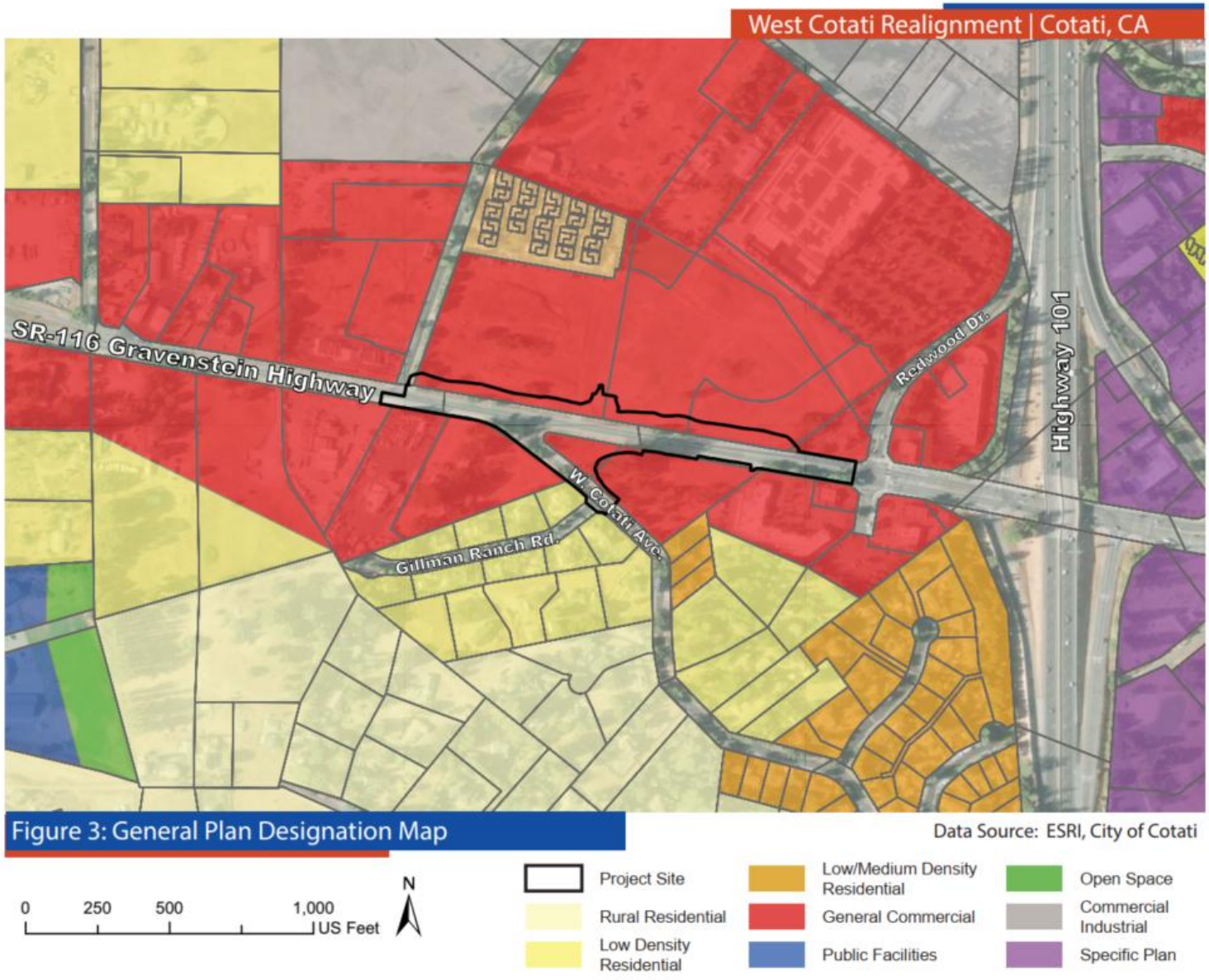


Figure 4: Zoning

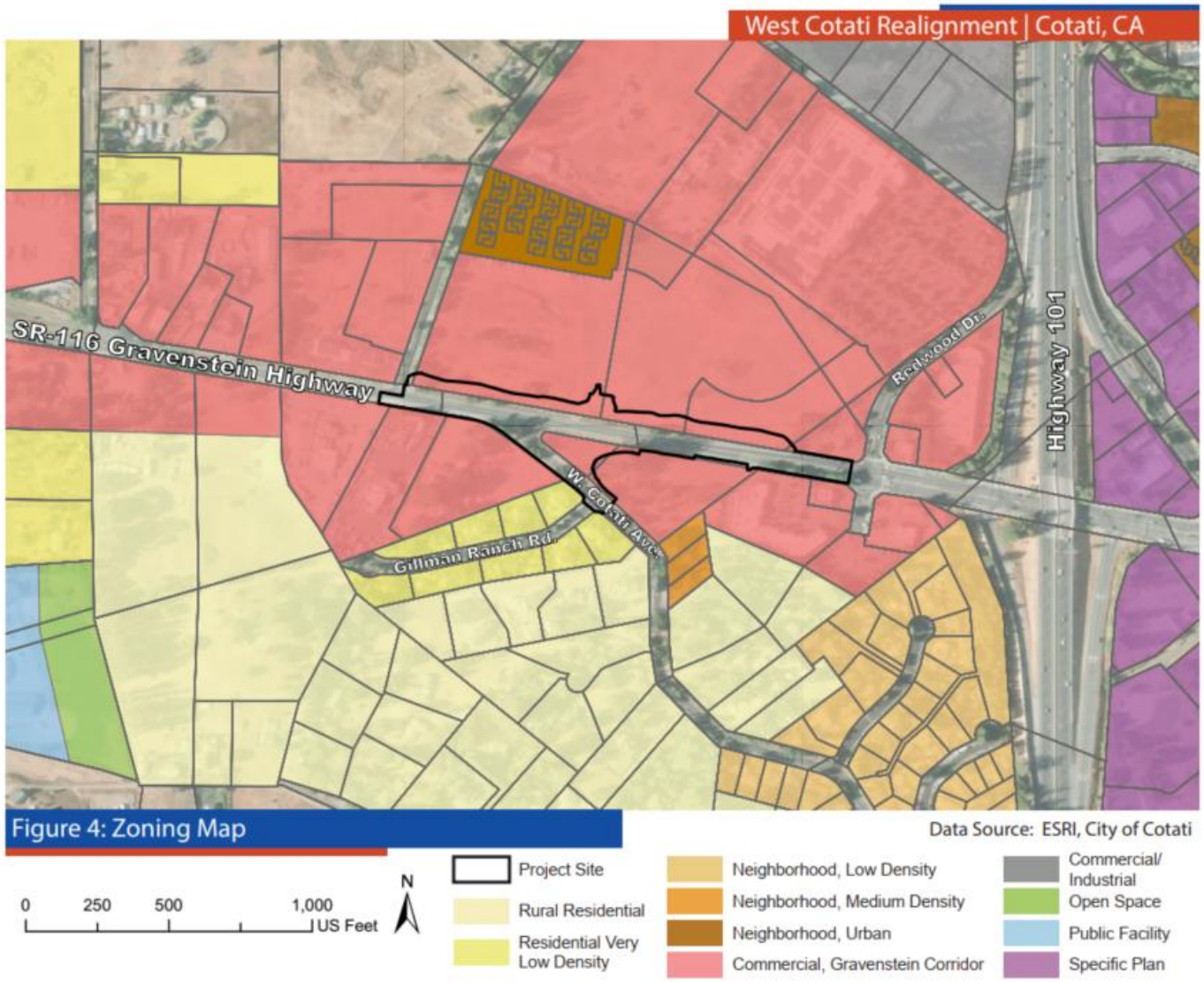
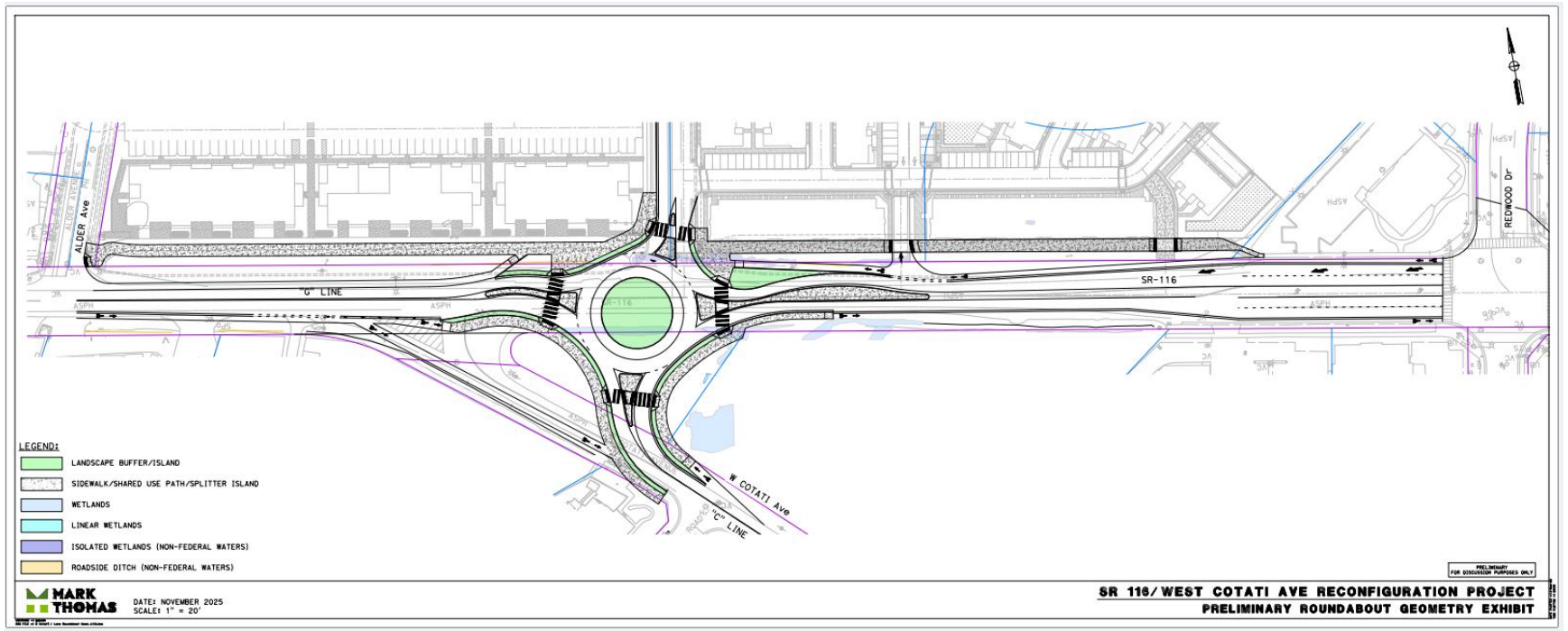


Figure 5: Site Intersection Design



[PAGE INTENTIONALLY LEFT BLANK]

3. RELEVANT CITY PLANNING DOCUMENTS

CEQA Guidelines 15183 limits the environmental review to the General Plan and the General Plan EIR, however the adopted community and countywide plans establish the framework used for the development of the proposed Project. Incorporation by reference is a necessary device for reducing the size of a CEQA document and eliminates the need for the inclusion and repetition of copious technical and other background information into a CEQA document. Of particular relevance are the following documents, all of which are hereby incorporated by reference into this document as if they were published herein. The relevant information and/or analysis that has been incorporated by reference into this environmental review has been summarized. The documents are available for public review at the City of Cotati, 201 West Sierra Avenue, Cotati, CA 94931 and/or online at the following link: https://www.cotaticity.org/220/Citywide-Planning-Documents or as otherwise indicated.

City of Cotati General Plan (2015)

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

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

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

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

City of Cotati General Plan Environmental Impact Report (2013)

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

The General Plan EIR reviewed potentially significant environmental effects resulting from plan implementation and developed measures and policies to mitigate impacts to less-than-significant levels. Nonetheless, significant and unavoidable impacts were determined to occur under the General

Plan. Therefore, the City adopted a statement of overriding considerations, which balance the merits of approving the plan despite the significant environmental effects. The effects identified as significant and unavoidable in the General Plan EIR include:

Aesthetics

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

Noise

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

Traffic

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

Utilities

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

Other

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

The Draft EIR for the Cotati General Plan (SCH No. 2013082037) was prepared in September 2014. The Draft EIR, together with the Response to Comments Document dated November 2014, constitute the Final EIR for the Cotati General Plan. On March 24, 2015, the City of Cotati City Council adopted Resolution 2015-11 certifying the Final EIR for the Cotati General Plan. A copy of the City of Cotati's General Plan EIR is available at the Community Development Department, 201 West Sierra Avenue, Cotati, California 94931, during normal business hours and online at www.cotaticity.org.

Moving Forward 2050: Sonoma County Comprehensive Transportation Plan

Moving Forward 2050, Sonoma County's Comprehensive Transportation Plan (CTP), is a 25-year plan that serves as the vision for transportation throughout Sonoma County, with goals for the

transportation system and the well-being of the communities. Moving Forward 2050 establishes five goals: Deliver a seamless network that allows people to use a variety of transportation types easily, affordably and dependably; Provide safe and well-maintained transportation infrastructure; Implement place-based transportation projects, tailored to urban, suburban, and rural communities that will improve local mobility; Provide zero-emission transportation opportunities that meet diverse community needs, improve health and enhance quality of life.

Projects identified in Moving Forward 2050 relative to Cotati include: updating the US 101 and Railroad Avenue Interchange; widening and rehabilitation of SR 116 between US 101 and Stony Point Road and the addition of signalized intersections, new bike lanes, and new sidewalk to improve the vehicle LOS, improve the safety of 116 for all modes of transportation, and create safe new corridors for pedestrian and bicyclists; Bicycle and pedestrian upgrades (citywide); constructing sidewalks along west Cotati Avenue to close gaps; US 101/SR 116 north bound on-ramp improvements; Multimodal streetscape improvements joining all four legs of La Paza Street around La Plaza Park; widening Old Redwood Highway for safer bike lanes, sidewalks, and center island medians; US 101/West Sierra Avenue south bound off-ramp improvements; and local street pavement rehabilitation from La Plaza to Gravenstein Highway.

Cotati Active Transportation Plan 2024

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

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

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

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

City of Cotati Local Roadway Safety Plan (2021)

The City Council of Cotati adopted the Local Roadway Safety Plan (LRSP) on December 14, 2021. The plan serves as a framework to systematically identify and analyze transportation safety issues, collaborate with partner agencies and stakeholder, and develop a multidisciplinary toolbox of traffic safety countermeasures. It is also a blueprint for addressing traffic safety issues throughout the County across the 4 E's of traffic safety disciplines; Engineering, Education, Enforcement, & Emergency Services. The LRSP is divided into 3 core parts. The first is an assessment of historical collision trends

and patterns. The second is identification of systemic Citywide collision patterns, not at any specific location, with a framework and toolbox for countering those collision patterns. The third is identification of the highest location specific collision patterns, with recommended countermeasures to reduce collisions. The City of Cotati adopted the updated LRSP on December 14, 2021.

Vision Zero Action Plan (2022)

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

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

Climate Action 2020 and Beyond (2016)

On March 27, 2018, the Cotati City Council adopted Resolution 2018-15 reaffirming its intent to reduce GHG emissions as part of a coordinated effort through the Sonoma County Regional Climate Protection Authority. The resolution reaffirmed the City's commitment to the Climate Action 2020 and Beyond Plan that was developed in 2016.

According to the Climate Action 2020 Plan adopted in 2016 and reaffirmed in 2018, the City of Cotati will achieve GHG reduction targets through a combination of state, regional and local measures. At the state level, fuel efficiency standards, Title 24 building standards, low carbon fuel standard, and Renewable Portfolio Standards are estimated to achieve a GHG reduction of 13,710 MTCO2e by 2020. Regional efforts are projected to achieve a GHG reduction of 4,070 MTCO2e through activities carried out by the Regional Climate Protection Authority, Sonoma Water, County of Sonoma Energy Independence Office, Sonoma County Transportation Authority, and Sonoma Clean Power. Locally, the City of Cotati is expected to realize a GHG reduction of 1,550 MTCO2e through implementation of Measure 11-L1 (Senate Bill SB X7-7 – Water Conservation Act of 2009), Measure 2-L4 (Solar in Existing Non-Residential Buildings), and Measure 2-L2 (Solar in Existing Residential Buildings). Additional GHG reducing efforts by the City include purchase and use of 100-percent renewable "evergreen" power from Sonoma Clean Power, purchase and deployment of electric vehicles (EV(s)) for all civic use automobiles in the City's fleet (along the adopted vehicle replacement schedule) and early adoption of the 2024 building code EV charging standards.

4. APPLICABLE CEQA PROVISIONS AND FINDINGS

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

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

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

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

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

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

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

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

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

4.2. Applicability of the Project to CEQA Guidelines Section 15183

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

The Project is identified in the General Plan Circulation Element under Actions CI 1b and 1c and is consistent with the General Plan policies and actions including the following:

- Policy CI 1.1 Ensure that the City's circulation network is maintained and improved over time to support buildout of the General Plan in a manner that is consistent with the City's Circulation Diagram Figure 2.1.
- Policy CI 1.2 Ensure that the City's circulation network is a well-connected system of streets, roads, highways, sidewalks, and bicycle/pedestrian paths that effectively accommodates vehicular and non-vehicular traffic in a manner that considers the context of surrounding land uses and the needs of all roadway users.
- Policy CI 2.11 Establish and maintain bicycle facilities that are consistent with the network depicted in the City's Bicycle and Pedestrian Master Plan.
- Policy CI 2.12 Public road construction projects shall incorporate facilities identified in the Bicycle and Pedestrian Master Plan to the greatest extent feasible.
- Policy CI 1.3: Establish a minimum motor vehicle Level of Service (LOS) standard of LOS D at intersections. The following shall be taken into consideration in applying LOS standards: (see General Plan Page 2-5 for full list of considerations)
- Policy CI 1.6: When analyzing impacts to the circulation network created by new development or roadway improvements, consider the needs of all users including those with disabilities, ensuring that pedestrians, bicyclists, and transit riders are considered at an equal level to the needs of automobile drivers.
- Policy CI 2.1 Establish and maintain a system of pedestrian facilities and crossing enhancements that are consistent with the City's Bicycle and Pedestrian Master Plan.
- Policy CI 2.6 Create an accessible circulation network that is consistent with guidelines established by the Americans with Disabilities Act (ADA), allowing mobility-impaired users such as the disabled and elderly to safely and effectively travel within and beyond the City.
- Action CI 2c: Review all transportation improvements to ensure installation in accordance with current accessibility standards.
- Policy CI 1.8: Maintain safe travel conditions for all modes of travel.
- Policy CI 1.9: Consider all transportation improvements as opportunities to improve safety, access, and mobility for all roadway users.
- Policy CI 1.18: Intersections shall be designed to provide adequate and safe access for all users including pedestrians, bicyclists, and motorists of all ages and abilities.
- Action CI 1b: Ensure that future development provides roadway improvements consistent with the Circulation Diagram and implement the roadway improvements identified in the Traffic Impact Fee Study to improve the safety and efficiency of the current circulation system, and to support buildout of the General Plan.
- Action CI 1c: Work collaboratively with Caltrans, the County of Sonoma, and the City of Rohnert Park to identify funding sources and complete the following improvements or improvements of comparable effectiveness, on roadways owned by these agencies within and near the City of Cotati.

The Project is identified under Action CI1b and Action CI 1c in the General Plan and meets the streamlining provisions under CEQA Guidelines Section 15183(d)(1).

4.2.1 Evaluation of CEQA Guidelines Section 15162

The City evaluated whether any of the circumstances described in CEQA Guidelines Section 15162 are present.

Substantial Project Changes. The Project consists of roadway, pedestrian, bicycle, drainage, and safety improvements identified in the Circulation Element of the General Plan and does not represent a substantial change from infrastructure assumptions analyzed in the General Plan EIR.

Substantial Changes in Circumstances. Since certification of the General Plan EIR, the City has adopted an Active Transportation Plan, Vision Zero initiatives, and SB 743 transportation analysis requirements. These changes do not create new environmental impacts; rather, they support multimodal transportation improvements and traffic safety enhancements consistent with the General Plan.

New Information of Substantial Importance. Updated biological surveys, cultural resource investigations, hazardous materials investigations, transportation analyses, and air quality analyses do not identify previously unknown significant environmental impacts. Project impacts remain within the scope of impacts evaluated by the General Plan EIR and are addressed through existing General Plan policies, regulatory requirements, Conditions of Approval or uniformly applied development standards and policies

4.3. CEQA Determination and Summary of Findings

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

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

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

The City of Cotati Representative has reviewed all environmental conditions and as signed below is committed to implementing all regulatory requirements, Conditions of Approval and applicable development standards and policies as part of the Project. The findings above provide a basis for CEQA compliance. The City of Cotati does hereby certify that the above determination has been made pursuant to State and Local requirements.

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

Signature: _____ **Date:** 11/02/26

Noah Housh, Community Development Director
City of Cotati

5. EVALUATION OF ENVIRONMENTAL EFFECTS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5.1. AESTHETICS

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

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015. California Scenic Highway Mapping System, Scenic Highway System Lists, 2019; and City of Cotati Municipal Code. SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; and State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024.

City of Cotati 2013 General Plan EIR Findings

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

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

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

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

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

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

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

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

Project Consistency with the 2013 General Plan EIR

5.1(a,c) (Scenic Vista, Visual Character)– No Substantial Change Relative to the General Plan EIR

The Project will improve SR-116 and realign the intersection of W. Cotati Ave. with SR-116 and install a roundabout. The Project area is not identified on Figure 5.2 of the General Plan which designates Hilltops and Steep Hillsides. The surrounding land uses are commercial and residential and there are no agricultural lands adjacent to the Project area. The Project site does not have any creek corridors visible. Views of the mountains from the roadways will not be impacted by the proposed upgrades as the only project components that will be above visible height will be the streetlights, which are typical element of the urban environment. The Project will result in the removal of trees along the public right of way and to accommodate the realignment of W. Cotati Ave. However, any trees removed will be replaced in compliance with Chapter 17.54 as required by **Condition of Approval (COA) BIO-5**. As conditioned, the Project would not substantially alter the visual character or visual quality of the

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

5.2(b) (Scenic Highways) – No Change Relative to the General Plan EIR

SR-116 is not an officially designated state scenic highway but is eligible for designation by the State of California Department of Transportation Scenic Highways Program.[2] The section of SR-116 that encompasses the Project is in a commercial corridor inside the Urban Growth Boundary and not within the portion that is bordered by open space and agricultural lands. The Project would add bike and pedestrian facilities as well as right- and left-hand turn lanes. As the Project is limited to City and Caltrans compliance roadway improvements, it would not block scenic vistas on either side of the road and would not substantially change the scenic vistas or character of the road. As such, the Project will not result in a substantial new or more severe impact relative to what was identified in the 2013 General Plan EIR.

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

The Project includes the installation of a roundabout and new street lighting as will be necessary for public health and safety. New lighting will be installed along the multi-use path for pedestrians and bicycles, and new street lighting will be installed along SR-116 and W. Cotati Ave in accordance with Caltrans Highway standards and City street lighting standards to ensure traffic safety. The Project site is located in an urbanized area with existing sources of lighting including streetlights, traffic signals, headlights from vehicles, and exterior lighting on adjacent properties. New light sources introduced by the Project would be required to meet City and Caltrans design standards. As such, the Project would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area and will not result in a substantial new or more severe impact relative to what was identified in the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CON 3.19: Utilize trees, both new and existing, to provide visual screening of power lines and other infrastructure within public rights-of-way, without compromising the safety and function of above-ground utility lines.

Status: The Project will include landscaping and tree planting in compliance with Caltrans Highway Design Manual which includes landscaping standards as well as the Cotati Municipal Code. Through the uniform application of these standards and requirements, the Project is consistent with this policy.

Action CON 3k: Continue implementing the City Tree Preservation and Protection Ordinance (Chapter 17.54 of the Municipal Code).

Action CON 3p: The City shall continue to implement the landscape and tree ordinance to give preference to native and drought tolerant species. The Planning Division shall review and revise as necessary.

[2] Caltrans. *California State Scenic Highway System Map*. Website: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed: July 10, 2023.

Status: The Project will result in the removal of trees to accommodate proposed improvement to the circulation network as planned for in the City's General Plan Circulation Element. Through the implementation of **COA BIO-5** which requires compliance with the City of Cotati Municipal Code Chapter 17.54, the Project is consistent with this policy.

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

Status: The Project is required to comply with the CalTrans Design Manual, specifically Chapters 890 Stormwater and Chapter 900 Landscape Architecture which provide requirements for pervious surfaces and landscaping along State Highways. Through the implementation of these standards, landscaping will be used to maximize and preserve a sense of open space. Further, new street lighting will be limited to what is required to protect public health and safety. As such, the Project is consistent with this policy.

Conclusion and Environmental Conditions of Approval

The Project is consistent with the General Plan Circulation Element and as conditioned would not result in any substantial new or more severe impacts to aesthetics relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. Environmental Condition of Approval **BIO-5** would apply to the Project to implement requirements of the 2013 General Plan EIR mitigating policies and actions.

5.2. AGRICULTURAL AND FORESTRY RESOURCES

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

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

City of Cotati 2013 General Plan EIR Findings

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

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

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

- Impact 3.9-4: Implementation of the General Plan would not conflict with existing farmlands, agricultural zoning, or Williamson Act Contracts and would have a less than significant impact.

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

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

Project Consistency with the 2013 General Plan EIR

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

There are no farmland, agricultural lands, or forest lands within or adjacent to the Project. The Project site includes the existing two-lane Gravenstein Highway (SR-116), W. Cotati Ave. and vacant and undeveloped parcels zoned for commercial uses. The Project also includes an 18-foot-wide strip of land along the northside of the SR-116 between 500 feet west of Alder Ave. to Redwood Drive that will be used for public improvements. These sites either have commercial uses or are designated and zoned for commercial uses.

None of the Project parcels are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to FMMP nor forestland pursuant to Section 12220(g) of the Public Resources Code. In addition, the site is not zoned for agricultural use or designated as a Williamson Act contract. As such, project impacts to agricultural resources will be equal or less severe than impacts identified in the General Plan EIR.

There are no applicable mitigating policies or actions in the 2013 General Plan EIR.

Conclusion

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

5.3. AIR QUALITY

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

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; BAAD (formerly BAAQMD) 2017 Bay Area Clean Air Plan; and BAAQMD CEQA Guidelines, April 2022; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025. State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024; and CalEEMod Detailed Report prepared by M-Group on April 26, 2024.

City of Cotati 2013 General Plan EIR Findings

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

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

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

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

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

National and State Regulations

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

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

Bay Area Air District

The City of Cotati is located within the San Francisco Bay Area air basin and regulated by the Bay Area Air District (Air District), the agency responsible for planning, implementing, and enforcing air quality standards within the Bay Area Air Basin, including within the City of Cotati. The Bay Area Air Basin is designated as non-attainment for both the one-hour and eight-hour state ozone standards, 0.09 parts per million (ppm) and 0.07 ppm, respectively. The Bay Area Air Basin is also in non-attainment for PM_{10} and $PM_{2.5}$ state standards, which require an annual arithmetic mean (AAM) of less than 20 $\mu g/m^3$ for PM_{10} and less than 12 $\mu g/m^3$ for $PM_{2.5}$. In addition, the Basin is designated as non-attainment for

the national 24-hour fine particulate matter ($PM_{2.5}$).[3] All other national ambient air quality standards within the Bay Area Air Basin are in attainment.

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

Local Regulation

The City developed a Greenhouse Gas Emissions Reduction Action Plan which is further discussed in the Greenhouse Gas Impacts Evaluation.

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

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

Project Consistency with the 2013 General Plan EIR

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

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

Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM10) and fine particulate matter where particles have a diameter of 2.5 micrometers or less (PM2.5). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide (or cumulative) emissions and localized emissions. High particulate matter levels

[3] On January 9, 2013, Environmental Protection Agency (EPA) issued a final rule to determine that the Bay Area attains the 24-hour PM2.5 national standard. This rule suspends key State Implementation Plan requirements as long as monitoring data continues to show that the Bay Area attains the standard. Despite this EPA action, the Bay Area will continue to be designated as "non-attainment" for the national 24-hour PM2.5 standard until such time as the Air District submits a "redesignation request" and a "maintenance plan" to EPA, and EPA approves the proposed redesignation.

aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children.

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

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

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

An Air Quality Analysis was prepared using the California Emissions Estimator Model (CalEEMod) on April 26, 2024. The analysis includes the improvements to SR-116 and the construction of the new section of West Cotati Ave. The analysis includes the project design using the following measures to reduce emissions:

- Use Cleaner-Fuel Equipment
- Limit Heay-Duty Diesel Vehicle Idling
- Water Exposed Surfaces two times daily
- Use Low-VOC Paints for Striping

The most recent and comprehensive air quality plan is the Bay Area 2017 Clean Air Plan. The primary goals of the Clean Air Plan are to attain air quality standards, reduce population exposure and protect public health, and reduce GHG emissions and protect the climate. The Air District has also developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality and GHG impacts. In formulating compliance strategies, the Air District relies on the planned land uses identified in local general plans. Land use planning affects vehicle travel, which, in turn, affects region-wide emissions of air pollutants and GHGs. The plan includes CEQA Thresholds which are seen below in **Table 1**. These thresholds determine whether the Project would have construction and operational emissions below the Air District’s thresholds.

Table 1: Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs/day)	Average Daily Emissions (lbs/day)	Annual Average Emissions (tons/year)
ROG	54	54	10
NOx	54	54	10
PM_{10}	82 (Exhaust)	82	15
$PM_{2.5}$	54 (Exhaust)	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other BMP	Not Applicable	
Health Risks and Hazards	**Single Sources Within 1,000-foot Zone of Influence**	**Combined Sources (Cumulative from all sources within 1,000-foot zone of influence)**	
Excess Cancer Risk	>10 per one million	>100 per one million	
Hazard Index	>1.0	>10.0	
Incremental annual $PM_{2.5}$	>0.3 µg/m^3	>0.8 µg/m^3	
Greenhouse Gas Emissions			
Land Use Projects – (Must Include A or B)	A. Projects must include, at a minimum, the following project design elements: 1. Buildings a. The Project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). b. The Project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. 2. Transportation a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA: 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. B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).		

Source: Bay Area Air District's April 2022 CEQA Air Quality Guidelines
Note: BMP = Best Management Practices, ROG = reactive organic gases, NOx = nitrogen oxides, PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less;

Construction Emissions

The Project would generate temporary air quality emissions associated with site preparation and demolition, ground disturbance, the operation of heavy-duty construction equipment, workers traveling to the site, and the delivery of materials to the Project site. These activities would create temporary emissions of fugitive dust from site grading, and the release of toxic air contaminants, particulate matter, and ozone precursors (ROG and NOx) from combustion of fuel and the operation of heavy-duty construction equipment.

To estimate the emissions from construction of the Project, the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.16 was used (**Appendix E**). CalEEMod is a statewide model designed to provide a uniform platform to quantify air quality emissions from land use projects, which allows for projection of emissions from on-site construction activity, construction vehicle trips, and evaporative emissions. The construction build-out scenario including equipment list and schedule, were based on default values in CalEEMod. Emissions are calculated based on the whole project being completed at one time over the course of 60 working construction days.

Average daily emissions were computed by dividing the total construction emissions by the number of active workdays. **Table 2** shows the average daily construction emissions of ROG, NOX, PM_{10} exhaust, and $PM_{2.5}$ exhaust during construction of the Project. As indicated in Table 2, predicted annualized project construction emissions would not exceed the Air District significance thresholds during construction.

Table 2 Construction Period Emissions

Year	**ROG**	**NOx**	**PM_{10}**	**$PM_{2.5}$**
Average Daily Construction Emissions Per Year (pounds/day)				
2027	1	9	0.5	0.4
2028	0.1	0.5	<0.1	<0.1
Air District threshold (lbs/day)	54	54	82	54
Exceed Threshold?	**No**	**No**	**No**	**No**

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The Air District CEQA Air Quality Guidelines consider these impacts to be less-than-significant if best management practices are implemented to reduce these emissions. To ensure that emission reduction measures consistent with the Air District recommended basic control measures for reducing fugitive particulate matter are taken, **COA AQ-1** has been established to require the implementation of Air District Best Management Practices to reduce fugitive dust emissions. As conditioned construction of the Project will not result in a substantial new or more severe impacts relative to the 2013 General Plan EIR.

Operation

The Project will install a roundabout and re-align an existing roadway, West Cotati Avenue, and make improvements for pedestrian and bike facilities. As the Project is limited to intersection control for safety and pedestrian/bicycle improvements, and does not include additional travel lanes, the Project

will not result in additional emissions at operation beyond those generated on the existing roadway. The new pedestrian and bicycle facilities will provide alternative methods of transportation. As such, operation of the Project will not create directly or indirectly new emissions and will not result in a substantial new or more severe impacts relative to the 2013 General Plan EIR.

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

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known toxic air contaminant (TAC). Although exhaust would not be considered to contribute substantially to air quality violations, construction exhaust emissions may still pose health risks for sensitive receptors (e.g., nearby residents).

CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and parks. For cancer risk assessments, children are the most sensitive receptors, since they are more susceptible to cancer causing TACs. Residential locations are assumed to include infants and small children. The closest sensitive receptors to the site are the existing residents in the single-family homes on Gillman Road to the south of 116 and west of W. Cotati Ave. of the Project site, and other single-family homes in the surrounding area. Additional sensitive receptors are located approximately 600 feet away in the Cottages on Alder Avenue north of the Project site. The Thomas Page Academy is within 0.25 miles of the Project but over 1,000 feet from the Project and separated by a vegetation buffer. New residential uses are approved but not yet constructed on parcels north of SR-116.

The primary community risk impacts associated with construction emissions are cancer risk and $PM_{2.5}$ exposure. Project construction activities would generate dust and equipment exhaust that could affect nearby sensitive receptors. Project impacts to existing sensitive receptors would likely occur for temporary construction activities. Because the Project will not increase the capacity or traffic on SR-116, there would be no impacts from long-term operational conditions. There are also several sources of existing TACs and localized air pollutants in the vicinity of the Project (e.g. project area roadways and stationary source emitters). In order to limit the effects of temporary construction on sensitive receptors, **COA AQ-2** is imposed. COA AQ-2 requires contractors to reduce diesel particulate matter emissions by using enhanced measures. Through the implementation of COA AQ-2, the Project will not result in a substantial new or more severe impacts relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Status: As required by **COA AQ-1** and **COA AQ-2**, the Project is required to implement Best Management Practices and enhanced measures that will reduce emissions from PM10 and PM 2.5 particulate matter. The Project is well below the thresholds established for toxic air contaminants. Therefore, as conditioned, the Project is consistent with this policy.

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

Status: As conditioned by **COA AQ-1**, the Project is required to implement dust control measures and as such, complies with this policy.

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

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

Status: Project construction emissions were calculated using CalEEMod. The estimated emissions have been referenced in the discussions above. Recommendations to minimize air quality emissions have been imposed on the Project as **COA AQ-1** and **COA AQ-2**. As conditioned, the Project is consistent with this policy. Further, the addition of the multi-use trail and bike and pedestrian facilities along SR-116 are consistent with the Air District's 2017 Clean Air Plan.

Conclusion and Environmental Condition of Approval

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

COA AQ-1: The City of Cotati shall require all contractors to implement the following dust control and exhaust measures during any construction period ground disturbance:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Each contractor shall post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

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

1. All off-road mobile construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for PM (PM10 and PM2.5). Note that engines meeting the U.S. EPA Tier 2 or 3 standards that include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices would meet this standard.
2. Provide line power to the site during the early phases of construction to minimize the use of diesel-powered stationary equipment.
3. Alternatively, use zero-emission or non-diesel fueled equipment.

5.4. BIOLOGICAL RESOURCES

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

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; Final Santa Rosa Plain Conservation Strategy, 2005, USFWS; Recovery Plan for the Santa Rosa Plain, 2016, USFWS; Reinitiation of Formal Consultation on Issuance of Clean Water Act, Section 404 Permits by the U.S. Army Corps of Engineers (Corps) on the Santa Rosa Plain, Sonoma County, California, 2020, USFWS. Highway 116 and West Cotati Ave. Project Aquatic Resources Delineation Map prepared by Monk & Associates on May 4, 2026. Highway 116 and West Cotati Ave. Project Biological Resource Assessment prepared by Monk and Associates October 26, 2023, and updated on September 15, 2026; Special Status Plant Survey Report Year 2 prepared by Monk and Associates on June 5, 2024; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; and State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024.

City of Cotati 2013 General Plan EIR Findings

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

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

- Impact 3.3-1: Implementation of the General Plan could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special--status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Through the implementation of mitigating General Plan Policies CON 1.1 – CON 1.14, OS 1.1, OS 1.4 and mitigating Actions CON 1a – 1k, implementation of the General Plan would have a less than significant impact.

- Impact 3.3-2: Implementation of the General Plan could have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Through the implementation of mitigating General Plan Policies CON 1.1 – CON 1.3. CON 1.7 – 1.14 and mitigating Actions CON 1a, CON 1b, CON 1f, CON 1g – 1k, implementation of the General Plan would have a less than significant impact.

- Impact 3.3-3: Implementation of the General Plan could have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Through the implementation of mitigating General Plan Policies CON 1.1 – CON 1.3, CON 1.7 – CON 1.14 and mitigating Actions CON 1a, CON 1b, CON 1g - CON 1k, implementation of the General Plan would have a less than significant impact.

- Impact 3.3-4: Implementation of the General Plan Update could interfere substantially with the movement of native resident or migratory fish or wildlife species. Through the implementation of mitigating General Plan Policies CON 1.1 – CON 1.4, CON 1.8 – CON 1.14,

OS 1.1, OS 1.4, and mitigating Actions CON 1a, CON 1b, CON 1d, CON 1e - CON 1j, implementation of the General Plan would have a less than significant impact.

- Impact 3.3-5: Implementation of the General Plan could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Through the implementation of mitigating General Plan Policy CON 1.13 and mitigating Actions CON 3k, CON 3l, CON 3o, and CON 3p, implementation of the General Plan would have a less than significant impact.

- Impact 3.3-6: Implementation of the General Plan Update would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation Plan, and as such, would have a less than significant impact.

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

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

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

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

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

The Recovery Plan for the Santa Rosa Plain was released by the United States Fish and Wildlife Service (USFWS) in June 2016 and provides a framework for the recovery of listed species. Subsequently, in 2020, the USFWS published the reinitiation of formal consultation on issuance of Section 404 of the Clean Water Act for the Santa Rosa Plain. The reinitiation of the Biological Opinion analyzes the

impacts to critical habitat as it relates to development in the Santa Rosa Plain. As noted therein, development in the Santa Rosa Plain would result in the filling of wetlands and removal of upland habitat, resulting in the loss of critical habitat for CTS as well as Burke's Goldfield, Sebastopol Meadowfoam, and Sonoma Sunshine. To address these impacts, the Corps provides several minimization measures and best management practices for each species including updates to measures identified in the 2005 Conservation Strategy and 2007 Biological Opinion to reflect current knowledge and more effectively minimize adverse impacts of development within the Santa Rosa Plain.

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

Project Consistency with the 2013 General Plan EIR

A Biological Resource Analysis (BRA) Report was prepared by Monk and Associates on September 8, 2023, and updated on September 15, 2026 (**Appendix B**). The report includes the results of research conducted on California Department of Fish and Wildlife's Natural Diversity Database and in-person general surveys of the Project site conducted on May 3, 2023. The BRA also includes an Aquatic Resources Delineation. In accordance with the Santa Rosa Plain survey guidelines, three surveys for special-status plants were conducted on May 3, 2023, May 25, 2023, and June 7, 2023. In accordance with the Santa Rosa Plain Biological Opinion, a second year of surveys were conducted on April 8, April 30, and May 14, 2024.

The Project site is located on the southwestern boundary of the Santa Rosa Plain. Historically this area was characterized by a mosaic of oak and riparian woodlands and seasonal wetlands including vernal pools. The distribution of these natural communities and habitats has been significantly reduced, and much of the remaining area has been reduced in quality as a result of agriculture, rural residential, and commercial development. The General Plan EIR specifically anticipated impacts associated with future roadway improvements, urban development, special-status species habitat, wetlands, and sensitive biological resources throughout the planning area. The impacts identified for the Project are not unique or peculiar to the site but instead are representative of the same categories of impacts programmatically evaluated in the General Plan EIR. Any required mitigation bank credits and agency permits represent implementation of established regulatory programs and General Plan mitigation policy rather than evidence of a new significant environmental effect.

5.4(a) (Special-Status Species) – No Substantial Change Relative to the General Plan EIR

In compliance with General Plan Conservation Element Action CON 1b, a site-specific Biological Resource Assessment (BRA) was performed. The BRA found that plant cover in the Project area is dominated by non-native grasses and forbs (i.e., broad-leaved plants) and is predominantly ruderal.

Special Status Plants
Seven special status plant species are known to occur in the region of the Project site. None of these special-status plants have been mapped on or adjacent to the Project site, with the exception of

Sebastopol meadowfoam which was mapped more than 20 years ago and which is now extirpated. Owing to the excessively disturbed conditions found at the Project site, special-status plants are not likely to occur. The site could provide marginally suitable habitat for three federally and state-listed plants: the Sebastopol meadowfoam (*Limnanthes vinculans*), Sonoma sunshine (B*lennosperma bakeri*) and Burke's goldfields (*Lasthenia burkei*).

Two years of rare plant surveys on the Project site were completed as required by the USFWS Biological Opinion for the Santa Rosa Plain in 2023 and 2024. These surveys followed all CDFW (2018) and USFWS (2005) survey guidelines and requirements, including the requirement for visits to a local reference site (USFWS 2005). No special status plants were found on the Project site during either year of surveys.

Although federally and state-listed plants were not observed and are unlikely to be found due to the low-quality habitat onsite, per the Programmatic Biological Opinion (USFWS 2020), seasonal wetlands on the site are regarded by USFWS to be "suitable habitat." Consequently, impacted seasonal wetlands on the Project site are required to be mitigated as "suitable" listed plant habitats. Therefore, **COA BIO-1** requires the purchase of preservation or establishment credits for Sebastopol meadowfoam at a ratio of 1.5:1 from a USFWS-approved mitigation bank(s) located in the same Core Area as the Project site.

Special Status Animals

A total of 10 special-status animal species are known to occur in the region of the Project site but no evidence of these species was found in the Project area during site surveys. However, the Project site is located within the known range of the Sonoma County "Distinct Population Segment" (DPS) of the California tiger salamander (CTS). Under the Federal Endangered Species Act (FESA), the USFWS emergency-listed the Sonoma County DPS as endangered on July 22, 2002. On March 4, 2010, CDFW state-listed CTS as a threatened species under the California Endangered Species Act (CESA).

The roadside ditches and the seasonal wetlands along the Project site are not deep enough and do not hold water long enough to support a CTS breeding attempt to successful metamorphosis. Further, there are no CTS breeding pools within 500 feet of the Project site and no potential breeding pools within one mile of the site. The closest historic occurrence, now extirpated, was approximately 0.17 miles directly northeast of the Project site. There has been no breeding habitat in the vicinity of the Project site since the only two confirmed breeding habitats were filled (and mitigated) over 20 years ago.

Due to an absence of suitable breeding habitat on the Project site and within 0.5 miles of the Project site, it is very unlikely that CTS remain in the immediate area today. Especially given the fact that their known over-summering habitat was mass graded and the elevation on that property was changed by the addition of clean fill. The possibility of CTS migrating into the Project area today is very low because habitats are no longer suitable for this species.

Regardless, the Project site is within federally designated Critical Habitat and falls within the USFWS Recovery Plan's West Cotati Core CTS area. As required by the Biological Opinion (USFWS 2020), because of the designation, the Project must mitigate impacts on CTS habitat. According to the Programmatic Biological Opinion, for projects that are greater than 500 feet and within 2,200 feet of a known breeding site, and for projects beyond 2,200 feet from a known breeding site, but within 500

feet of a non-breeding occurrence, mitigation is required at a ratio of two square feet for every one square foot of impact to upland habitat (2:1). In accordance with the Biological Opinion, because the site is greater than 500 feet and within 2,200 feet of a known breeding site, **COA BIO-2** requires the purchase of CTS mitigation credits at a ratio of 2:1 prior to the issuance of a grading, demolition, or building permit.

Migratory Birds
Birds of prey such as White-tailed Kite, Cooper's Hawk, Red-shouldered Hawk, Red-tailed Hawk, American Kestrel, Barn Owl, Western Screech-owl, and Great-horned Owl are all known to nest in the region of the Project site which provides a few trees of adequate nesting habitat for some of these species. To comply with the Migratory Bird Treaty Act, all active nest sites would have to be avoided while such birds were nesting. While adult birds can typically fly out of harm's way, nesting birds, their eggs, and young are much more prone to being impacted by construction projects and **COA BIO-3** has been established to require that nesting bird surveys be conducted within 15 days prior to commencing construction if work would begin between February 1 and August 31. The nesting bird survey shall be conducted on the Project site and within a zone of influence around the Project site.

In accordance with the 2013 General Plan Policy Action CON1a, **COA BIO-1 through BIO-3** are imposed as conditions of approval to ensure that the Project will not have impacts on special status species. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to special status species relative to the 2013 General Plan EIR.

5.4(b,c) (Sensitive Natural Communities, Jurisdictional Waters) – No Substantial Change Relative to the General Plan EIR

The Project site contains roadside ditches, seasonal wetlands, linear wetlands, and topographic low areas. One topographic low area, wetland W2, drops one meter below the surrounding area (**Appendix B**). There is a reinforced concrete pipe (16" diameter) located near this wetland that runs under the highway. Additionally, there is another topographic low area along West Cotati Avenue (a roadside ditch wetland) where there is a decrease in elevation of one meter compared to the rest of the site. Roadside ditches along SR 116 are lower than the rest of the Project site; these roadside ditches were formed when SR 116 was constructed.

The Project site has 10,249 square feet or 0.235 acre of waters of the State. Including 8,255 square feet (0.190-acre) of wetlands, 1,790 square feet (0.041-acre) of linear wetlands, and 204 square feet (0.005-acre) of other waters. The waters of the State identified on the Aquatic Resources Delineation Map were confirmed by the Army Corps of Engineers on July 17, 2026 (**Appendix B**).

Seasonal wetlands were characterized by a dominance of hydrophytic vegetation and hydric soils. Hydrophytic (wetland) plant species identified in the mapped wetlands includes various species of rushes *(Juncus xiphioides, J. phaeocephalus,* and *J. patens*), curly dock (*Rumex crispus*), perennial ryegrass (Festuca perennis), and western yellow cress (*Rorippa curvisiliqua*) among others. The largest seasonal wetland is roughly 4,889 square feet (0.112 acres) in size and is dominated by the native wetland grass: annual semaphore grass (*Pleuropogon californicus californicus*).

A few linear wetlands and roadside ditches were identified on the Project site. These linear features follow along the roads and are long and narrow. One of these roadside wetlands is dominated by western yellow cress (*Rorippa curvisiliqua*) and annual semaphore grass (*Pleuropogon californicus*

californicus). Another is dominated by the native Douglas' meadowfoam (*Limnanthes douglasii douglasii*) and non-native annual bluegrass (*Poa annua*).

Water that is captured in the wetlands and other connected low areas flow into the city storm drain system off the Project site. During storm events, these seasonal wetlands and roadside ditches within the Project site boundaries flow to the city storm drain system, which then flows out to the Laguna de Santa Rosa before reaching Mark West Creek. From Mark West Creek water then travels to the Russian River before flowing into the Pacific Ocean. Outside of the mapped roadside ditches and other small wetland features onsite, there are no creeks or rivers located on the Project site. The aquatic features on the project site are ephemeral,, physically separated from any perennial water by uplands and constructed conveyances, and do not maintain a direct, unbroken surface connection, and/or do not exhibit the physical indicators necessary to establish adjacency under the federal Clean Water Act regulations. Therefore, wetlands on the project site are not under federal jurisdiction.

The shallow, human-altered topographic low areas and ditches on the Project site are highly ephemeral and receive urban runoff which make them nearly unsuitable for any type of wildlife use. As such these areas are not considered sensitive natural communities.

The project would directly impact 7,786 square feet or 0.18-acres of waters of the State, and indirectly impact to 814 square feet or 0.02 acres of water of the State, resulting in a potentially significant impact. However, the 2013 General Plan EIR identifies the potential to impact wetlands and identifies mitigating policies. In accordance with General Plan Actions CON 1a and 1b, the Project is subject to **COA BIO-4** which requires that the loss of waters of the State be compensated via the purchase of wetland credits from a RWQCB-approved wetland mitigation bank at no less than a 1:1 ratio.

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

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

The Project site is a linear corridor along a heavily traveled highway (SR-116) and city street (West Cotati Avenue). It does not provide a corridor suitable for wildlife movement due to the presence of vehicles, roadway pavement, and surrounding urban development. As such, the Project will not substantially interfere with the movement of any native species or native nursery site. Accordingly, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to wildlife movement relative to the 2013 General Plan EIR.

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

The Project is subject to the City of Cotati Tree Ordinance, Cotati Municipal Code Chapter 17.54 which regulates the protection, preservation and maintenance of native trees, trees of historic or cultural significance, groves and stands of mature tree, and mature trees in general that are associated with proposals for development. The Project will result in the removal of trees including trees that require a tree permit for removal. In order to ensure that the Project complies with the City of Cotati Tree Ordinance (Municipal Code Chapter 17.54) and Policy CON 1.6, **COA BIO-5** requires that prior to commencing site preparation, grading, or construction, a tree removal, replacement, and preservation plan shall be prepared and tree removal and replacement shall comply with City of Cotati Municipal

Code Chapter 17.54. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impacts through conflicts with local ordinances relative to the 2013 General Plan EIR.

5.4(f) (Conflict with a Habitat Conservation Plan) – No Substantial Change Relative to the General Plan EIR

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

The USFWS 2007 Programmatic Biological Opinion is based on the biological framework presented in the Conservation Strategy. Projects that require a Corps permit, that remain consistent with objectives stated in the Conservation Strategy, can be appended to the Programmatic Biological Opinion at the discretion of the USFWS. Projects that are appended to the Programmatic Biological Opinion will be provided individual take authorization for impacts to federally-listed species.

As described in 5.4 (a-d) above, development of the Project will result in impacts to California tiger salamander habitat and a seasonal wetland. **COAs BIO-1 though BIO-3** require the purchase of mitigation bank credits for these special-status species at replacement ratios identified in the USFWS' 2007 Programmatic Biological Opinion (or any successor Programmatic Biological Opinion) and are in accordance with the Policies of the General Plan and the Santa Rosa Plain Conservation Strategy and Recovery Plan. Therefore, the Project does not conflict with any local policies or adopted conservation plans, and the Project, as conditioned, will not result in a new significant impact or substantially increase the severity of a previously identified significant impact through conflicts with a habitat conservation plan relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

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

Action CON 1b: Where sensitive biological habitats have been identified on or immediately adjacent to a project site, the Project shall include appropriate mitigation measures identified by a qualified biologist, which may include, but are not limited to the following:

a. Pre-construction surveys for species listed under the State or Federal Endangered Species Acts, or species identified as special-status by the resource agencies, shall be conducted by a qualified biologist;
b. Construction barrier fencing shall be installed around sensitive resources and areas identified for avoidance or protection; and
c. Employees shall be trained by a qualified biologist to identify and avoid protected species and habitat.

Status: A Biological Resource Assessment was prepared for the Project site in compliance with the Santa Rosa Plain survey guidelines. The BRA identifies species and habitat communities and recommends measures to avoid and offset impacts which are captured in **COA BIO-1 - BIO 5.** As conditioned, the Project complies with this policy.

Policy CON 1.5: Conserve existing native vegetation where possible and integrate plant species native to the region into development and infrastructure projects where appropriate.

Status: The Project is subject to the City of Cotati Land Use Code Section 17.34 Water Efficient Landscaping Standards which requires the Project to select appropriate native species for plant material. Through the application of uniform standards, the Project is consistent with this policy.

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

Status: The Project will result in the removal of trees that may provide nesting bird habitat and contribute to the visual quality of the area. **COA BIO-5** requires compliance with Cotati Municipal Code 17.54 which includes tree protection, preservation, and replacement requirements. **COA BIO-3** requires that nesting bird surveys be conducted prior to the initiation of construction. As conditioned, the Project is consistent with this policy.

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

Status: An aquatic resources delineation was completed as part of the Biological Resource Assessment. The Army Corps of Engineers reviewed the deletion and determined that there are no federal jurisdictional waters on the project site (July 17, 2026). While not regulated federal waters, the wetlands onsite are regulated by the State. **COA BIO-4** requires compensation for the loss of waters of the State via the purchase of wetland credits from a Regional Water Quality Control Board-approved wetland mitigation bank at no less than a 1:1 ratio. As conditioned, the Project complies with this Policy.

Policy CON 3.13: Continue to implement the City's Tree Preservation and Protection Ordinance (Chapter 17.54 of the Municipal Code).

Status: The Project site has both native oaks and non-native trees subject to the City of Cotati's Tree Protection Ordinance. **COA BIO-5** requires a tree preservation and replacement plan and requires that the City apply for a tree removal permit in compliance with Chapter 17.54 prior to the commencement of any site preparation, grading, or construction. Any trees removed shall be replaced in compliance with Table 5-2 in the Tree Protection Ordinance, or as otherwise required by the City of Cotati. As conditioned, the Project is consistent with this policy.

Conclusion and Environmental Conditions of Approval

The Project is consistent with the General Plan Circulation Element and as conditioned would not result in any substantial new or more severe impacts to biological resources relative to what was identified in the General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental condition of approval are required to implement the General Plan EIR mitigating policies:

COA BIO-1: In accordance with agency regulations and per the 2020 Programmatic Biological Opinion for the Santa Rosa Plain, vernal pool conservation credits shall be purchased for impacts to suitable Sebastopol meadowfoam habitat at a 1.5:1 ratio. Credits shall be purchased prior to the commencement of site preparation, grading, or demolition.

COA BIO-2: Prior to site preparation, demolition, or grading, California Tiger Salamander mitigation credits shall be purchased from a USFWS approved Conservation Bank at a ratio of 2 square feet of mitigation for every square foot of upland habitat (2:1).

COA BIO-3: Nesting bird and bat surveys shall be conducted within 15 days prior to commencing any phase of construction work if the work would begin between February 1 and August 31. The nesting bird survey shall be conducted on the Project site and within a zone of influence around the Project site.

COA BIO-4: Prior to demolition, grading, or building, credits from a Regional Water Quality Control Board-approved wetland mitigation bank shall be purchased at a ratio of no less than 1:1 to compensate for the loss of waters of the State.

COA BIO-5: If the final design and engineering plans include tree removal, prior to issuance of any project permits, a tree preservation and replacement plan shall be prepared. If protected trees require removal to accommodate the Project, they shall be replaced in compliance with Chapter 17.54 Tree Protection ordinance. All contractors shall implement the tree protection measures in compliance with Land Use Code Section 17.54.040 of the Tree Protection Ordinance.

5.5. CULTURAL RESOURCES

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

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; and Cultural Resources Evaluation, Archaeological Study for the Gravenstein Highway (SR116)/West Cotati Realignment Project prepared by Evans and DeShazo on September 28, 2023.

City of Cotati 2013 General Plan EIR Findings:

The 2013 General Plan EIR evaluated potential impacts to cultural resources in Chapter 3.4. Within the Cotati Planning Area, 36 resources have been recorded of which 7 are prehistoric Native American archaeological sites, and 2 are historic-period archeological sites, and 27 are built environment resources, 31 of which are within City limits. The 2013 General Plan EIR evaluated the following impacts:

- Impact 3.4-1: Implementation of the General Plan Update could result in the substantial adverse change in the significance of a historical or archaeological Resource. Through the implementation of mitigating General Plan Policies CON 4.1, CON 4.3 – CON 4.6, and mitigating actions CON 4a – CON 4c, and CON 4f, implementation of the General Plan would have a less than significant impact.

- Impact 3.4-2: Implementation of the General Plan could result in the disturbance of human remains. Through the implementation of General Plan Policies CON 4.2 and Action CON 4c and compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98, the implementation of the General Plan would have a less than significant impact.

Project Consistency with the 2013 General Plan EIR

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

Evans and Deshazo (EDS) completed an Archaeological Study of the Project site on September 28, 2023. This included a record search and literature review, a review of information obtained at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS), a search of the Built Environment Resource Directory (BERD), a review of other documents including the 2013 General Plan EIR, a review of the site's environmental setting, and a Pedestrian Field Survey.

According to information on file at the NWIC, approximately 95% of the Project Area has been previously surveyed for cultural resources and there have been 21 other cultural resource studies previously completed within 0.25-miles of the Project Area. NWIC records indicate 13 previously recorded cultural resources within 0.25-miles of the Project Area, including 12 built environment resources and one historic-period archaeological resource. Further, the BERD of Sonoma County lists 73 resources in Cotati, 21 of which are located near the Project site. The 2013 General Plan EIR lists 47 buildings within the City of Cotati that are potentially eligible for the California Register of Historic Resources, five of which are located near the Project site.

Adjacent to the Project site, the Pedestrian Field Survey identified three adjacent commercial buildings along the north side of Hwy 116, east of Alder Drive and north of the Project Area; two commercial properties (Shamrock Building Materials and Reliable Crane & Rigging, Inc.) and one residential property (P-49-000042) along the south side of Hwy 116, south of the Project Area; along West Cotati Avenue are several modern houses to the west and a vacant field with a row of eucalyptus to the east. In addition to eucalyptus trees, the Project Area also contains California black oak and valley oak trees along the northern boundary, and poison hemlock, silver wattle acacia, blackwood acacia, and chicory along the northern and southern boundaries of the highway. On the Project site, the survey resulted in the identification of a eucalyptus tree windrow (aka, windbreak) that, based on historical research, was present by 1942. The windrow extends southwest-northeast for approximately 160 feet along the boundary between APNs 144-050-004 and 144-050-005. The windrow consists of eight large eucalyptus trees with about 15-20 small "volunteer" eucalyptus trees, ranging from about 11 to 80 inches in diameter.

While the eucalyptus tree windrow dates prior to 1942, it is not eligible to be listed as an Historical Resource in the CRHR, because it:

- is not associated with events that made a significant contribution to the broad patterns of local or regional history of the cultural heritage of California or the U.S. (CRHR Criterion 1);
- is not associated with the lives of persons important to local, California, or U.S. history (CRHR Criterion 2);
- does not embody the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (CRHR Criteria 3);
- has not yielded or have the potential to yield information important to history of the local area, California, or the U.S. (CRHR Criterion 4).

The Project site includes a paved two-lane highway with unpaved shoulders and undeveloped land. Based on a review of the historical information available, the Project site has a low potential for buried historic-period archaeological resources because prior to the construction of SR 116 and West Cotati

Ave, the site appears to have been used for agricultural purposes. There do not appear to have ever been any buildings or structures within the boundaries of the Project site.

While there is limited potential for buried pre-contact resources, the 2013 General Plan Action CON 4c requires the implementation of specific actions in the event of an inadvertent discovery. Accordingly, **COA CUL-1** requires the implementation of Action CON 4c if cultural resources or human remains are discovered during ground-disturbing project activities.

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

2013 General Plan EIR Mitigating Policies and Actions

Policy CON 4.2: Ensure that human remains are treated with sensitivity and dignity and ensure compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.

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

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

b. If human remains are discovered during any ground disturbing activity, work shall stop until the Community Development Department and the County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) and the most likely descendants have been consulted; and work may only resume when appropriate measures have been taken and approved by the Community Development Department.

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

d. If human remains are discovered during any ground disturbing activity, work shall stop until the Community Development Department and the County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) and the most likely descendants have been consulted; and work may only

resume when appropriate measures have been taken and approved by the Community Development Department.

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

Conclusion and Environmental Condition of Approval:

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

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

a. If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Department shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Department.
b. If human remains are discovered during any ground disturbing activity, work shall stop until the Community Development Department and the County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) and the most likely descendants have been consulted; and work may only resume when appropriate measures have been taken and approved by the Community Development Department.
    - If the skeletal remains are found to be prehistoric, Native American and not modern, then the coroner must call the Native American Heritage Commission in Sacramento that will designate the "Most Likely Descendant" (or MLD) of the discovered remains. The MLD will be responsible for recommending the disposition and treatment of the remains (before construction is resumed). Although the likelihood of encountering human skeletal remains in the project area seems slight, it is important to have a procedure for alternate tasks that can be put into effect quickly in the event that human remains are discovered. This allows for work to continue elsewhere on the project area (where appropriate given the size of the property and location of the discovery) while the remains are properly investigated.
c. If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Department shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only

resume when appropriate protections are in place and have been approved by the Community Development Department.

d. If human remains are discovered during any ground disturbing activity, work shall stop until the Community Development Department and the County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) and the most likely descendants have been consulted; and work may only resume when appropriate measures have been taken and approved by the Community Development Department.

5.6. ENERGY

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

Source: Cotati General Plan 2035; General Plan EIR; Sonoma Clean Power 2021 Annual Report; BAAD (formerly BAAQMD) 2017 Bay Area Clean Air Plan; Climate Action 2020 and Beyond: Sonoma County Regional Climate Action Plan, prepared by Sonoma County Regional Climate Protection Authority, July 2016; BAAQMD 2017 CEQA Guidelines; and City of Cotati Municipal Code; CalEEMod Detailed Report prepared by M-Group on April 26, 2024; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; and State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024.

City of Cotati 2013 General Plan EIR Findings:

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

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

Sonoma County Climate Action Plan 2020

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

the County of Sonoma, and several partner entities to take further actions to reduce GHG emissions community-wide and respond to the threats of climate change.

Project Consistency with the 2013 General Plan EIR

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

Construction of the Project will utilize equipment that will utilize energy and fuels. As noted in Chapter 5.3 Air Quality of this document, construction of the Project is required to implement BAAD Best Management Practices and enhanced measures identified in **COA AQ-1** and **COA AQ-2.** This includes limitations on idling and proper maintenance for equipment. These requirements will ensure that no wasteful use of energy will occur during the construction of the Project. Upon completion, on-going maintenance and the operation of the lighting will require energy necessary for safety and operation. As such, the energy used for ongoing operation would not be wasteful. Any landscaping will be required to comply with the Model Water Efficiency Landscaping Ordinance (MWELO) which requires the use of plants that have limited water needs. As such the Project would not result in inefficient, wasteful, or unnecessary consumption of energy.

The safety improvements, including installation of a roundabout and bicycle and pedestrian safety improvements support the City's goals in the Bicycle and Pedestrian Master Plan and are intended to encourage alternative modes of transportation. Additionally, the Project is consistent with the Sonoma County Climate Action Plan 2020, Goal 5, which encourages a shift toward low-carbon transportation options. The Project is also consistent with Measure 5-L4: Supporting bicycle/pedestrian measures. As such, operation of the Project does not conflict with state or local plans to reduce energy usage and includes infrastructure to support active transportation options.

As conditioned, the Project will not result in the wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation and the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact.

2013 General Plan EIR Mitigating Policies and Actions

Policy CON 2.12: Encourage public transit, ridesharing and van pooling, shortened and combined motor vehicle trips to work and services, use of bicycles, and walking. Minimize single passenger motor vehicle use.

Status: The design of the Project includes improvements for bikes and pedestrians as well as connectivity with the City's bicycle and pedestrian network that will encourage bicycle and pedestrian use along SR-116. As such, the Project is consistent with this policy.

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

Status: The Project includes improvements to SR-116 to accommodate pedestrian and bicycle facilities. Widths of all lanes and paths are designed as required for safety and accessibility per the City's Street standards and the Caltrans Design Standards. The final design is subject to the Caltrans landscaping requirements as well as the City's requirements for street tree planting. Through uniformly applied standards, the Project minimizes the use of pavement to the greatest extent feasible. As such, the Project is consistent with this policy.

Policy LU 1.5: Use sustainable, best management practices in green building, stormwater management, and conservation to mitigate infrastructure impacts, while minimizing effects on water, sewer, and energy resources.

Status: The Project will improve SR-116 to accommodate pedestrian and bike facilities and install a roundabout that will enhance intersection safety. COA AQ-1 and COA AQ-2 require project contractors to reduce emissions through best management practices and enhanced measures to reduce emissions that will also reduce energy usage. These include measures such as limiting idling. Further, the Project is required to comply with local, regional, and state Stormwater regulations and will not result in an increase in usage of water, sewer, or energy resources. As such, the Project is consistent with this policy.

Conclusion and Environmental Condition of Approval:

The Project is consistent with the General Plan Circulation Element and would not result in any substantial new or more severe impacts to energy relative to what was identified in the 2013 General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. Environmental Condition of Approval **AQ-1** and **AQ-2** is applied to the Project to implement requirements of the 2013 General Plan EIR mitigating policies and actions.

5.7. GEOLOGY AND SOILS

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

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

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024; CA Department of Conservation online Geologic Maps accessed June 14, 2023; and City of Cotati Municipal Code; and Custom Soil Resource Report prepared using USDA Natural Resource Conservation Service Websoil pulled by M-Group on August 16, 2023.

City of Cotati 2013 General Plan EIR Findings

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

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

- Impact 3.5-1: Implementation of the General Plan has the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic--related ground failure, including liquefaction. Through the implementation of mitigating General Plan Policies CSF 1.8, SA 2.1 - 2.11 and Actions SA 2a – SA 2k, implementation of the General Plan would have a less than significant impact.

- Impact 3.5-2: Implementation of the General Plan has the potential to result in substantial soil erosion or the loss of topsoil. Through the implementation of mitigating General Plan Policies SA 2.5 -SA 2.10 and Actions SA 2d and SA 2f, implementation of the General Plan would have a less than significant impact.

- Impact 3.5-3: Implementation of the General Plan has the potential to 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. Through the implementation of mitigating General Plan Policies SA 2.1 – SA 2.9 and Actions SA 2a – SA 2i, implementation of the General Plan would have a less than significant impact.

- Impact 3.5-4: Implementation of the General Plan has the potential to result in development on expansive soil, as defined in Table 18--1--B of the Uniform Building Code (1994), creating substantial risks to life or property. Through the implementation of mitigating General Plan Policies SA 2.1- SA 2.3, SA 2.11 and Actions SA 2a – 2c, SA 2e, SA 2h, and SA 2i, implementation of the General Plan would have a less than significant impact.

- Impact 3.5-5: Implementation of the General Plan does not have the potential to have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Because there are no septic tanks or alternative wastewater disposal systems utilized for new development, implementation of the General Plan would have a less than significant impact.

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

Project Consistency with the 2013 General Plan EIR

5.7(a i-ii) (Seismic Hazards) – No Change Relative to the General Plan EIR

The Project site is located approximately 1.5 miles north of the Tolay Fault, 3 miles east of the Bloomfield Fault, and 5 miles east of the Americano Creek Fault none of which are Alquist Priolo Fault Zones. The Project is approximately 4 miles west of the Rodgers Creek Fault Zone and 15 miles east of the San Andreas Fault, both of which are Alquist Priolo fault zones.

The Project will be engineered in accordance with CalTrans Design Standards. These standards ensure that the road will be designed to limit substantial adverse effects including the risk of loss, injury, or death due to seismic hazards. Through the implementation of uniformly applied standards, the Project will not have substantial adverse effects from seismic hazards and the Project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to seismic hazards relative to the 2013 General Plan EIR.

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

The Project has an underlying soil of HaB—Haire fine sandy loam, hummocky, 0 to 5 percent slopes and there are no known earthquake faults on the Project site and is located in an area identified as having low and moderate risk of liquefaction.[4] As established by **COA GEO-1**, prior to final design and engineering, a Geotechnical Report shall be completed including an assessment of liquefaction potential and any design elements to address liquefaction. Through the implementation of uniformly applied standards, the Project will not have substantial adverse effects from liquefaction and the Project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to liquefaction hazards relative to the 2013 General Plan EIR.

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

The Project site is not in an area identified in General Plan Map Figure 10.1 Geologic and Soil Hazards as very high landslide potential. Additionally, the area of the Project is shown as having zero landslide susceptibility according to the California Department of Conservation Landslide Susceptibility Map most recently updated on September 29, 2021.[5] Because there is no risk of landslides in or affected by the Project area, the Project will not have substantial adverse effects from landslides and the Project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to landslide hazards relative to the 2013 General Plan EIR.

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

Chapter 14.36 of the Cotati Municipal Code requires an erosion control plan prepared by a Civil Engineer or other qualified professional that outlines appropriate measures to minimize soil erosion and sedimentation, and that complies with design and construction standards contained in the City's

[4] California Geological Society. CA Bay Area Liquefaction Risk. Updated June 22, 2014. Accessed: August 16, 2023.

[5] California Department of Conservation. *Landslide Susceptibility Map.* Website: https://cadoc.maps.arcgis.com/home/item.html?id=3cdc744bec6b45c28206e472e8ad0f89 Accessed: August 16, 2023.

Municipal Code. Prior to commencing site work, a stormwater control plan and erosion control plan are required by **COA HYD-1**. As conditioned, the Project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to erosion relative to the 2013 General Plan EIR.

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

The Project includes improvements to a segment of the existing highway SR-116 and the realignment of the intersection with West Cotati Ave. A geotechnical report will be prepared and include recommendations to ensure that geotechnical considerations are properly addressed such as soil compaction, treatment, and appropriate grade. **COA GEO-1** has been established to ensure preparation of the analysis and report. The final design plans will comply with the standards required by Caltrans Highway Design Manual. Through the implementation of the uniform standards, the Project will not result in adverse impacts due to expansive soil, or soil that is unstable, or that would become unstable as a result of the Project. As conditioned and through compliance with City and Caltrans street standards, the Project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to geologic stability relative to the 2013 General Plan EIR.

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

The Project will not introduce any new wastewater facilities. As such, the Project is consistent with the findings of the 2013 General Plan EIR and the Project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to septic tanks relative to the 2013 General Plan EIR.

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

The potential to uncover undiscovered paleontological resources was considered in the 2013 General Plan EIR, in which Action CON 4c is identified, and requires work to be suspended within 100 feet of any discovered potentially unique paleontological resources and for the City to be contacted to coordinate further investigation. In compliance with Action CON 4c, **COA CUL-1** is imposed on the Project. **COA CUL-1** requires specific protocol to be followed if paleontological resources are encountered during ground disturbing activities. As conditioned and pursuant to Action CON 4c, the Project complies with the General Plan and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to paleontological resources relative to the General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Status: The Project is within Caltrans Right of Way and will be required to comply with the Highway Design Manual. **HYD-1** requires the preparation of a final Stormwater Control Plan including an

erosion and sediment control plan prior to issuance of a building permit or commencing any phase of road construction. As conditioned, the Project complies with this policy.

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

Status: **COA GEO-1** has been established to ensure that the geotechnical analysis is completed prior to final design and engineering. As conditioned, the Project complies with this policy.

Conclusion and Environmental Condition of Approval

The Project is consistent with the General Plan Circulation Element and would not result in any substantial new or more severe impacts to geology and soils relative to what was identified in the General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. Environmental conditions of approval **COA CUL-1** and **COA HYD-1,** as well as the following environmental condition of approval is required to implement the General Plan EIR mitigating policies:

COA GEO-1: Prior to final design and engineering (100% plan set) a geotechnical analysis and report shall be completed by a geotechnical engineer. The report shall include subsurface soil conditions and recommendations for design if poor subsurface conditions exist. The recommendations shall be incorporated into the final design and engineering and implemented in the construction of the Project.

5.8. GREENHOUSE GAS EMISSIONS

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

Source: Cotati General Plan 2035; General Plan EIR; and BAAD (formerly BAAQMD) CEQA Guidelines, April 2022; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024; and CalEEMod Detailed Report prepared by M-Group on April 26, 2024.

City of Cotati 2013 General Plan EIR Findings

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

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

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

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

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

Caltrans/Statewide Highway System CEQA Guidance

In September of 2020, the California Department of Transportation (Caltrans) released the Transportation Analysis under CEQA subtitled "Evaluating Transportation Impacts of State Highway System Projects." While the Bay Area Air Quality Management District provides guidelines for development projects, infrastructure projects are not specifically addressed by the BAAD CEQA Guidelines. The Transportation Analysis Framework (TAF) and Transportation Analysis under CEQA (TAC) guide transportation impact analysis for projects on the State Highway System (SHS) as part of the California Environmental Quality Act (CEQA) process. The California Department of Transportation (Caltrans) has prepared these documents to guide implementation of Senate Bill (SB) 743 (Steinberg, 2013). The TAF and TAC establish Caltrans guidance on how to analyze induced travel associated with transportation projects and how to determine impact significance under CEQA, respectively. These documents guide transportation impact analysis for projects on the State Highway System.

Sonoma County Climate Action Plan 2020

As presented in the Sonoma County Climate Action Plan 2020, the City of Cotati's GHG inventory in 2010 resulted in the emission of 52,060 metric tons of CO2e per year (MT CO2e/yr) and a per capita emission level of 7.2 MT CO2e/yr. A backcast effort identified 1990 emission levels at 51,480 MT CO2e/yr and a per capita emission level of 9.0 MT CO2e/yr. 5.8.2 presented below provides the forecast emission levels for the City of Cotati.

Table 3: GHG Emission Forecasts

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

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

The City of Cotati will achieve GHG reduction targets through a combination of state, regional and local measures. At the state level, fuel efficiency standards, Title 24 building standards, low carbon fuel standard, and RPS are estimated to achieve a GHG reduction of 13,710 MTCO2e by 2020. Regional efforts are projected to achieve a GHG reduction of 4,070 MTCO2e through activities carried out by the Regional Climate Protection Authority, Sonoma Water, County of Sonoma Energy Independence Office, Sonoma County Transportation Authority, and Sonoma Clean Power. Locally, the City of Cotati is expected to realize a GHG reduction of 1,550 MTCO2e through implementation of Measure 11-L1 (Senate Bill SB X7-7 – Water Conservation Act of 2009), Measure 2-L4 (Solar in Existing Non-Residential Buildings), and Measure 2-L2 (Solar in Existing Residential Buildings).

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

Project Consistency with the 2013 General Plan EIR

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

The Project will realign W. Cotati Avenue to improve safety and widen SR-116 to add pedestrian and bicycle facilities, turn lanes and safety upgrades. The Project will not create or induce new vehicular traffic and will provide critical infrastructure and improved safety for alternative modes of transportation. The new roundabout will have negligible impacts on Greenhouse gas emissions.

Construction GHG Emissions

The Project construction phase, as noted in the Air Quality section above, will last for an estimated 60 days and have a an estimated 1,674 lbs/day of CO2e emissions. However, the Project will minimize emissions by complying with the BAAD best management practices as required by **COA AQ-1.** Additionally, **COA AQ-2** requires a Construction Minimization Plan including enhanced measures to reduce emissions. Because construction emissions are temporary and variable, the Air District has not developed a quantitative threshold of significance for construction related GHG emissions but recommends that lead agencies quantify and disclose GHGs that would occur during construction and that projects should incorporate best management practices for reducing GHGs from construction-related activities. These measures are addressed in **COA AQ-1** and **COA AQ-2**, and therefore, the construction of the Project would not have a not result in a new significant impact or substantially increase the severity of a previously identified significant impact to greenhouse gas emissions relative to the 2013 General Plan EIR.

Operation GHG Emissions

The Caltrans Guidance for determining whether a State Highway System Transportation project will have VMT or GHG impacts is to use the Transportation Analysis under CEQA (TAC). The TAC screens projects for impacts based on whether the project will be a non-capacity-increasing or capacity-increasing project. In accordance with the Office of Planning and Research (OPR)'s technical advisory the following types of projects are non-capacity-increasing projects:

- Installation of roundabouts or traffic circles
- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity are considered non-capacity-increasing.
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, emergency truck pullovers, or emergency breakdown lanes that are not utilized as through lanes are also considered non-capacity-increasing projects.
- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of -way.
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel.

The Project will install a roundabout at the intersection of W. Cotati Ave. and SR-116 to improve safety. Additionally, the project will construct enhanced bike and pedestrian facilities, and a multi-use path.

As all the components of the project are considered non-capacity-increasing and as such fall below the screening level in the TAC/TAF Guidelines published by CalTrans. Therefore, operation of the project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact to greenhouse gas emissions relative to the 2013 General Plan EIR.

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

The Project will implement a project identified in both the City's General Plan and the Active Transportation Plan (ATP). The improvements provide pedestrian and bicycle facilities and additional safety through the installation of a roundabout consistent with Goal 5: Encourage a Shift Toward Low-Carbon Transportation Options and Measure 5-L4: Supporting Bicycle/Pedestrian Measures in the Region's Climate Action Plan, Climate Action 2020 and Beyond. As the Project is consistent with the existing plans to reduce greenhouse gas emissions and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CI 3.1 Actively support the Regional Climate Protection Authority (RCPA) in its efforts to reduce GHG emissions to a level that is 25% below 1990 levels by 2015 and 40% below 1990 levels by 2035.

Action CON 2e: Continue to review new development, significant remodels, and infrastructure projects for consistency with county-wide Climate Action Plan 2020.

Status: The Project will improve access, safety, and the quality of facilities for alternative modes of transportation including walking and biking. As such, the Project is consistent with Goal 5: Encourage a Shift Toward Low-Carbon Transportation Options and Measure 5-L4: Supporting Bicycle/Pedestrian Measures in the Region's Climate Action Plan, Climate Action 2020 and Beyond. As such, the Project is consistent with the county-wide Climate Action Plan 2020.

Policy CON 2.11: Preserve, protect and enhance, as appropriate, the City's carbon sequestration resources, also referred to as "carbon sinks," to improve air quality and reduce net carbon emissions.

Status: The Project will result in the removal of trees, however, through the implementation of **COA BIO-5**, the Project is required to comply with City of Cotati Municipal Code Chapter 17.54 which requires replacement of trees that are removed. As conditioned, the Project is consistent with this policy.

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

Status: The Project includes a Class 1 multi-use pathway that will be separated from the road. A landscaping plan including trees will be prepared as part of the final plans. As such, the Project is consistent with this policy.

Conclusion

The Project is consistent with the General Plan Circulation Element and as conditioned will not result in any substantial new or more severe impacts to Greenhouse Gas Emissions relative to what was identified in the General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. Environmental Condition of Approval **AQ-1** and **AQ-2** are applied to the Project to implement requirements of the 2013 General Plan EIR mitigating policies and actions.

5.9. HAZARDS/HAZARDOUS MATERIALS

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

loss, injury or death involving wildland fires?	

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; California Code, Health and Safety Code Section 25501(n)(1); Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021, prepared by Tetra Tech Consultants for Permit Sonoma, October 2021; Phase I Environmental Site Assessment, prepared by Harris and Lee Environmental Sciences, LLC on July 12, 2023; GeoTracker, managed by the State Water Resources Control Board, June 15, 2023; EnviroStor, managed by the Department of Toxic Substances Control, June 15, 2023; State Route 116 Safety Improvement Project Memorandum prepared by Fehr & Peers on June 4, 2024; and City of Cotati Municipal Code.

City of Cotati 2013 General Plan EIR Findings

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

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

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

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

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

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

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

The General Plan EIR concluded that implementation of the General Plan would result in less than a significant impact to hazards and hazardous materials through compliance with applicable federal, state, and local regulations and policies as well as the implementation of mitigating policies CSF 2.28-2.32, CSF 2.36, 3.7-3.8, SA 1.1- SA 1.7, SA 1.9 and mitigating actions CSF 2o-2p, CSF 3d, SA 1a – 1i.

Sonoma County Hazard Mitigation Plan

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

Project Consistency with the 2013 General Plan EIR

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

A Phase I Environmental Site Assessment was conducted by Harris and Lee Environmental Sciences, LLC and a report prepared on July 12, 2023 (**Appendix D**). The purpose of the Environmental Site Assessment Phase I Investigation is to provide information as to the Recognized Environmental Conditions on or near the Project. Recognized Environmental Conditions are defined with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and petroleum products.

The Project site encompasses the existing roadway as well as portions of parcels that have historically been used for farming. Historically, the southern portion of Parcel 144-050-009 was previously developed with a rural residence and farm building. There are no records of previous activities on the site that resulted in listing on hazardous sites through California EPA Envirostor or the California State Waterboard's Geotracker site. However, two former Leaking Underground Storage Tank (LUST) sites in the vicinity were completed and remediated. Due to proximity, there is potential that contamination from the LUST sites could exist on the site. These include:

- H-G Equipment, at 8155 Gravenstein Highway, is incorrectly listed as the Target Property in the EDR Radius Report. The site is listed on numerous databases including the LUST site list

for a release of petroleum hydrocarbons and is listed as Completed-Case closed as of May 1, 1998.

- ARCO #1341/BP West Coast Products, LLC/AM/PM Mini Market/Sillada Valero/Save On Gas/Walt's Richfield Service, Leatherwood, Inc., 8505 Gravenstein Highway, is incorrectly listed as the Target Property in the EDR Radius Report. The site is listed on numerous databases including the LUST site list for a release of petroleum hydrocarbons. The site is listed as Completed-Case Closed LUST as of March 11, 2014.
- TOSCO Northwest/Cotati Mobile/BP Service Station/United #5426/Cayo Oil, 8510 Gravenstein Highway, is located approximately 159 feet east of the Subject Property. The property is listed on numerous databases including the LUST site list for a release of petroleum hydrocarbons. The site is listed as Completed-Case Closed LUST as of March 11, 2014.
- Fairfax French Cleaners, 7950 Redwood Drive No. 6, is located approximately 281 feet east of the Subject Property (crossgradient with respect to the expected north-northeasterly direction of groundwater flow). The site is listed on the EDR Hist Cleaners database (2001-2003) and as a RCRA-SQG for use of PCE. No releases associated with the site were identified.
- Minatta Transportation Company/Reliable Crane/Minatta Trucking/Facility 49-000-000350, 8184 Highway 116, is located approximately 288 feet west of the Subject Property. The site is listed on several databases for handling and disposal of hazardous waste. Several inspection violations were noted. No spills associated with the site were identified.
- Classic Valet Service Not, Inc., 8555 Gravenstein Highway, is located approximately 293 feet east of the Subject Property (crossgradient with respect to the expected north-northeasterly direction of groundwater flow). The site is listed on the EDR Hist Cleaners database (2001-2003) and as a RCRA-SQG for use of PCE. No releases were identified.
- Shamrock Materials/Minatta Trans Co, 8150 Gravenstein Highway, is located approximately 407 feet west of the Subject Property. The property is listed on numerous databases, including the SLIC database for a release of diesel. The site is listed as Completed-Case Closed as of February 26, 1999.

Based on their regulatory status, the above sites are not expected to pose significant environmental risk. However, there is potential for residual petroleum hydrocarbons in soil, soil vapor, or groundwater (if accessed).

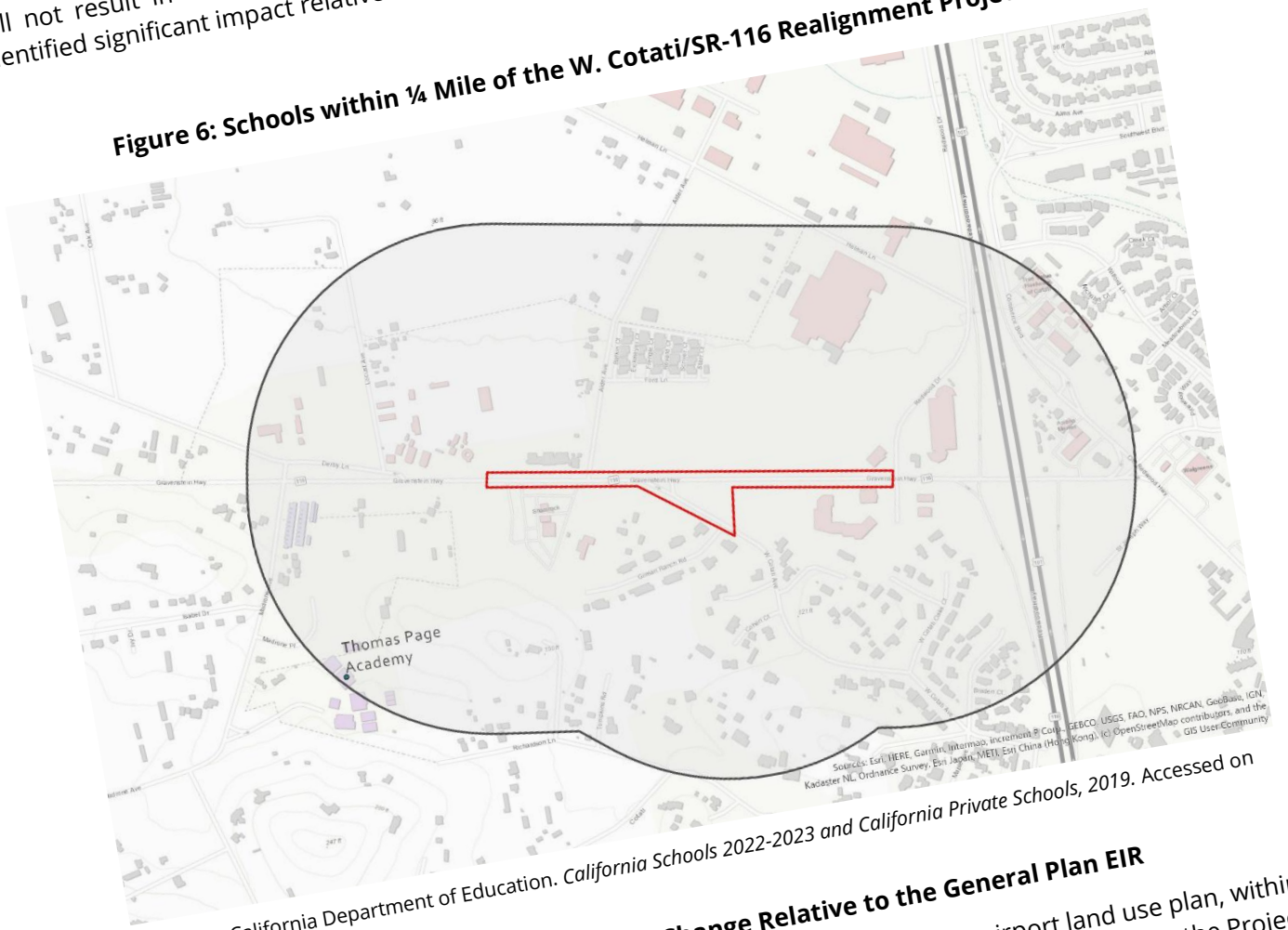
Additionally, the Standard and Additional Environmental Records Search disclosed that due to long term road use, aerially deposited lead (ADL) may be present on the site. ADL is associated with leaded gasoline which was commonly used beginning in the 1920s until it was banned in 1975. However, emissions containing lead may have been deposited in and around areas where leaded gasoline was consumed.

The construction phase of the Project will include grading and trenching as well as repaving. During this work, soils that potentially contain ADLs and petroleum hydrocarbons may be disturbed. In order to ensure that no hazardous materials are released into the environment during the construction of the Project, **COA HAZ-1** requires a Lead Compliance Plan (LCP), a Soil Management Plan (SMP), and a Health and Safety Plan (HASP) be prepared in compliance with Caltrans guidelines prior to construction. The plan shall include sampling and analyzing soil for lead and petroleum hydrocarbons, appropriate disposal of any hazardous materials, and health and safety protections for workers handling contaminated soils. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

One school site located within 0.25 mile buffer of the Project site. The Thomas Page Academy (the Academy) property line, as shown in **Figure 5.9.1**, is approximately 830 linear feet from the most northern terminus of the Project site (500 feet west of Alder Ave). The Academy's northern and eastern boundary is screened by vegetation approximately 1,000 feet in length which separates the school from neighboring parcels. The requirements of **COA HAZ-1** will ensure that no hazardous materials are emitted during construction and as such, would not emit hazardous materials within ¼ mile of the school. An additional condition has been added, **COA HAZ-2,** which requires that the Project contractors notify the school at least 14 days in advance of any earthwork. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

Figure 6: Schools within ¼ Mile of the W. Cotati/SR-116 Realignment Project



Source: California Department of Education. *California Schools 2022-2023 and California Private Schools, 2019.* Accessed on July 13, 2023.

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

Consistent with the General Plan, the Project site is not located within an airport land use plan, within two miles of a public or private airport, nor within the vicinity of a private airstrip. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

5.9(f,g) (Impair emergency plans, Expose to threats of wildfire) – No Change Relative to the General Plan EIR

The Project will improve roadways and traffic control along SR-116 and West Cotati Avenue through installation of a roundabout. This will improve safety during both daily use and in the event of emergency evacuations.

Further, the realignment of W. Cotati Ave. and improvements to SR-116 will not have any impact on wildfire susceptibility and will improve evacuation routes. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to emergency plans or wildland fire relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Status: Project contractors will be required to implement the conditions in **COA HAZ-1** which includes provisions for the proper disposal of any soils that are found to be contaminated. As such, the Project is consistent with this policy.

Policy CSF 2.30: Design and maintain City streets in such a way so as to maintain acceptable emergency vehicle response times.

Status: The Project will install a roundabout at the intersection of SR-116 and W. Cotati Avenue, provide bicycle and pedestrian facilities, and will include an 8-foot-wide shoulder. The Project will improve traffic flow which will in turn, improve emergency vehicle response times. As such, the Project is consistent with this policy.

Conclusion and Environmental Conditions

The Project is consistent with the General Plan Circulation Element and will not result in any substantial new or more severe impacts related to hazards and hazardous materials relative to what was identified in the General Plan EIR. Furthermore, the Project conditions **HAZ-1** and **HAZ-2** ensure that the Project is consistent with federal, state, and local regulations for the treatment of hazardous materials as identified in the 2013 General Plan EIR, there are no circumstances peculiar to the Project site, and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR.

The following environmental conditions of approval are required to implement the General Plan EIR mitigating policies:

COA HAZ-1: Prior to construction, the City shall prepare a Lead Compliance Plan and a Soil Management Plan in compliance with current Caltrans guidelines, and a worker Health and Safety Plan. The plans shall address:

- Sampling and analysis of soils prior to earth-moving work
- transportation and disposal of any contaminated soil in compliance with state and federal law

- worker health and safety during the handling of potentially hazardous soils

COA HAZ-2: Project contractors shall notify any schools within 0.25 miles of the Project at a minimum of 14 days before commencing earthwork. The notice shall include:

- the dates and timeframe for earthmoving activities
- the location of the proposed activities
- the potential for any contamination that may be released due to earthwork
- the name and phone number of a contact for concerns during project activities

5.10. HYDROLOGY AND WATER QUALITY

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

plan or sustainable groundwater management plan?	

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; City of Cotati Municipal Code; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; and State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024.

City of Cotati 2013 General Plan EIR Findings

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

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

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

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

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

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

- Impact 3.8.6 - Implementation of the General Plan Update would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of failure of a levee or dam, seiche, tsunami, or mudflow. There are no levees or dams upriver from the

City of Cotati and it is not located within the vicinity of a body of water that could be subject to a seiche or tsunami. The relatively level slopes and soil types throughout the City of Cotati result in a very low potential for mudflow. Therefore, implementation of the General Plan would result in a less than significant impact.

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

Stormwater Regulation

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

Project Consistency with the 2013 General Plan EIR

The Project will increase the paved surface along the highway and continue to direct run-off into the existing storm drain infrastructure. Modifications to the storm drains will be conducted as needed to ensure adequate drainage and as required to comply with the NPDES permit.

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

The Project's construction activities and the installation of new impervious surfaces have the potential to result in increased runoff that could contain sediment and other pollutants that could degrade water quality if not properly controlled. Sources of potential pollution associated with construction include fuel, grease, oil and other fluids, concrete material, sediment, and litter. These pollutants have the potential to degrade water quality if not properly managed. However, as concluded in the 2013 General Plan EIR, the NPDES requirements, including the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) and compliance with the RWQCB Order No. R1-2009-0045, Waste Discharge Requirements minimize the impacts from future development. The purpose of the SWPPP is to identify potential sediment sources and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination impacts would not occur during construction activities. The RWQCB requires that that the Project will prepare an SWPPP which must be approved by the RWQCB.

Additionally, the final design and engineering will be required to comply with Chapter 13.68 of the Cotati Municipal Code, which regulates storm water discharge and Chapter 14.36 of the Municipal Code, which contains grading and erosion control requirements. To ensure the final plans comply with these regulations, a condition of approval has been added. **COA HYD-1** requires that an SWPPP and Stormwater Control Plan be prepared as part of final design and engineering.

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

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

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

The State of California adopted the Sustainable Groundwater Management Act (SGMA) in 2014 which called for the creation of local Groundwater Sustainability Agencies (GSA) to develop and implement Groundwater Sustainability Plans for the long-term management of groundwater resources. The Santa Rosa Plain GSA was formed through a joint powers authority (JPA) between the cities of Cotati, Rohnert Park, Santa Rosa, and Sebastopol, Town of Windsor, County of Sonoma, Sonoma Water, Gold Ridge Resource Conservation District, and Sonoma Resource Conservation District (Sonoma RCD) and has a participation agreement with mutual water companies and CPUC-regulated water corporations that allows for participation in the GSA. The Groundwater Sustainability Plan (GSP) for the Santa Rosa Plain Subbasin was approved by the California Department of Water Resources (DWR) on January 26, 2023. It establishes a standard for sustainability of groundwater management and use and determines how the basin will achieve this standard by 2042.

The Project will not utilize groundwater and the improvements will not alter groundwater recharge or otherwise effect groundwater. Furthermore, the Project is required to comply with guidance from the Bay Area Stormwater Management Agencies Association (BASMAA) Post-Construction Manual, including low impact development strategies and best management practices in site design to mimic pre-project site hydrology as required by **COA HYD-2**. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

The Project will maintain a similar drainage pattern as currently exists on the site. However, the Project will increase impervious surfaces that will require additional stormwater drainage features. **COA HYD-3** requires that the City use natural features such as bioswales, vegetation, retention ponds, and other measures to remove pollutants from stormwater and to provide flood control to the maximum extent feasible. Through the implementation of **COA HYD-1 - COA HYD-3**, the Project will not change the overall drainage pattern of the site and will not result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, nor 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. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to drainage relative to the General Plan EIR.

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

The Project is shown in the 500 yr flood plain on the City of Cotati General Plan Figure 10.2 Flooding Hazards. However, the General Plan does not consider the 500-yr flood zone as high risk. Regardless, the Project is designed to manage stormwater which reduces potential release of pollutants during a flood. The Project is not in a tsunami or seiche zone. Therefore, the Project will not place new infrastructure within a flood hazard area and will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to pollutants in flood hazards relative to the General Plan EIR.

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

The Project is conditioned and required to implement all pertinent local, state, and federal agency requirements which will ensure that the Project does not conflict with a Water Quality Control Plan. As concluded in 5.10(b), as conditioned, the Project will have no change to groundwater and will therefore not impact a Sustainable Groundwater Plan. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact resulting from conflicts with a water quality control plan or sustainable groundwater management plan relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Policy SA 3.9: Encourage flood control measures that respect natural drainage features, vegetation and natural waterways, while still providing for adequate flood control and protection

Status: In order to ensure compliance with these policies, **COA HYD-3** has been added to require that final plans use natural features wherever feasible to remove surface water pollutants and provide flood control and protection. As conditioned, the Project complies with this policy.

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

Status: **COA HYD-1** requires approval of a SWPPP by the Regional Water Quality Control Board which will ensure that construction of the Project will not result in adverse impacts to existing flood control and drainage structures. As such, the Project complies with this policy.

Conclusion and Environmental Condition of Approval:

The Project is consistent with the General Plan Circulation Element and 2024 Active Transportation Plan and will not result in any substantial new or more severe impacts to hydrology and water quality relative to what was identified in the General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental conditions of approval are required to implement the General Plan EIR mitigating policies:

COA HYD-1 As part of the final design and engineering, an SWPPP shall be prepared which specifies BMPs that will prevent all construction pollutants from contacting stormwater with the intent of keeping all products of erosion from moving off site into receiving waters. At a minimum, the SWPPP shall identify BMPs for implementation during project construction that are in accordance with the applicable guidance and procedures contained in the California Stormwater Quality Association's California Stormwater Best Management Practices Handbook (2015).

COA HYD-2: As part of the final design and engineering, an engineer shall prepare and submit SWLID Plan that integrates the most current SWLID Design Manual guidelines.

COA HYD-3: In preparing final design and engineering plans, the City shall use natural features such as bioswales, vegetation, retention ponds, and other measures to remove pollutants from stormwater and to provide flood control to the maximum extent feasible.

5.11. LAND USE AND PLANNING

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; and State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024.

City of Cotati 2013 General Plan EIR Findings

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

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

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

Project Consistency with the 2013 General Plan EIR

The Project site is within the Caltrans right of way and on a commercially zoned city-owned property adjacent to existing rights-of-way. The surrounding land uses consist of General Commercial to the north, east, and west of the Project, and Low-Density Residential south of the Project site (**Figure 3. General Plan Land Use**). The Project site is zoned General Commercial – Gravenstein Corridor pursuant to the City of Cotati Zoning Map (**Figure 4: Zoning**). The areas north, east, and west of the

Project are zoned General Commercial – Gravenstein Corridor and south of West Cotati the zone is Residential Very Low Density.

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

The Project would increase the width of the existing SR-116 to accommodate paved shoulders, pedestrian and bike facilities, and infrastructure that will improve connectivity and safety. The proposed installation of a roundabout at the W. Cotati Avenue and SR-116 intersection will enhance safety for all modes of transportation including a protected crossing of SR-116. The proposed improvements are consistent with the planned roadway improvements identified in the City's Circulation Element of the General Plan. As such, the Project would not physically divide a community, but rather advance planned connections identified in the General Plan. Therefore, the Project is consistent with the findings of the 2013 General Plan EIR and the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to physically divide a community relative to the 2013 General Plan EIR.

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

The City of Cotati General Plan Action CI1b requires that the City "*ensure[s] that future development provides roadway improvements consistent with the Circulation Diagram and implement the roadway improvements identified in the Traffic Impact Fee Study to improve the safety and efficiency of the current circulation system, and to support buildout of the general plan.* The action includes the following specific project: *Construct a minor realignment of West Cotati Avenue to Intersect Gravenstein Highway at an improved angle and install a traffic signal at the intersection.*

Additionally, Action CI1c says: *Work collaboratively with Caltrans, the County of Sonoma, and the City of Rohnert Park to identify funding sources to complete the following improvements, or improvements of comparative effectiveness, on roadways owned by these agencies and within the City of Cotati.* The following specific project is identified in the list: *Reconstruct Gravenstein Highway between Madrone Avenue and Redwood Drive to include sidewalks, bicycle lanes, two vehicle travel lanes in each direction, and left turn pockets.*

While Action CI 1b calls for signalization, the actions are intended to achieve Circulation Objective 1A to maintain safe and efficient operating conditions on the Citywide Circulation Network. This objective is supported by the following policies:

Policy CI 1.2: Ensure that the City's circulation network is a well-connected system of streets, roads, highways, sidewalks, and bicycle/pedestrian paths that effectively accommodates vehicular and non-vehicular traffic in a manner that considers the context of surrounding land uses and the needs of all roadway users.

Policy CI 1.8: Maintain safe travel conditions for all modes of travel.

Policy CI 1.9: Consider all transportation improvements as opportunities to improve safety, access, and mobility for all roadway users.

A Caltrans compliant Intersection Safety and Operational Assessment Process (ISOAP) was completed by Fehr and Peers on November 21, 2025, The ISOAP studied three options in Stage 1 including a 1-lane roundabout, a traffic signal, or a two-way stop control (existing) at the intersection of West Cotati and SR-116. Through this process, it was determined that the roundabout would have lower fatal and injury collision rates.

While Action CI 1b specifies signalization, the intent of the action is to address a high priority intersection with a history of collisions. Through the ISOAP process, a safer method of traffic control has been identified that will achieve the intended purpose of the action. As such, the installation of the roundabout at the intersection of SR 116 and W. Cotati Avenue is consistent with the General Plan.

The Project implements the General Plan policies and actions that identify the need to control traffic and improve safety at the intersection of SR 116 and W. Cotati Avenue. Through the environmental review process, conditions of approval have been established to ensure consistency with the General Plan and compliance with the City of Cotati Zoning Code. As conditioned, the Project is consistent with the findings of the 2013 General Plan EIR and the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to land use relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

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

Action CI1b: Ensure that future development provides roadway improvements consistent with the Circulation Diagram and implement the roadway improvements identified in the Traffic Impact Fee Study to improve the safety and efficiency of the current circulation system, and to support buildout of the general plan. (see General Plan Circulation Element for full list)

- Construct a minor realignment of West Cotati Avenue to Intersect Gravenstein Highway at an improved angle and install a traffic signal at the intersection.

Status: As described above, installation of the roundabout serves the same function as signalization as it controls traffic but will have a lower likely fatality and injury collision rate. As such, the project implements this action.

Action CI1c: Work collaboratively with Caltrans, the County of Sonoma, and the City of Rohnert Park to identify funding sources to complete the following improvements, or improvements of comparative effectiveness, on roadways owned by these agencies and within the City of Cotati: (see General Plan Section Circulation Element for full list)

- Reconstruct Gravenstein Highway between Madrone Avenue and Redwood Drive to include sidewalks, bicycle lanes, two vehicle travel lanes in each direction, and left turn pockets.

Status: As described above, this project will implement a project identified in the General Plan, as such, it is consistent.

Policy CI 1.2: Ensure that the City's circulation network is a well-connected system of streets, roads, highways, sidewalks, and bicycle/pedestrian paths that effectively accommodates vehicular and non-vehicular traffic in a manner that considers the context of surrounding land uses and the needs of all roadway users.

Status: The project includes pedestrian and bicycle facilities and the installation of the roundabout will ensure safe connections that accommodate vehicular and non-vehicular traffic to serve existing and proposed development in the area and the project is consistent.

Conclusion

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

5.12. MINERAL RESOURCES

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

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

City of Cotati 2013 General Plan EIR Findings

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

Project Consistency with the 2013 General Plan EIR

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

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

2013 General Plan EIR Mitigating Policies and Actions

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

Conclusion

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

5.13. NOISE

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

Source: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; and City of Cotati Municipal Code; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; and State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024.

City of Cotati 2013 General Plan EIR Findings

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

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

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

level due the proximity of sensitive receivers to major roadways, and because noise attenuation may not be feasible in all circumstances. Therefore, implementation of the General Plan could potentially result in a significant increase in ambient noise levels and would result in a significant and unavoidable impact.

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

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

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

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

- Impact 3.10-6: Development facilitated by the General Plan could expose persons to excessive groundborne vibration levels attributed to SMART train service. The proposed General Plan includes Action N 1b, which requires that individual development projects adjacent to SMART undergo project-specific environmental review and address potential vibration impacts associated with SMART operations. If project-level significant vibration impacts are identified, specific mitigation measures would be required under CEQA. Through implementation of this mitigating action potential impacts from groundborne vibrations associated with SMART operations would be less than significant.

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

receivers to major roadways, and because noise attenuation may not be feasible in all circumstances. As a result, this is a significant and unavoidable cumulative impact.

- The City of Cotati adopted the Findings of Fact and Statement of Overriding Considerations on March 24, 2015, including for the significant and unavoidable impacts identified for noise (Impacts 3.10-1 and 3.10-7). The City findings determined that despite the significant and unavoidable impact to noise, no other project alternative would meet the City's objective to realize the development potential of undeveloped lands for residential, office, and commercial uses necessary for housing opportunity and job growth.

Project Consistency with the 2013 General Plan EIR

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

The Project site is located on a segment of SR-116. The 2013 General Plan EIR notes that the primary source of environmental noise within the City of Cotati is generated by vehicular traffic on US 101and the major roadways in the community, including SR-116 and included an analysis of existing noise levels which determined that at 100 feet from the centerline of SR-116 between Madrone Avenue and US 101, noise levels were 68 dBA.

Construction Noise

During construction of the Project there will be a temporary increase in ambient noise from construction vehicles and equipment. However, **COA NOI-1** requires all project contractors to implement best management practices to minimize construction noise and comply with Section 17.30.050 of the Cotati Municipal Code. As conditioned, the Project will not substantially increase the severity of the significance of impacts nor would it result in new impacts relative to the 2013 General Plan EIR.

Operational Noise

The existing noise environment at the site consists primarily of noise from vehicular traffic on SR-116 and W. Cotati Ave, with distant noise from Highway 101 contributing to background sound levels. Other sources of noise include commercial, agricultural, and residential noise in the vicinity. The Project will not result in an increase in traffic, nor will it increase the speed of vehicles. Accordingly, noise from traffic along SR-116 and W. Cotati Ave will be similar to existing conditions with Project implementation. As such, the Project will not substantially increase the severity of the significance of impacts nor would it result in new significant impacts to noise relative to the 2013 General Plan EIR.

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

The Project would not result in long-term and excessive groundborne vibration and groundborne noise. The City of Cotati General Plan EIR determined that construction activities from buildout of the General Plan could result in periods of significant ambient noise levels and groundborne vibration. Action N 1h contains suggested "best practices" for control of construction noise. In compliance with this action item identified in the General Plan EIR, **COA NOI-1** is required. Furthermore, **COA NOI-1** also requires compliance with the noise Standards outlined in Chapter 17.30.050 of the Municipal Code which establishes allowable hours of operation for construction activities. As conditioned,

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

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

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

2013 General Plan EIR Mitigating Policies and Actions

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

Status: The Project will not result in an increase in vehicle traffic on SR-116 nor W. Cotati Avenue. As no additional vehicles would be added to the roadway as a result of the Project, no additional road noise from traffic would be created. As such, the Project complies with this policy.

Policy N 1.7: The following criteria shall be used to determine the significance, for projects required by the California Environmental Quality Act to analyze noise impacts, of noise impacts for development, transportation, and other projects that increase noise: (see page 8-2 to 8-3 for criteria)

Transportation Noise Sources

- Where existing traffic noise levels are less than 60 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +5 dB Ldn increase in roadway noise levels will be considered significant; and
- Where existing traffic noise levels range between 60 and 65 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +3 dB Ldn increase in roadway noise levels will be considered significant; and
- Where existing traffic noise levels are greater than 65 dB Ldn at the outdoor activity areas of noise-sensitive uses, a + 1.5 dB Ldn increase in roadway noise levels will be considered significant.

Status: The Project will not increase operational noise levels at the Project site because it will not increase vehicle traffic and it will not increase traffic speeds. Therefore, an acoustical study is not required, and the Project complies with this policy.

Policy N 1.11: Require acoustical studies and mitigation measures, where necessary, for new developments and transportation improvements that affect noise sensitive uses such as schools, hospitals, libraries, group care facilities, convalescent homes, and residential areas.

Status: The Thomas Page Academy is located approximately 830 feet away from the Project site. However, there is existing vegetation between the school and the areas of construction that will provide adequate buffers for the temporary noise that would result from the construction of the Project. Operation is not anticipated to create additional noise. As such, the Project does not require an acoustical study and is in compliance with this policy.

Policy N 1.12: Require construction activities to comply with standard "best practices". (See Action N 1h)

Action N 1h: During the environmental review process, determine if proposed construction will constitute a significant impact on nearby residents and require mitigation measures in addition to the standard "best practice" controls. (see **COA NOI-1** for best practice controls)

Status: In compliance with Policy N 1.12 and Action N 1h, **COA NOI-1** is imposed and requires the Project to comply with best practice controls for noise.

Conclusion and Environmental Conditions of Approval:

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

NOI-1: Construction-related noise and vibration impacts shall be attenuated through implementation of the following best management practices (BMPs) for control of construction noise:

- Construction activities shall comply with authorized construction schedules approved by the City and applicable permit agencies.
- Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm on weekdays and 9:00 am and 5:00 pm on Saturdays. No construction shall occur on Sundays or holidays.
- All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
- The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences.
- Unnecessary idling of internal combustion engines shall be prohibited.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the Project site during all project construction.
- Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing at least two weeks prior to construction.
- The construction contractor shall designate a "noise disturbance coordinator" who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures as warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.

5.14. POPULATION AND HOUSING

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

Sources: Cotati General Plan and 2013 General Plan EIR adopted and certified on March 24, 2015; City of Cotati Housing Element, June 2, 2023; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; and State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024.

City of Cotati 2013 General Plan EIR Findings

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

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

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

The most recently adopted Housing Element (6th Cycle) was certified by the State Department of Housing and Community Development (HCD) and demonstrates the City's ability to accommodate its fair share of statewide housing needs, which are allocated by the Association of Bay Area Governments. The Housing Element update accommodates 824 units, which is within

the range of the 1,541 units identified as the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR. As is the potential increase of 1,978 residents[6] that would result from implementation of the Housing Element update, which would not exceed the population growth anticipated under the General Plan of 3,775 new residents.

Prior to adoption the updated Housing Element, the City prepared and certified an addendum to the 2013 General Plan EIR (SCH# 2013082037). The General Plan EIR and Addendum concluded that with implementation of General Plan policies and actions intended to guide growth to appropriate areas and provide services necessary to accommodate growth, the land uses allowed under the proposed General Plan, the infrastructure anticipated to accommodate proposed land uses, and the goal and policy framework would not induce growth that would exceed adopted thresholds. Additionally, the General Plan EIR and Addendum determined that while the General Plan may result in development that would remove residences, development allowed under the General Plan would result in an increase in the total number of residences and provide housing opportunities for persons that may be displaced as a result of development. This provision of replacement "housing opportunities" was found to be self-mitigating as a result of implementation of the General Plan and impacts from population and housing were found to be less than significant.

Project Consistency with the 2013 General Plan EIR

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

The subject Project is an infrastructure improvement project that is identified in the General Plan in Actions CI 1b and CI 1c. The purpose of the Project is to improve safety for vehicles, pedestrians, and bicycles. No additional travel lanes will be added and no increase in capacity is proposed. Rather, improvements including installation of a roundabout will allow for safer and more efficient traffic patterns. Therefore, the proposed roadway improvements would not induce growth at levels beyond what has been anticipated by the City of Cotati General Plan EIR. As there are no plans to demolish housing or rezone land that would be used for housing, the Project would have no impacts related to the displacement of housing or people.

The Project is consistent with the findings of the 2013 General Plan EIR and the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to population and housing relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Conclusion

The Project is consistent with the General Plan Circulation Element and would not result in any substantial new or more severe impacts to population and housing relative to what was identified in the General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more

[6] The California Department of Finance estimates Cotati has an average household size of 2.4 residents per unit (California Department of Finance 2022).

severe significant environmental effects relative to those identified and evaluated in the General Plan EIR. No Conditions of Approval are required beyond compliance with uniformly applied development standards and applicable local and state regulations.

5.15. PUBLIC SERVICES

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

Sources: Cotati General Plan 2035; General Plan EIR; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; and State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on April 19, 2024.

City of Cotati 2013 General Plan EIR Findings

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

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

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

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

Project Consistency with the 2013 General Plan EIR

5.15(a-e) (Fire, Police, Schools, Parks, Other) – No Change Relative to the General Plan EIR

The Project is limited to roadway improvements for safety and pedestrian and bicycle facilities. Implementation of the Project is intended to reduce vehicle accidents and improve safety for bikes and pedestrians. The infrastructure improvements would not require additional public services or increase the demand for police, fire, parks, schools, or other public services. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to public services relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CSF 2.30: Design and maintain City streets in such a way so as to maintain acceptable emergency vehicle response times.

Status: The proposed Project will improve safety of City streets (SR-116 and W. Cotati Ave) and will not result in a reduction in emergency vehicle access, nor create obstacles that could affect emergency vehicle response times. As such, the Project is consistent with this policy.

Conclusion

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

5.16. RECREATION

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

Sources: Cotati General Plan 2035; General Plan EIR; California Code, Government Code Section 66477; City of Cotati Municipal Code; and SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025.

City of Cotati 2013 General Plan EIR Findings

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

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

Project Consistency with the 2013 General Plan EIR

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

The Project will realign the intersection of West Cotati Avenue, install a roundabout, and install improvements to SR-116 to enhance safety and traffic flow, and improve pedestrian and bicycle facilities. The Project is limited to roadway improvements and will not induce growth. As such, the Project will not increase demand for parks or create a need for additional recreation facilities. Furthermore, there are no parks in the Project area. All public parks are located east of US 101 and therefore will not be impacted by construction. The existing passive park adjacent to the Cotati Commons residential development will be retained and unaffected by the proposed Project. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact to recreation relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

No applicable mitigating policies or actions.

Conclusion

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

5.17. TRANSPORTATION

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

Sources: Cotati General Plan 2025; General Plan EIR; Technical Advisory on Evaluating Transportation Impact in CEQA, prepared by the California Office of Planning and Research, December 2018; Cotati Bicycle and Pedestrian Master Plan, prepared by Sonoma County Transportation Authority for the City of Cotati, adopted December 2008, updated April 22, 2014; and Guidelines for Analysis of Vehicle Miles Traveled, adopted by City of Cotati September 22, 2020. SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; and State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on June 4, 2024; Intersection Safety and Operational Assessment Process – State Route 116 Corridor Improvements Project prepared by Fehr & Peers on November 21, 2025.

Cotati General Plan EIR Summary

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

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

impacts and implementation of the General Plan would result in a significant and unavoidable impact.

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

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

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

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

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

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

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

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

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

Level of Service to Vehicle Miles Traveled (SB 743)

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

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

On September 22, 2020 the City of Cotati adopted local VMT guidelines for analyses of vehicle miles traveled. The guidelines identify criteria, situations, and thresholds to determine VMT impacts and their significance.

Public Transit

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

There is an existing unimproved bus stop at the northwest corner of Alder Ave. and SR-116.

Rail Service

Sonoma-Marin Area Rail Transit (SMART) offers passenger rail service in Sonoma and Marin counties. SMART's initial 43 miles of rail corridor includes 10 stations, from the Sonoma County Airport to

Downtown San Rafael, and includes a station in Cotati. The rail corridor travels through the eastern portion of the City of Cotati with a transit stop located at the corner of East Cotati Ave and Santero Way, approximately 2 miles east of the subject Project site. The SMART facilities at buildout will provide 70 miles of passenger rail service and a bicycle-pedestrian pathway.

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

Bike and Pedestrian Facilities

Existing and planned bicycle and pedestrian facilities in Cotati are shown in the Cotati Active Transportation Plan, adopted on May 14, 2024. The Plan identifies several bicycle and pedestrian improvements proposed to be made throughout the City, including improved north/south connectivity across Hwy 116 (and beyond) via a new signalized W. Cotati Avenue intersection, circulation improvements to facilitate alternative transportation circulation into the downtown via Old Redwood Highway, and improving connectivity to Thomas Page Elementary School. Bicycle circulation in Cotati is supported by an existing network of multi-use paths, on-street bike lanes, and bicycle routes. Notable facilities include a segment of the Laguna de Santa Rosa bike path between Commerce Boulevard (in Rohnert Park) and the southern City limits (with one small gap just south of East Cotati Avenue), and on-street bicycle lanes within the City limits on West Sierra Avenue and East Cotati Avenue. The ATP goals include establishing and maintaining continuous clearly identifiable bicycle routes and facilities throughout the City and the plan also calls for walkways and sidewalks along arterial and collector streets to support pedestrian circulation.

Sonoma County Comprehensive Transportation Plan

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

Projects identified in Moving Forward 2050 relative to Cotati include: updating the US 101 and Railroad Avenue Interchange; widening and rehabilitation of SR 116 between US 101 and Stony Point Road and the addition of signalized intersections, new bike lanes, and new sidewalk to improve the vehicle LOS, improve the safety of 116 for all modes of transportation, and create safe new corridors for pedestrian and bicyclists; Bicycle and pedestrian upgrades (citywide); constructing sidewalks along west Cotati Avenue to close gaps; US 101/SR 116 north bound on-ramp improvements; Multimodal streetscape improvements joining all four legs of La Paza Street around La Plaza Park; widening Old Redwood Highway for safer bike lanes, sidewalks, and center island medians; US 101/West Sierra Avenue south bound off-ramp improvements; and local street pavement rehabilitation from La Plaza to Gravenstein Highway.

Project Consistency with the 2013 General Plan EIR

The Project will improve pedestrian, bicycle, and traffic safety through the installation of a roundabout at the intersection of W. Cotati Ave and SR-116 consistent with improvements identified in the 2013 General Plan and consistent with the implementing projects of the Sonoma County Comprehensive Transportation Plan.

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

The Project implements Action CI-1b and CI-1c identified in the Circulation Element of the City's General Plan. The 2021 City of Cotati Local Road Safety Plan (LSRP) identified the intersection of SR-116 and West Cotati Avenue intersection as a high collision rate intersection with the 7th highest collision rate in the city. The LRSP included recommendations to realign the intersection and install a traffic signal to address these collisions. Through the ISOAP process, it was determined that installation of a roundabout would have a lower likely fatality and injury collision rate compared to signalization and the Project will realign the intersection and install a roundabout to implement the LSRP. Additionally, the City recently adopted an ATP as a component of Sonoma County's countywide ATP. The ATP effort includes data and community input that has informed the specific improvements that the City has proposed for this segment of SR 116. Further, the Project realizes goals set forth in the Sonoma County Comprehensive Transportation Plan. Therefore, the project is consistent with City and County policies and objectives.

All project elements are designed to appropriate Caltrans Highway Design Manual (HDM) and would not conflict with Caltrans standards or requirements. Additionally, Caltrans required the preparation of an Intersection Safety and Operational Assessment Process to document multiple options for improving mobility, connectivity, and access at the intersection of State Route (SR) 116 with a future realigned West Cotati Avenue. Through the ISOAP, the project design was revised to select the safest option and comply with Caltrans policies.

Additionally, the proposed roundabout at the intersection of SR-116 and W. Cotati Ave is designed to prioritize operational efficiency, safety, and comfort for all modes of transportation. Based on the estimated future development of adjacent sites (Cotati Village Community, Cotati Village 2, and Redwood Row), Fehr and Peers calculated the projected level of service at the new intersection as shown in Table 4 (**Appendix A**). The Projected LOS includes traffic generated by pipeline projects including the three approved development projects and would be above the minimum required LOS D.

Table 4 Intersection Level of Service

Intersection Approach	Peak Hour	Existing		Future Plus Project (Roundabout)	
		Delay(s)	LOS	Delay(s)	LOS
SR-116 & W. Cotati Ave.	**AM** **PM**	**0.5** **0.9**	**A** **A**	**14.1** **17.7**	**B** **C**
East Bound	AM PM	0 0	A A	15.3 21.0	C C

West Bound	AM PM	0.2 0.9	A A	13.3 15.9	B C
North Bound	AM PM	16.9 16.1	C C	9.5 10.1	A B
South Bound	AM PM	N/A N/A	N/A N/A	12.9 11.1	B B

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

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

The project involves improvements to the existing Right-of-Way on SR116 to re-align West Cotati Avenue and install a roundabout and Class I and Class II bicycle facilities. The project would maintain the roadway's existing capacity and general lane configuration of one lane in the eastbound and one lane in the westbound direction. As discussed in Section 5.8(a) Greenhouse Gas Emissions, Caltrans' Transportation Analysis under CEQA (TAC) and the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA provide guidance on the types of transportation projects that would not lead to a substantial or measurable increase in vehicle travel and considered non-capacity-increasing projects. Projects that are considered non-capacity-increasing would not conflict with CEQA Guidelines 15064.3(b). As noted in Section 5.8(a), all Project elements are considered non-capacity-increasing. Therefore, the project will not increase Vehicle Miles Traveled (VMT) and will not conflict with CEQA Guidelines 15064.3(b). As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

The Project will realign the intersection of W. Cotati Avenue and SR-116 and install a roundabout to improve the safety of the intersection. The new alignment will result in a roundabout- controlled intersection that will have adequate site distances and safety improvements.

Currently, the intersection of SR 116 and West Cotati Avenue has a high rate of collisions, as identified in the 2024 Cotati ATP, and the existing intersection is only stop controlled on the West Cotati Avenue approach. The re-aligned intersection and the improvements to SR 116 are designed to Caltrans Highway Design Manual (HDM) standards, and the installation of the roundabout, pedestrian improvements, and bicycle facilities will improve safety for all road users at this intersection.

The realigned intersection would also facilitate traffic from future developments to the north of the intersection which have been approved by the City of Cotati. The proposed improvements will not result in incompatible vehicles using this intersection. Therefore, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

During construction, the project will maintain through access to business, residents and for emergency vehicles. At operation, the project will maintain through lanes on SR 116 and West Cotati Avenue. Emergency vehicles will continue to be able to use the through lanes, and the roundabout will reduce potential delays from automobiles waiting to make left turns. The addition of a roundabout at SR 116 and West Cotati Avenue will not substantially increase traffic delays as it provides for a continuous flow of yielding traffic to continue at a slower speed. The lanes of the roundabout will be constructed of adequate width for emergency vehicles to safely enter and exit the intersection. Therefore, the Project would not result in inadequate emergency access, and the impact would be less than significant. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy CI 1.1 Ensure that the City's circulation network is maintained and improved over time to support buildout of the General Plan in a manner that is consistent with the City's Circulation Diagram Figure 2.1.

Status: The Project will realign West Cotati Avenue and install a roundabout at an existing stop-controlled street intersection to improve traffic safety. The improvements will support existing traffic volumes and transportation demands generated by continued buildout of the General Plan. As such, the Project is consistent with this policy.

Policy CI 1.2 Ensure that the City's circulation network is a well-connected system of streets, roads, highways, sidewalks, and bicycle/pedestrian paths that effectively accommodates vehicular and non-vehicular traffic in a manner that considers the context of surrounding land uses and the needs of all roadway users.

Policy CI 2.11 Establish and maintain bicycle facilities that are consistent with the network depicted in the City's Bicycle and Pedestrian Master Plan.

Policy CI 2.12 Public road construction projects shall incorporate facilities identified in the Bicycle and Pedestrian Master Plan to the greatest extent feasible.

Status: The installation of the roundabout will accommodate vehicles, bicycles, and pedestrians and will improve access and circulation along SR 116 and West Cotati Avenue by providing a safer well-connected roadway system to accommodate planned buildout of the General Plan. The Project includes new pedestrian and bicycle facilities along SR-116 and W. Cotati Ave. The Project is designed to prioritize efficiency, safety, and comfort for all modes of transportation. As such, the project is consistent with this policy.

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

Status: The Project will install a roundabout and re-align the intersection of W. Cotati Avenue and SR-116. With traffic generated by the three newly approved residential projects, the roundabout is expected to operate at an overall LOS B in the morning peak hour and LOS C in the evening peak hour. The roundabout improves the safety of the intersection for pedestrians, bicycles, and vehicles, and

the Level of Service is above the minimum Level of Service required by this policy. As such, the Project is consistent with this policy.

Policy CI 1.6: When analyzing impacts to the circulation network created by new development or roadway improvements, consider the needs of all users including those with disabilities, ensuring that pedestrians, bicyclists, and transit riders are considered at an equal level to the needs of automobile drivers.

Policy CI 2.1 Establish and maintain a system of pedestrian facilities and crossing enhancements that are consistent with the City's Bicycle and Pedestrian Master Plan.

Policy CI 2.6 Create an accessible circulation network that is consistent with guidelines established by the Americans with Disabilities Act (ADA), allowing mobility-impaired users such as the disabled and elderly to safely and effectively travel within and beyond the City**.**

Action CI 2c: Review all transportation improvements to ensure installation in accordance with current accessibility standards.

Status: The Project prioritizes efficiency, safety, and comfort for all modes of transportation. This includes accessible and ADA compliant sidewalks, crosswalks, and curb ramps. As such, the Project is consistent with this policy.

Policy CI 1.8: Maintain safe travel conditions for all modes of travel.

Policy CI 1.9: Consider all transportation improvements as opportunities to improve safety, access, and mobility for all roadway users.

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

Status: The purpose of the Project is to improve safety for all modes of transportation on SR-116 between Alder Avenue and Redwood Drive. The Project improvements are designed in compliance with the applicable standards of the Caltrans Highway Design Manual and in compliance with City policies and regulations. The improvements include dedicated bicycle lanes and a multi-use pathway. As such the project is consistent with these policies.

Action CI 1b: Ensure that future development provides roadway improvements consistent with the Circulation Diagram and implement the roadway improvements identified in the Traffic Impact Fee Study to improve the safety and efficiency of the current circulation system, and to support buildout of the General Plan.

- Construct a minor realignment of West Cotati Avenue to intersect Gravenstein Highway at an improved angle, and install a traffic signal at the intersection.
- (see General Plan Pages 2-6 to 2-8 for list of improvements)

Action CI 1c: Work collaboratively with Caltrans, the County of Sonoma, and the City of Rohnert Park to identify funding sources and complete the following improvements or improvements of comparable effectiveness, on roadways owned by these agencies within and near the City of Cotati.

- Reconstruct Gravenstein Highway between Madrone Avenue and Redwood Drive to include sidewalks, bicycle lanes, two vehicle travel lanes in each direction, and left turn pockets.
- (see General Plan Pages 2-6 to 2-8 for list of improvements)

Status: The Project will construct two of the projects listed under Action CI 1b and 1c. While the General Plan calls for signalization, as discussed above, the intention of signalization and re-alignment is to improve the safety of a high collision intersection. The roundabout design will reduce the potential for fatal or injury collisions and will provide the intended benefits of signalization. As such, the Project implements the General Plan by realizing identified circulation improvements. Therefore, the Project is consistent with these General Plan Action items.

Conclusion and Environmental Conditions of Approval:

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

5.18. TRIBAL CULTURAL RESOURCES

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

Source: Cotati General Plan 2035; General Plan EIR; Archaeologic al Study for the Gravenstein Highway (SR 116)/West Cotati Avenue Realignment Project by Sally Evans, Evans and DeShazo, September 28, 2023; and AB 52 Notification Memo issued by the City of Cotati to the Federated Indians of Graton Rancheria, July 20, 2023.

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

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

City of Cotati 2013 General Plan EIR Findings

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

Additionally, implementation of the 2013 General Plan could result in the disturbance of human remains. Through the implementation of General Plan Policies CON 4.2 and Action CON 4c and compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98, the implementation of the General Plan would have a less than significant impact.

Project Consistency with the 2013 General Plan EIR

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

A Cultural Resources Evaluation was prepared by Evans and DeShazo (EDS), Inc. on September 28, 2023. In addition to the records search with the NWIC and the BERD, a Sacred Lands File (SLF) inventory request was sent to the California Native American Heritage Commission (NAHC) by electronic mail (email) on July 3, 2023, to inquire about listed Sacred Sites located within or near the Project Area and to obtain a list of local Native American tribes who may have additional information about Sacred Sites, Traditional Cultural Resources, or other properties of traditional religious and cultural importance located within or near to the Project site. EDS also conducted outreach with each tribal organization and individual on the Native American contact list provided by the NAHC to request further consultation regarding traditional, cultural, and religious heritage values associated with the Project.

The NAHC responded on August 6, 2023, with information that the record search of the Sacred Lands File was negative for the presence of any Sacred Sites for the Project Area. Twelve Native American tribal contacts were also provided. On August 7-8, 2023 letters were sent via United

States Postal Service or electronic mail to the 12 individuals on the contact list to request further information about Sacred Sites, Traditional Cultural Resource, or other properties of traditional religious and cultural importance located within or near the Project. Two responses were received. A representative of Lytton Rancheria responded that the Project site falls within the traditional Pomo territory and that there is the potential for finding tribal cultural resources. The Tribe requested additional information regarding the field survey which was provided on August 11, 2023. No additional requests were received from Lytton Rancheria.

On August 21, 2023, a representative of Federal Indians of Graton (FIGR) responded that the Project is located within FIGR's ancestral territory and there may be cultural resource impacts. The NWIC record search was provided to the tribe on August 22, 2023. No additional information was requested and no consultation was requested.

Based on result of the Cultural Resources Study, the Project site is in an area that would have been ideal for hunting and extracting natural resources but was unlikely conducive to occupation by people during the precontact period due to the distance from the nearest waterway. Additionally, the soils within the Project Area do not appear to contain a buried A horizon (paleosols; horizon Ab) and the age of the underlying geology further suggests a limited potential for buried precontact period archaeological resources. As such, the Project area has a low potential for buried precontact period archaeological resources.

While no resources have been identified onsite through field investigation, unknown buried cultural artifacts or features may be encountered during earth disturbing activities. Through implementation of **COA CUL-1** which addresses the discovery of significant archaeological and historic resources including tribal resources, during construction, potential impacts to Tribal Cultural Resources will be reduced to less than significant levels. As conditioned, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Action CON 4c: Require all development, infrastructure, and other ground-disturbing projects to comply with the following conditions in the event of an inadvertent discovery of cultural resources or human remains: (see above Section 5.5 for full text of Action CON4c).

Status: COA CUL-1 requires implementation of the actions described in Action CON 4c to address potential discovery of archeological resources including Tribal Cultural Resources during construction. As conditioned, the Project complies with this policy and this action.

Conclusion and Environmental Conditions of Approval:

The Project is consistent with the General Plan and will not result in any substantial new or more severe impacts to Tribal Cultural Resources relative to what was identified in the General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. Environmental Condition of Approval **CUL-1** is applied to the Project to implement requirements of the 2013 General Plan EIR mitigating policies and actions.

5.19. UTILITIES AND SERVICE SYSTEMS

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

Source: Cotati General Plan 2035; General Plan EIR; Sonoma County Water Agency 2020 Urban Water Management Plan, prepared by Brown and Caldwell, June 2021; City of Cotati Municipal Code; and SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025.

City of Cotati 2013 General Plan EIR Findings

The General Plan EIR evaluated potential impacts to Utilities and Service Systems. Specifically, the impacts of implementation of the 2013 General Plan on water, wastewater, and solid waste systems and determined the following:

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

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

- Impact 3.13-2: General Plan implementation would not result in the construction of a new water treatment facility or expansion of existing facilities, which could cause significant environmental effects because the Projected 2035 water supplies are adequate to meet demand that would be generated by buildout of the 2013 General Plan.

- Impact 3.13-3: General Plan implementation has the potential to exceed wastewater capacity or the requirements of the RWQCB. Upon full buildout of the 2013 General Plan within the City limits, total ADWF is projected to be 0.74 mgd. Within the entire Planning Area, the ADWF would be 0.83 mgd upon full buildout of the General Plan. These ADWF projections exceed the Projections used in the 2011 Sewer Collection System Master Plan. Even with mitigating General Plan Policies CSF 1.1-CSF 1.6 and CSF 2.16 - CSF2.27 and Actions CSF 1a, CSF 1b, CSF 2h-2n, implementation of the General Plan would result in a cumulatively considerable significant and unavoidable impacts.

- Impact 3.13-4: General Plan implementation has the potential to require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Through the implementation of mitigating Policies CSF 2.20, CSF 2.22, and CSF 2.24 implementation of the 2013 General Plan would have a less than significant impact.

- Impact 3.13-5: General Plan implementation would be served by a landfill for solid waste disposal needs and will require compliance with various laws and regulations. Through implementation of the mitigating General Plan Policies CSF 3.1-CSF 3.8 and Actions CSF 3a-CSF 3e, implementation of the 2013 General Plan would have a less than significant impact.

- The City of Cotati adopted the Findings of Fact and Statement of Overriding Considerations on March 24, 2015, including for the significant and unavoidable impacts identified for utilities and service systems (Impact 3.13-3). The City findings determined that despite the significant and unavoidable impact to utilities and service systems, no other project alternative would meet the City's objective to realize the development potential of undeveloped lands for residential, office, and commercial uses necessary for housing opportunity and job growth.

Project Consistency with the 2013 General Plan EIR

5.19(a-c) (Relocation or Expansion of Utilities, Water Supply, Wastewater Capacity) – No Change Relative to the General Plan EIR

In order to construct the roadway improvements there will be adjustments to some existing utility infrastructure which may include a fire hydrant and a light pole. However, there will be no substantial change in the location of utilities. While there may be some short-term increase in water, wastewater, and utility usage during construction, but will not result in new uses nor an increase in intensity that might require the relocation or expansion of utilities. Further, operation of the Project will have no

impact to the water supply, or to the wastewater system as demands generated by the Project will be limited to irrigation for landscaping. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

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

During construction, the Project would generate solid waste from concrete and asphalt from the removal of existing improvements and vegetation waste from tree removal. In compliance with state goals to reduce waste from construction, **COA UTI-1** is imposed and requires that all project contractors recycle or salvage at least 65 percent of nonhazardous construction and demolition waste and prepare a Construction Waste Management Plan that documents the diversion of materials. At operation, waste generation will be limited to the ongoing maintenance of infrastructure improvements, which will generate a negligible change relative to existing conditions. Therefore, the Project will not result in new or more severe impacts relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

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

Status: The Project will not have impacts on the water system as it will not result in new connections or additional usage. As such the Project is consistent with this action.

Conclusion

The Project is consistent with the General Plan Circulation Element and would not result in any substantial new or more severe impacts to utilities and service systems relative to what was identified in the General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The following environmental condition of approval is required to implement the General Plan EIR mitigating policies:

COA UTI-1: All project contractors shall prepare a Construction Waste Management Plan to recycle or salvage at least 65 percent of nonhazardous construction and demolition waste and which documents the diversion of materials.

5.20. WILDFIRE

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

Source: Cotati General Plan 2035; General Plan EIR; Fire Hazard Maps, Office of the State Fire Marshal, April 1, 2024; Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021, prepared by Tetra Tech Consultants for Permit Sonoma, October 2021; and SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025.

City of Cotati 2013 General Plan EIR Findings

The General Plan EIR addressed impacts related to wildfire hazards in Chapter 3.7 – Hazards. The following impact related to wildfires was considered under the 2013 General Plan EIR:

- Impact 3.7-6: The General Plan does not have the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Through the

implementation of mitigating General Plan Policies CSF 2.28-CSG 2.32, CSF 2.36, and SA 1.1 - SA 1.7 and Actions CSF 2o, CSF 2p, CSF SA 1a, and SA 1d, implementation of the 2013 General Plan would have a less than significant impact.

Mitigating policies and actions provided in the General Plan are included in the General Plan EIR to ensure public facilities are able to respond to wildfire emergencies, effective coordination between fire districts, and maintenance of emergency response facilities and infrastructure. Individual projects are directed to be reviewed by the City and the Rancho Adobe Fire Protection District for code compliance. The California Department of Forestry and Fire Protection (CalFire) has designated property within the City of Cotati as being outside of the State Responsibility Area and the areas outside the City limits are designated as moderate fire hazard.

In October 2017, the Tubbs Fire (Central LNU Complex) burned approximately 36,807 acres in Sonoma County. Residents were exposed to direct effects of the wildfire, such as the loss of structures, and to the secondary effects of the wildfire, such as smoke and air pollution. Smoke generated by wildfire consists of visible and invisible emissions that contain particulate matter (soot, tar, water vapor, and minerals) and gases (carbon monoxide, carbon dioxide, nitrogen oxides). Public health impacts associated with wildfire include difficulty in breathing, odor, and reduced visibility.

Sonoma County Multijurisdictional Hazard Mitigation Plan

On September 28, 2021, the Cotati City Council adopted the Sonoma County Multijurisdictional Hazard Mitigation Plan to guide pre- and post-disaster mitigation of identified hazards. The plan includes actions to mitigate current risk from hazards and changes in hazard impacts resulting from climate change, including wildfires. The plan includes Best Management Practices to mitigate the Wildfire Hazard. Thes practices include what are called “personal scale” alternatives such as:

- Clear overgrown underbrush and diseased trees;
- Create and maintain defensible space around structures;
- Regular mowing/landscape maintenance;
- Use of fire-resistant building materials;
- Employ techniques from the Firewise USA Program; and
- Installing or replacing roofing with non-combustible materials.

Sonoma County Community Wildfire Protection Plan

In June 2023, the County Community Wildfire Protection Plan (CWPP) was incorporated by reference into the Sonoma County Annex of the Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). Part of this plan includes the Sonoma County Wildfire Risk Index (WRI). Published on November 17, 2022, the WRI predicts relative wildfire risk. The Wildfire Risk Analysis divides the county's landmass into 100-acre hexagon which are assigned a risk level. While each hexagon is assigned an overall risk level, conditions may vary significantly within the shape. It is entirely possible that areas of relatively low risk could exist within a polygon whose overall risk is high. The purpose of the CWPP and WRI is to inform planning to improve wildfire resiliency.

Project Consistency with the 2013 General Plan EIR

5.20(a-d) (Impair Emergency Plans, Exacerbate Wildfire Risks, Infrastructure Contribution to Risks, Exposure to Wildfire-Related Risks)) – No Change Relative to the General Plan EIR

The Project will implement the General Plan to improve circulation on SR-116 between Alder Avenue and Redwood Drive. The Project spans two evacuation zones, CO-1 and CO-2 on the Sonoma County Evacuation Map. During an emergency SR-116 would serve as a connection to Highway 101 for the purposes of evacuation. Realignment of West Cotati Avenue will improve visibility and create a safer intersection for everyday use as well as during an evacuation. The Project will not result in a conflict with an adopted emergency plan, nor will it exacerbate wildfire risk. As such, the Project will not result in a new significant impact or substantially increase the severity of a previously identified significant impact relative to the 2013 General Plan EIR.

2013 General Plan EIR Mitigating Policies and Actions

Policy SA 1.3: Keep emergency access routes free of traffic impediments.

Status: The Project will reduce potential traffic impediments because it will install a roundabout and realign the intersection of W. Cotati Avenue and provide pedestrian and bicycle improvements which will improve traffic safety that will allow clearer access for emergency vehicles. As such, the Project complies with this policy.

Policy SA 1.5: Ensure that all areas of the City are accessible to emergency response providers.

Action SA 1d: Periodically review, maintain and repair City roadways and emergency access routes and provide signage, where necessary, to clearly identify emergency access routes.

Status: The Project spans two evacuation zones, CO-1[7] and CO-2[8] on the Sonoma County Evacuation Map. During an emergency, SR-116 would serve as a connection to Highway 101 for the purposes of evacuation. The Project will improve safety and traffic flow on an evacuation route. As such, the Project is consistent with this policy.

Conclusion

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

[7] Sonoma County. *Evacuation Zone: CO1 Map.* Published April 7, 2022.
[8] Sonoma County. *Evacuation Zone: CO2 Map.* Published April 7, 2022.

5.21. MANDATORY FINDINGS OF SIGNIFICANCE

	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the Project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Source: Cotati General Plan 2035; General Plan EIR; SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit prepared by Mark Thomas on December 2, 2025; State Route 116 Safety Improvements Project Memorandum prepared by Fehr and Peers on June 4, 2024; Biological Resources Analysis for Highway 116/West Cotati Alignment Plan City of Cotati, CA prepared by Monk and Associates on October 26, 2023; Special-Status Plant Survey Report Year 2 prepared by Monk & Associates on June 5, 2024; Results of an Archaeological Study for the Gravenstein Highway (State Route 116)/West Cotati Ave Realignment Project Cotati, Sonoma County, California prepared by Evans and De Shazo Archaeology and Historic Preservation on September 28, 2023; and Phase I Environmental Site Assessment for West Cotati Avenue Alignment Project, Cotati, CA prepared by Harris and Lee Environmental Sciences, LLC on July 12, 2023.

City of Cotati 2013 General Plan EIR Findings

Under the requirements of CEQA, an EIR is required to discuss cumulative impacts to which the Project would contribute. A cumulative impact is defined as an impact resulting from the combined effects of

past, present, and reasonably foreseeable future projects or activities. The General Plan EIR concluded that implementation of the General Plan, including development considered therein would result in less than significant cumulative impacts to Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gasses and Climate Change, Hazards, Hydrology and Water Quality, Land Use and Population, Agriculture, Public Services, and Recreation.

The 2013 General Plan EIR determined that the implementation of the General Plan would result in the following Cumulative impacts:

- Impact 3.10-7: Cumulative Noise Impacts (Significant and Unavoidable)
- Impact 3.13-3: Potential to exceed wastewater treatment capacity or the requirements of the RWQCB (Cumulatively Considerable and Significant and Unavoidable)
- Impact 4.1: Cumulative Degradation of the Existing Visual Character of the Region (Considerable Contribution and Significant and Unavoidable)
- Impact 4.11: Cumulative Exposure of Noise-Sensitive Land Uses to Noise in Excess of Normally Acceptable Noise Levels or to Substantial Increases in Noise (Considerable Contribution and Significant and Unavoidable)
- Impact 4.13: Cumulative Impact on the Transportation Network (Considerable Contribution and Significant and Unavoidable)
- Impact 4.14: Cumulative Impact on Utilities (Considerable Contribution and Significant and Unavoidable)
- Impact 4.15: Irreversible Effects (Significant and Unavoidable)

Project Consistency with the 2013 General Plan EIR

5.21(a, c) (Threaten to eliminate a biological resource or cultural resource, substantial adverse effects) – No Substantial Change Relative to the General Plan EIR

The Project is consistent with the General Plan in that is implements identified Action items CI 1b and CI 1c to improve transportation and circulation. The Project Conditions of Approval ensure that the Project complies with the policies and actions of the 2013 General Plan. Additionally, and as noted throughout this document, the Project shall comply with the federal, state, and local regulations including uniformly applied standards of the City of Cotati Municipal Code.

The Project is identified in the General Plan and would not result in any substantial new or more severe impacts relative to what was identified in the General Plan EIR. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the 2013 General Plan EIR. The environmental conditions of approval that implement the General Plan EIR mitigating policies are listed in section 7.

5.21(b) (Cumulative Impacts) – No Substantial Change Relative to the General Plan EIR

Cumulative impacts are considered throughout this analysis relative to the buildout of the General Plan and approved and proposed developments adjacent to the subject Project site. As described in the Project description, three housing development projects have been approved including Cotati Village Community, on Parcel 144-050-009 for the construction of 5,000 square feet of commercial space and 177 new housing units. Cotati Village Two on Parcel 144-040-011 for a 2,250 square foot commercial space and 126 residential units, and Redwood Row on Parcels 046-286-019, 046-286-017,

046-286-019, and 046-286-020 for 168 residential units and approximately 10,000 square feet of commercial space.

All of the approved/proposed developments within the Project vicinity are on parcels designated General Commercial in the City's General Plan and the scope and scale of the development was anticipated and accounted for in the General Plan and the 2013 General Plan EIR. Given the potential for simultaneous construction activities on the adjacent properties, **COA MF-1** has been imposed to ensure that the coordination of the projects and minimize the effects of the Project to the maximum extent practicable.

2013 General Plan EIR Mitigating Policies and Actions

Applicable General Plan Policies, Action items, and General Plan EIR mitigation measures are identified in each Section above.

Conclusion

The Project is consistent with the General Plan Circulation Element and would not result in any substantial new or more severe cumulative impacts. Furthermore, there are no circumstances peculiar to the Project site and there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects relative to those identified and evaluated in the General Plan EIR. In addition to compliance with uniformly applied development standards and applicable local and state regulations, the following condition of approval is intended to offset potential impacts from simultaneous construction activities.

COA MF-1: The City shall coordinate the Project's construction activities and construction schedule with the concurrent construction projects immediately adjacent to the Project site and ensure that overlapping lane closures, periods of increased noise and dust generation are minimized to the greatest extent practicable.

6. REFERENCE DOCUMENTS

The following reference documents are hereby incorporated by reference and are available for review at the Community Development Department, 201 West Sierra Avenue, Cotati, California 94931, during normal business hours and online at https://www.cotaticity.org/.

6.1. TECHNICAL APPENDICES

A. *State Route 116 Safety Improvements Project Memorandum* prepared by Fehr and Peers on June 4, 2024.

B. *Memo Addressing Updates to the Biological Resources Analysis for the Highway 116/West Cotati Alignment Plan, prepared by Monk & Associates, September 15, 2026; and Biological Resources Analysis for Highway 116/West Cotati Alignment Plan City of Cotati, CA* prepared by Monk and Associates on October 26, 2023, and *Special-Status Plant Survey Report, Year 2* prepared by Monk and Associated on June 5, 2024.

C. *Results of an Archaeological Study for the Gravenstein Highway (State Route 116)/West Cotati Ave Realignment Project Cotati, Sonoma County, California* prepared by Evans and De Shazo Archaeology and Historic Preservation on September 28, 2023. (CONFIDENTIAL)

D. *Phase I Environmental Site Assessment for West Cotati Avenue Alignment Project, Cotati, CA* prepared by Harris and Lee Environmental Sciences, LLC on July 12, 2023.

E. *Detailed Air Quality Analysis Results* on SR-116 and W. Cotati Ave. Realignment prepared by M-Group on October 30, 2026 using CalEEMod.

6.2. OTHER DOCUMENTS REFERENCED

1. *SR 116/West Cotati Ave. Reconfiguration Project Preliminary Roundabout Geometry Exhibit* prepared by Mark Thomas on December 2, 2025
2. *95% Project Plans for Construction on State Highway in Sonoma County in Cotati from Alter Avenue to Redwood Drive,* Prepared by CalTrans on September 14, 2026.
3. *BAAQMD 2017 Bay Area Clean Air Plan*, prepared by the Bay Area Air Quality Management District, April 2017.
4. *BAAQMD CEQA Guidelines*, April 2022.
5. *BAAQMD Recommended Methods for Screening and Modeling Local Risks and Hazards*, prepared by the BAAQMD, May 2011.
6. *California Code, Government Code Section 66477*.
7. *California Code, Health and Safety Code Section 25501(n)(1)*.
8. *California Department of Conservation Farmland Mapping and Monitoring Program*, 2016.
9. *California Scenic Highway Mapping System*, Scenic Highway System Lists, 2019. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed August 2022.
10. *City of Cotati Municipal Code.*

11. *Climate Action 2020 and Beyond: Sonoma County Regional Climate Action Plan*, prepared by Sonoma County Regional Climate Protection Authority, July 2016.

12. *Cotati Bicycle and Pedestrian Master Plan*, prepared by Sonoma County Transportation Authority for the City of Cotati, adopted December 2008, updated April 22, 2014.

13. *Environmental Review Pursuant to California Public Resource Code CEQA Guidelines Section 15183 for Cotati Village Community Project* prepared by M-Group and adopted by the City Council on February 27, 2024.

14. *EnviroStor*, managed by the Department of Toxic Substances Control, accessed September 2022.

15. *Final Santa Rosa Plain Conservation Strategy*, prepared by USFWS, 2005.

16. *Fire Hazard Maps*, Office of the State Fire Marshal, April 1, 2024.

17. *GeoTracker*, managed by the State Water Resources Control Board, accessed September 2022.

18. *Guidelines for Analysis of Vehicle Miles Traveled*, adopted by City of Cotati September 22, 2020.

19. *Intersection Safety and Operational Assessment Process Memorandum* prepared by Fehr & Peers on April 8, 2026.

20. *Initial Study and Mitigated Negative Declaration for a Zoning Amendment and Residential Care Facility for the Elderly and a Commercial Building* prepared by M-Group and adopted by City of Cotati City Council on November 12, 2019.

21. *Moving Forward 2050: Sonoma County Comprehensive Transportation Plan (CTP)* prepared by Sonoma County Transportation Authority and updated on September 7, 2021.

22. *MTC/ABAG Hazard Viewer Map*, accessed July 27, 2022.

23. *Recovery Plan for the Santa Rosa Plain*, 2016.

24. *Sonoma Clean Power 2021 Annual Report*.

25. *Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021*, prepared by Tetra Tech Consultants for Permit Sonoma, October 2021.

26. *Sonoma County Permit Sonoma GIS, Williamson Act Contracts*, 2017.

27. *Sonoma County Water Agency 2020 Urban Water Management Plan*, prepared by Brown and Caldwell, June 2021.

28. *Technical Advisory on Evaluating Transportation Impact in CEQA*, prepared by the California Office of Planning and Research, December 2018.

29. *USGS Land Cover Classification System.*

7. ENVIRONMENTAL CONDITIONS OF APPROVAL

The following conditions of approval have been identified through this analysis and ensure implementation of applicable mitigation measures and policies set forth in the General Plan EIR.

AQ-1: The City of Cotati shall require all contractors to implement the following dust control and exhaust measures during any construction period ground disturbance:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Each contractor shall post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

AQ-2: All contractors shall implement a Construction Minimization Plan including feasible measures to reduce diesel particulate matter emissions from new construction through enhanced measures as follows:

1. All off-road mobile construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for PM (PM10 and PM2.5). Note that engines meeting the U.S. EPA Tier 2 or 3 standards that include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices would meet this standard.
2. Provide line power to the site during the early phases of construction to minimize the use of diesel-powered stationary equipment.
3. Alternatively, use zero-emission or non-diesel fueled equipment.

BIO-1: In accordance with agency regulations and per the 2020 Programmatic Biological Opinion for the Santa Rosa Plain, vernal pool conservation credits shall be purchased for impacts to suitable Sebastopol meadowfoam habitat at 1.5:1 ratio. Credits shall be purchased prior to the commencement of site preparation, grading, or demolition.

BIO-2: Prior to site preparation, demolition, or grading, California Tiger Salamander mitigation credits shall be purchased from a USFWS approved Conservation Bank at a ratio of 2 square feet of mitigation for every square foot of upland habitat (2:1).

BIO-3: Nesting bird survey shall be conducted within 15 days prior to commencing any phase of construction work if the work would begin between February 1 and August 31. The nesting bird survey shall be conducted on the Project site and within a zone of influence around the Project site.

BIO-4: Prior to demolition, grading, or building, credits from a Regional Water Quality Control Board-approved wetland mitigation bank shall be purchased at a ratio of no less than 1:1 to compensate for the loss of waters of the U.S. and State.

BIO-5: If the final design and engineering plans include tree removal, prior to issuance of any project permits, an arborist's report shall be prepared. If trees are removed, they shall be replaced in compliance with Chapter 17.54 Tree Protection ordinance. Regardless, all contractors shall implement the tree protection measures in compliance with Land Use Code Section 17.54.040 of the Tree Protection Ordinance.

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

a. If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Department shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Department.
b. If human remains are discovered during any ground disturbing activity, work shall stop until the Community Development Department and the County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) and the most likely descendants have been consulted; and work may only resume when appropriate measures have been taken and approved by the Community Development Department.
    - If the skeletal remains are found to be prehistoric, Native American and not modern, then the coroner must call the Native American Heritage Commission in Sacramento that will designate the "Most Likely Descendant" (or MLD) of the discovered remains. The MLD will be responsible for recommending the disposition and treatment of the remains (before construction is resumed). Although the likelihood of encountering human skeletal remains in the project area seems slight, it is important to have a procedure for alternate tasks that can be put into effect quickly in the event that human remains are discovered. This allows for work to continue elsewhere on the project area (where appropriate given the size of the property and location of the discovery) while the remains are properly investigated.
c. If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within

100 feet of the discovery shall cease, the Community Development Department shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Department.

d. If human remains are discovered during any ground disturbing activity, work shall stop until the Community Development Department and the County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) and the most likely descendants have been consulted; and work may only resume when appropriate measures have been taken and approved by the Community Development Department.

GEO-1: Prior to final design and engineering (100% plan set) a geotechnical analysis and report shall be completed by a geotechnical engineer. The report shall include subsurface soil conditions and recommendations for design if poor subsurface conditions exist. The recommendations shall be incorporated into the final design and engineering and implemented in the construction of the Project.

HAZ-1: Prior to construction, the City shall prepare a Lead Compliance Plan and a Soil Management Plan in compliance with current Caltrans guidelines, and a worker Health and Safety Plan. The plans shall address:

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

HAZ-2: Project contractors shall notify any schools within 0.25 miles of the Project at a minimum of 14 days before commencing earthwork. The notice shall include:

- the dates and timeframe for earthmoving activities
- the location of the proposed activities
- the potential for any contamination that may be released due to earthwork the name and phone number of a contact for concerns during project activities.

HYD-1: As part of the final design and engineering, an SWPPP shall be prepared which specifies BMPs that will prevent all construction pollutants from contacting stormwater with the intent of keeping all products of erosion from moving off site into receiving waters. At a minimum, the SWPPP shall identify BMPs for implementation during project construction that are in accordance with the applicable guidance and procedures contained in the California Stormwater Quality Association's California Stormwater Best Management Practices Handbook (2015).

HYD-2: As part of the final design and engineering, an engineer shall prepare and submit SWLID Plan that integrates the most current SWLID Design Manual guidelines.

HYD-3: In preparing final design and engineering plans, the City shall use natural features such as bioswales, vegetation, retention ponds, and other measures to remove pollutants from stormwater and to provide flood control to the maximum extent feasible.

NOI-1: Construction-related noise and vibration impacts shall be attenuated through implementation of the following best management practices (BMPs) for control of construction noise:

- Construction activities shall comply with authorized construction schedules approved by the City and applicable permit agencies.
- Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm on weekdays and 9:00 am and 5:00 pm on Saturdays. No construction shall occur on Sundays or holidays.
- All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
- The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences.
- Unnecessary idling of internal combustion engines shall be prohibited.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the Project site during all project construction.
- Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing at least two weeks prior to construction.
- The construction contractor shall designate a "noise disturbance coordinator" who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures as warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.

UTI-1: All project contractors shall complete the following prior to commencing work:

1. Prepare a Construction Waste Management Plan to recycle or salvage at least 65 percent of nonhazardous construction and demolition waste and which documents the diversion of materials.
2. Coordinate with refuse pickup providers to determine the adequate size and number of containers required to accommodate all waste streams (landfill, recycling, and composting).

MF-1: The City shall coordinate the Project's construction activities and construction schedule with the concurrent construction projects immediately adjacent to the Project site and ensure that overlapping lane closures, periods of increased noise and dust generation are minimized to the greatest extent practicable.